



# Submission to the AEMC on Supporting compliance with meter maintenance obligations

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IntelliHub welcomes the opportunity to provide feedback on the AEMC's consultation paper on Supporting compliance with meter maintenance obligations.

IntelliHub is an Australian and New Zealand based digital energy management specialist that is simplifying the transition to sustainable energy through our holistic ecosystem of smart devices and services. We deliver innovative metering, data and behind the meter solutions that maximise digital and new energy services. We are an experienced and leading provider of multi-utility services across electricity and water networks for residential, commercial & industrial, embedded network and solar metering customers. We specialise in asset management, installation, financing, and the day-to-day operations of smart meters, managing more than 3 million advanced smart meters.

IntelliHub is registered as a Metering Coordinator, Metering Provider and Metering Data Provider in the Australian National Electricity Market and operate under participant names of Action, Acumen, IntelliHub, Powermetric and Spotless.

As one of the proponents of the rule change request our submission will primarily focus on the proposals from Yurika, Plus ES and AEMO (the other proponents) along with our experience as a Metering Coordinator.

### **We agree the NER needs updating to maintain the integrity of the metering framework**

We agree with the other proponents that maintenance of metering installations, which includes inspection and testing of metering installations and the rectification of malfunctions, are important activities in maintaining the integrity of the metering framework because it can impact on financial settlements in the market and customer's bills.

We share the same issues Yurika and Plus ES have described in that getting assistance from some customers and retailers for maintaining metering installations has been challenging and agree with AEMO's observation that these issues apply to both high voltage and low voltage metering installations.

Through our concerted effort over the years in trying to comply with our meter maintenance obligations we have tried, similar to Yurika and Plus ES, various approaches with limited success and can attest to AEMO's view that '... the current framework leaves MCs accountable for compliance without giving them the tools or leverage to compel customer cooperation<sup>1</sup>'.

Therefore, we agree that there are current issues with the framework for maintenance of metering installations and it needs to be resolved in the NER.

### **We in principle support all the proposed changes**

Each proposed change has its merit however we believe all the proposals collectively will provide an appropriate balance of flexibility, incentive and support for the maintenance of metering

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<sup>1</sup> AEMO's Electricity Rule Change Strengthening Metering Compliance and Improving UFE Allocation Fairness Proposal, page 6

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installations to be managed effectively and deliver positive outcomes to the customer and the market.

Therefore we in principle support all the proposed changes and wish to provide commentary to one of AEMO's proposal.

AEMO proposed to update the definition of the term called 'metering installation' to effectively clarify that under clause 7.2.1(a)(2) a metering installation must be compliant and verified (that is, tested and inspected). While we support AEMO's intent of providing this clarification, we suggest that instead of updating the definition of 'metering installation', clause 7.2.1(a)(2) be updated instead to include the suggested clarifications. This will avoid the risk of unintentionally impacting on other clauses that use the term 'meter installation', given its widespread use through the NER.

We would be happy to provide more detail on matters raised in this submission and matters raised in our rule change request. If you have any questions please contact Dino Ou, Industry Development Lead on [dino.ou@intellihub.com.au](mailto:dino.ou@intellihub.com.au) or 02 8303 4033.

Regards,



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