



15 January 2026

Ms Anna Collyer
Chair
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Lodged electronically: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Ms Collyer,

RE: COMPLIANCE WITH METER MAINTENANCE – CONSULTATION PAPER

Origin Energy (Origin) appreciates the opportunity to provide a submission to the Australian Energy Market Commission's (AEMC) Compliance with meter maintenance – consultation paper (RRC0070 /ERC0419).

Meter testing, inspection and maintenance obligations are clearly established in the National Electricity Rules (NER) and sit with Metering Coordinators (MCs). These obligations are fundamental to ensuring accurate settlement, customer billing integrity and the safe operation of the power system.

Origin does not support the proposed rule changes to the extent that they would transfer compliance, enforcement or financial risk to retailers for obligations that are not within retailer control. Retailers do not own or maintain metering installations, do not control physical access to customer sites, and do not conduct testing or inspection activities. Accordingly, shifting risk to retailers would create a material misalignment between responsibility and control.

While we acknowledge that MCs face genuine challenges in meeting their obligations, particularly in relation to site access and customer cooperation, these challenges do not justify reallocating responsibility away from the party explicitly obligated under the Rules.

We are not averse to assisting MCs in meeting their obligations where such assistance is reasonable, proportionate and within retailer control. In practice, Origin already supports compliance outcomes by facilitating communications with customers and assisting with outage coordination where appropriate.

However, we consider that such assistance should supplement the MC's compliance efforts rather than be relied on to achieve compliance outcomes. MCs are ultimately accountable for meeting their obligations under the NER - retailers should not be placed in an enforcement role, nor should they bear liability or settlement consequences for non-compliance driven by customer behaviour or technical matters outside their control.

We consider that the primary cause of non-compliance is limited customer incentive to engage with meter testing and inspection obligations. Specifically, large customers do not bear clear, visible costs of non-compliant metering and are likely to prioritise operational continuity over compliance activities. To address this deficiency, any reforms should focus on customer-facing incentives and obligations, rather than shifting risk to retailers.

Improved compliance with meter maintenance obligations is best achieved by strengthening customer engagement and accountability. This can be supported by introducing clear customer obligations in the Rules that require customers to provide access, cooperate with outage scheduling and maintain customer-owned metering assets. This could be supplemented by applying customer-facing consequences for non-cooperation, enabling cost-reflective recovery of delayed or aborted testing costs. We also support regulator-endorsed education to reinforce that meter maintenance is a regulatory requirement, together with targeted process improvements, such as mandatory storage and provision of test certificates and improved outage visibility from LNSPs, that improve compliance outcomes without transferring risk to retailers.

Our response to selected stakeholder questions is provided at Attachment A.

If you have any questions regarding this submission, please contact Gary Davies in the first instance at gary.davies@originenergy.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sean Greenup', is positioned above the printed name and title.

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

- a. Do you agree that MCs face challenges in meeting their testing and inspection requirements? For example:
- Accessing customer sites.
 - Arranging activities with retailers and large customers to complete testing and inspection activities.
 - Recovering the costs of testing and inspection activities.
- b. Do you agree that the current process for MCs to obtain test certificates is inefficient?

Origin agrees that MCs face genuine barriers that are largely outside their direct control, including:

- Difficulty accessing large customer sites.
- Reliance on retailers and customers to coordinate outages and logistics.
- Limited ability to recover costs where contracts are silent or ambiguous.

We consider that these challenges are structural and not primarily due to MC capability or effort.

The current process for MCs to obtain test certificates is inefficient - the absence of an obligation on outgoing MCs to provide test certificates creates duplication, delay and unnecessary cost, with no clear consumer benefit.

We consider that the AEMC should explore options for the storage and provision of test certificates. For example, test certificates should be stored in a centralised register (e.g. within MSATS or a dedicated metering compliance register), rather than held by individual MCs. There should also be a clear rule obligation that requires outgoing MCs to provide all current and historical test certificates for a metering installation to the incoming MC, with consequences for non-provision. The provision of test certificates should be linked to the MC transfer process so that a transfer cannot be finalised unless a valid certificate is provided or an exemption has been granted.

We suggest that the AEMC also consider introducing a standardised certificate format including information such as:

- Date of test and test type.
- Asset identifiers (meter, CTs, VTs).
- Test method and outcome.
- Next test due date.
- Testing entity details.

Doing so would ensure that certificates are usable and comparable and would reduce disputes about the adequacy or date of testing.

Question 2: Do you agree with Yurika's proposed solution?

- 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?
- b. What are the benefits and risks the Commission should consider in assessing this solution?

Origin does not support the introduction of retailer-led de-energisation for metering non-compliance. Large customer connections are often highly complex. As a result, disconnection and reconnection are not straightforward administrative actions and may require detailed technical planning, coordination with LNSPs and customers, and careful management of safety and operational risks. Origin considers that customer disconnection should remain limited to well-established circumstances, namely where it is required for debt

management in accordance with the Rules, at the explicit request of the customer, or to address safety risks.

Retailers do not control access to large customer sites, own or maintain the metering installations or determine technical compliance of meters. Requiring retailers to de-energise customers for metering non-compliance places enforcement responsibility on the retailer where they have no direct control over the obligation. Retailers should not be positioned as enforcement agents for technical compliance matters that are outside their operational control. Introducing such powers would materially increase customer relationship risk, dispute exposure and reputational harm for retailers.

While the proposal may create a strong incentive for non-cooperative customers to engage, this benefit is outweighed by the complexity in administering and contesting compliance determinations and misalignment between responsibility and control over the maintenance obligation.

Origin considers alternative incentive-based and contractual mechanisms to be preferable.

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?

While we support contractual clarity in principle, mandatory contract inclusions that do not address customer cooperation risks will not resolve the core problem, that of customer refusal to cooperate with the process. Contractual reform alone cannot overcome customer refusal to grant access or approve outages. Any reform needs to place obligations on customers to cooperate with MCs.

We note also that MCs can (re)negotiate contracts with retailers at any time. There is no imperative for contractual conditions to be enshrined in the Rules.

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?
- b. Should there be a safeguard for cases where a large customer does not fulfil their role in assisting MCs to perform testing obligations?
- c. Should retailers be required to arrange supply interruptions to assist MCs in performing testing obligations?
- d. Should the previous MC be required to provide a copy of test certificates to the new MC?

Origin supports information and process improvements but does not support expanded retailer coordination obligations that imply responsibility for outcomes outside retailer control. The proposal risks transforming retailers into default compliance managers without enforcement authority or control.

We are concerned that any customer communications delivered by retailers may be perceived as retailer-driven compliance demands, rather than regulatory obligations.

We strongly support mandatory provision of test certificates by outgoing MCs and improved information flows that reduce unnecessary re-testing. These measures directly address inefficiencies without reallocating risk.

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 within a specific time?
- 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? Are there any unintended consequences in changing the allocation of UFE?
- d. Should LNSPs be required to provide advance notice of planned outages to assist MCs in planning testing and inspection activities?

Origin does not support reforms that impose financial penalties on retailers for non-compliance driven by customer behaviour or technical matters outside retailer control.

It is important that clarifying “compliant metering installation” does not expand retailer liability or imply retailer responsibility for customer-owned assets.

Allocating higher UFE to retailers associated with non-compliant meters penalises retailers without addressing customer obstruction and assumes retailer influence where none may exist. The proposed UFE reform could materially increase settlement volatility for retailers and create unpredictable financial exposure.

Origin supports improved outage visibility from LNSPs and clearer information flows to support coordination, provided these do not imply outcome accountability.

We consider that reforms should focus on direct customer accountability, clearer customer obligations, and regulator-led enforcement, supported by targeted process improvements.

Question 8: Assessment framework

- a. Do you agree with the proposed assessment criteria?
- b. Are there additional criteria that the Commission should consider or criteria included here that are not relevant?

We agree with the proposed assessment criteria.

To the extent that any of the proposed reforms are progressed, we consider it essential that the AEMC also explicitly assess the customer relationship impacts and the operational feasibility for retailers, given the expanded coordination and facilitation role contemplated under several proposals. Consideration should be given to the practical implications for retailers in managing customer communications, coordinating outages, resolving disputes, and responding to non-cooperation, as well as the potential reputational and customer detriment risks that may arise where retailers are perceived as enforcing technical compliance obligations.

In addition, the AEMC should undertake an assessment of the benefits associated with increased meter testing and inspection compliance for customers, including improvements in billing accuracy, safety outcomes and market efficiency, and weigh these benefits against the incremental costs imposed on retailers and customers. This assessment should consider whether the proposed measures represent a proportionate and efficient response to the identified problem, and whether alternative approaches could achieve similar compliance outcomes at lower cost and with less disruption to customer relationships.