

Consultation paper: Supporting compliance with meter maintenance obligations

STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

To submit this form, [follow this link](#), and select the project reference code RRC0070 or ERC0419.

SUBMITTER DETAILS

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PROJECT DETAILS

NAME OF RULE CHANGE:	Supporting compliance with maintenance obligations
PROJECT CODE:	RRC0070 and ERC0419
PROPONENT:	Yurika, Intellihub, PLUS ES, AEMO
SUBMISSION DUE DATE:	January 15, 2026

CHAPTER 2 – THE RULE CHANGE REQUESTS PROPOSE CHANGES TO THE METER TESTING AND INSPECTION FRAMEWORK

Question 1: Do you agree with the issues that the rule change requests identify with current arrangements for testing and inspection?

<p>a. Do you agree that MCs face challenges in meeting their testing and inspection requirements? For example:</p> <ul style="list-style-type: none"> i. accessing customer sites ii. arranging activities with retailers and large customers to complete testing and inspection activities iii. recovering the costs of testing and inspection activities. <p>b. Do you agree that the current process for MCs to obtain test certificates is inefficient?</p>	<p>Yes, this is an industry wide problem.</p> <p>Yes, particularly when the assets are in the network's substation</p> <p>Yes, this occurs frequently.</p> <p>This often serves as a disincentive to arrange the test.</p> <p>Yes, this is a very manual process which can lead to clerical errors.</p>
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Question 2: Do you agree with Yurika's proposed solution?

<p>a. Should retailers be allowed to disconnect a large customer's premises if the MC communicates that a large customer has failed to ensure that its metering installation is kept in proper working order?</p> <p>b. What are the benefits and risks the Commission should consider in assessing this solution?</p>	<p>Yes, this approach could help address some of the existing issues; however, we anticipate resistance from the LNSP due to supply agreement obligations. We believe this solution would only be viable if the LNSP provides active support and assistance.</p> <p>If the responsibility for initiating disconnection rests with the MC or retailer due to metering non-compliance, there is a significant risk of pushback from the LNSP, given their obligations under existing supply agreements.</p>
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Question 3: Do you agree with PLUS ES' proposed solution?

a. Is it appropriate for the rules to prescribe that contracts between MCs and retailers or large customers include testing and inspection services?	There are numerous variables associated with each test, as these are site-specific and the costs cannot be predetermined for inclusion in a standard contract. While contracts can include clauses requiring customers to maintain compliance—which many currently do—there remain a significant number of legacy contracts that do not address this obligation.
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Question 4: Do you agree with Intellihub's proposed solution?

a. Should retailers be required to inform large customers that MCs are required to test and inspect metering installations?	Yes. We currently seek their assistance (if no response from the customer) in practice; however, retailers generally apply limited pressure as this obligation does not formally rest with them.
b. Should there be a safeguard for cases where a large customer does not fulfil their role in assisting MCs to perform testing obligations?	AEMO has proposed approach of applying UFE appears to align well with this however we also propose alternative approach further detailed in Question 5: c.
c. Should retailers be required to arrange supply interruptions to assist MCs in performing testing obligations?	This requirement would have minimal impact, as high-voltage sites typically schedule downtime during their annual or bi-annual maintenance windows. These sites generally operate with high consumption and require continuous power, making additional interruptions costly and difficult to organise.
d. Should the previous MC be required to provide a copy of test certificates to the new MC?	Yes, we already do that.

Question 5: Do you agree with AEMO's proposed solution?

a. Should the definition of 'metering installation' in the NER be changed to explicitly refer to a compliant and verified installation?	
b. Should retailers be required to assist MCs in meeting their testing and inspection obligations	Yes. The rules should mandate that both retailers and LNSPs provide timely assistance to MCs in fulfilling their testing and inspection obligations.

<p>within a specific time?</p> <p>c. Should the UFE methodology be changed so that retailers with non-compliant metering installations at their connection points would bear a proportionally greater share of UFE?</p> <ul style="list-style-type: none"> Are there any unintended consequences in changing the allocation of UFE? <p>d. Should LNSPs be required to provide advance notice of planned outages to assist MCs in planning testing and inspection activities?</p>	<p>This approach could act as a deterrent for retailers considering high-voltage customers. While CT/VT configurations are generally consistent, implementing such a change may raise legal concerns. Furthermore, the practice of backdating certificates could lead to significant billing complexities and disputes</p> <p>Rather than allocating UFE across non-compliant sites, we support an alternative approach where a financial penalty is applied if a site fails to achieve compliance within a specified timeframe. This would provide a clear incentive without introducing billing complications or legal risks.</p> <p>Yes, this will definitely assist</p>
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CHAPTER 3 – INTELLIHUB PROPOSE CHANGES TO THE EXEMPTION FRAMEWORK FOR MALFUNCTIONS

Question 6: Do you agree that there are scenarios where MCs may not be able to repair malfunctions within the collective timeframes specified in the NER and the exemption periods?

<p>a. Do you agree that there are scenarios where MCs cannot repair malfunctions that are:</p> <ul style="list-style-type: none"> individual failures within 30 business days? family failures within 140 business days? 	<p>To-date Mondo has not had challenge in achieving the current obligations</p>
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Question 7: Do you agree with Intellihub's proposal for the NER to specify what AEMO must consider in the Exemptions procedure?

<p>a. Should the NER define scenarios, guidance, or principles that AEMO must consider when considering an MCs'</p>	
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<p>application for an exemption? If so, what?</p> <p>b. Should MCs be able to apply for an extension to the exemption period in other circumstance where an instrument transformer is not required to be replaced?</p>	
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CHAPTER 4 – MAKING OUR DECISION

Question 8: Assessment framework

<p>a. Do you agree with the proposed assessment criteria?</p> <p>b. Are there additional criteria that the Commission should consider or criteria included here that are not relevant?</p>	<p>We agree with the Commission's proposed assessment criteria for evaluating the rule change request, as they ensure all key aspects are considered.</p> <p>The below constraints which are outside MC's direct control are some additional criteria we recommend for the commission to consider</p> <ul style="list-style-type: none"> • Limited HV Testing Authorities: should be part of the assessment criteria. Only handful HV testing Authorities can do this test. Even with proactive engagement, suitable testing dates are not always achievable within prescribed timeframes. • Access to HV assets: Limited control over access to test these sensitive assets in network-controlled facilities can cause delays. • Contractual & legal dependencies: Widen the scope to include all contracts where other parties are involved. <p>Mondo proposes that once MC has depleted all avenues, LNSPs should intervene and coordinate testing with the customer. As LNSP also has vested interest; they are already suited to coordinate site access, necessary safety protocols and schedule outage accordingly. This approach enhances compliance, improves operational efficiency and leverages on existing cost mechanisms if required.</p>
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