AEMC

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?

a. Do you agree that MCs face challenges in meeting their testing and inspection requirements? For example:
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.
	PLUS ES acknowledges that Metering Coordinators (MCs) face significant and ongoing challenges in meeting their testing and inspection obligations. While the MC is incentivised by compliance obligation, the entity employing the MC (Financially Responsible Market Participant (FRMP) or large customer) is not incentivised which is an underlying cause of the challenge. Customer incentivisation to meet regulatory requirements remains a challenge across both large and small customer metering installation sites and extends beyond activities such as testing and inspections. While the challenges outlined below focus on large customers, many of these issues equally apply to small customer sites. PLUS ES recommends that, when addressing this challenge, both customer categories be considered.
	Testing activities typically require supply outages, which can range from 30-60 mins for small customers to 8 hours for large commercial and industrial sites. Despite regulatory requirements and the long-term benefits of testing, customers often introduce barriers that increase costs and resource effort for MCs, leading to inefficiencies and MC compliance risks while the customer and the retailer perceive little or no associated risk. Common challenges include:
	• Access and Scheduling Barriers
	  ○ Limited site availability (e.g., customers only allow access during narrow time windows);
	  ○ Last-minute cancellations or rescheduling by the customer and/or the Local Network Service Provider (LNSP); and
	  ○ Requirement for on-site supervision by customer staff, which delays scheduling;
	• Operational Constraints
	  ○ Critical business operations (e.g., manufacturing lines, data centres) that make outages more difficult to tolerate. For sites with multiple feeders, the downtime can be amplified significantly; and
	  ○ Seasonal or peak demand periods where customers refuse outages due to high operational impact;
	• Financial
	  ○ Direct outage costs (lost production, lost sales, service downtime, LNSP outage fees);
	  ○ Testing costs incurred by the customer:
	  - Engaging a High Voltage (HV) testing service provider;
	  - LNSP coordination costs to enact an outage;
	  - Hiring HV-accredited operators to conduct switching operations (where customers lack suitably trained staff); and

- Procuring or hiring mobile plant, particularly for pole top metering installations;
  - Internal budget cycles and approval timing constraints;
  - Perceived lack of value (benefits of testing unclear vs cost);
  - Cost-sharing disputes among tenants/landlords or multi-party sites;
  - Cash flow constraints; and
  - Competing CAPEX/OPEX priorities.
- Administrative and compliance barriers
  - Complex internal approval processes within customer organisations;
  - Additional safety or induction requirements imposed by the customer before granting access;
  - Insurance or liability concerns raised by customers; and
  - Accountabilities and responsibilities to support MC obligations via the regulatory framework – no repercussions for customers who refuse to comply.
- Physical and technical barriers
  - Locked or restricted areas where metering equipment is located
  - Customer installed equipment obstructing access to metering installations; and
  - Site layouts requiring special arrangements for testing e.g provision of and elevated work platform.
- Communication barriers
  - Failure to update contact details or provide correct site information; and
  - Language or communication gaps with site representatives.

Impacts of the barriers include:

- Delays in testing schedules, potentially extended deferrals;
- Increased administrative overhead due to repeated contact and scheduling attempts, longer lead times;
- Exposure to regulatory risk due to missed compliance deadlines; and
- Financial risk arising from inaccurate metering installations not being identified, leading to billing errors and wholesale market settlement discrepancies. For large customers, these inaccuracies can result in substantial financial impacts. Safety risks associated with unidentified malfunctioning metering installations, including potential fire hazards or risk to field personnel from exposure to aggressive customer behaviour.

Retailer Assistance

Assistance from retailers is highly variable, and the timeliness of support is inconsistent—particularly where planned interruptions are required. The level of retailer engagement to encourage customers to accept metering tests is often influenced by the perceived risk of customer churn. This limits proactive action to achieve the MC desired outcomes.

Recovering the costs

	MCs face significant challenges in recovering the costs associated with testing and inspection activities, particularly due to commercial and contractual limitations, as well as the key challenges identified above. • Commercial arrangements with retailers MCs operate under commercial agreements with retailers that typically restrict cost recovery options. While these agreements include installing and reading meters – which aligns with retailer incentives – there is no requirement to include metering maintenance which is an MC obligation. Retailers may suggest cost recovery directly from the customer, but there is no mechanism to enforce this, as commercial agreement is with the retailer. This often leaves MCs exposed to unrecoverable costs or non-compliance when customers resist or delay compliance; • Large customer contract limitations There is currently no enforceable requirement for customer contracts to include testing and inspection obligations. This gap means MCs cannot compel customers to cooperate or contribute to cost recovery, even when testing is a regulatory requirement; • Cost absorption for small customers For small customers, testing costs are generally absorbed within the annuity structure. While this model works for low-cost activities, applying the same approach to large customers would significantly increase annuity charges and could price MCs out of contention in a competitive market; and • Large customer testing complexity Testing for large commercial and industrial customers involves extended outages, complex coordination, and higher direct costs such as expensive test equipment and highly skilled technical resources. Without a clear cost recovery framework, MCs bear these costs, creating financial risk and disincentivising compliance activities.

b. Do you agree that the current process for MCs to obtain test certificates is inefficient?	Typically the relationship between a MC and the Metering Provider (MP) is vertically integrated and as such when an MC churns a site the meter is exchanged by the incoming MC.
	Test certificates are usually required for components of the metering installation, such as current and voltage transformers, which are often provided by the customer. Customers may include the LNSP at substations, builders/developers for greenfield sites, or landlords of the site.
	Factors impacting the provision of test certificates:
	• Unavailability of a test certificate
	  ○ The outgoing MC may not have been provided with a test certificate when they initially churned to the site and may not have performed a test to create their own certificate; and
	  ○ The current customer (account holder) at the site may not possess a test certificate; and
	• Processes and timeframes

	○ There are no standard processes across contestable MCs (e.g., different contact points or inboxes); and ○ There are no agreed timeframes for responding to requests for test certificates, either by providing the certificate or confirming that none are available. PLUS ES acknowledges that, in the absence of standard processes and agreed timeframes across contestable MCs, current practices may be inefficient. However, we do not support imposing an obligation on the outgoing MC to provide unsolicited test certificates to the incoming MC. **Proposed equitable process:** • If required, the incoming MC should send a request to the outgoing MC for the relevant test certificate(s); and • The outgoing MC should have no more than 10 business days to either provide the certificate(s) or advise that none are available. Requiring the outgoing MC to proactively monitor churn events and send unsolicited certificates or notifications that test certificates are not available would impose unnecessary operational costs for sites that have moved to a competitor. This is often redundant, as the incoming MC may already have obtained the test certificates from the customer during onboarding.

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?	PLUS ES supports granting retailers the authority to disconnect a large customer's premises where the MC has confirmed that the customer has failed to coordinate or allow testing of the metering installation. This authority should only be exercised as a mechanism of last resort, after all reasonable attempts to achieve compliance have been exhausted and with multiple safeguards embedded in the rules to protect customers and ensure fairness. However a retailer will not be adequately incentivised to pursue the disconnection of a large customer unless by doing so, the retailer avoids exposure to their own compliance risk. To provide certainty and accountability, an industry agreed process must be established. This process should clearly define the roles and responsibilities of each participant, outline the required activities, and ensure that all parties are held accountable for their obligations. Such a framework will deliver consistency, transparency, and confidence in the application of this measure. PLUS ES further recommends that similar incentivisation measures be considered for all customer segments and for all non – compliance issues where the customer's action (inaction) is preventing the MC from achieving full compliance of the installation or result in increased operational costs. Example of scenarios other than testing include, but are not limited to, remediation of malfunctioning metering installations, upgrading metering to support telecommunications when environmental or technological factors impact the availability or strength of the signal etc.

	Access to metering infrastructure remains a significant operational challenge, resulting in inefficiencies and increased costs. These include direct impacts such as wasted truck visits and repeated customer contact attempts, as well as downstream consequences like delays in meeting regulatory and procedural obligations. Addressing these access issues through appropriate incentives would improve compliance, reduce resource strain, and enhance overall market efficiency.
b. What are the benefits and risks the Commission should consider in assessing this solution?	The Commission should consider the following in assessing this solution: • Retailer accountability PLUS ES supports the retailer has the accountability of any disconnection as they have the customer interface and retail contract with the customer. Any costs incurred by an 'imposed' disconnection should be invoiced and payable to the retailer. The Commission must weigh the retailer's willingness to disconnect a customer against the risk of retailer churn, particularly where obligations stem from the Metering Coordinator (MC). Disconnection should remain an act of last resort; however, for this measure to be effective, retailers must not only have the authority but also a clear obligation to act when customers fail to meet compliance requirements. Without this enforcement mechanism, the integrity of the regulatory framework is undermined; • Industry agreed process and transparency Customers frequently churn between MCs and retailers to avoid compliance actions. This behaviour creates inefficiencies and delays that erode the effectiveness of regulatory measures. An industry agreed, transparent process is essential to close this loophole. A standardised end to end (E2E) roadmap ensures consistency and accountability, while transparency allows any incoming MC or retailer to seamlessly continue the process from where the previous party left off. This prevents customers from 'resetting the clock' through churn and ensures that every delay moves them closer to disconnection rather than restarting the process; and • Safeguard process prior to disconnection The rules must embed clear communication requirements and detailed guidelines to ensure customers are fully informed of the disconnection process. This should mirror the notification standards currently applied for non-payment disconnections, while extending to include: o Cost transparency: Customers must be advised of all applicable disconnection and reconnection fees upfront; and o Defined timeframes: A clear window must be provided for customers to agree to and undertake the required testing to avoid disconnection. These timeframes should reflect the preceding steps and notifications already issued, ensuring fairness and proportionality. Such safeguards uphold consumer protections, provide transparency, and reinforce the seriousness of compliance obligations, while ensuring

	customers have every reasonable opportunity to meet requirements before disconnection occurs. The ability to disconnect a customer for non-compliance—when supported by robust safeguards—is not only appropriate but essential for maintaining the integrity of the market. This measure delivers multiple benefits: • Fairness and equity: It ensures that compliant participants are not disadvantaged by those who fail to meet their obligations; • Prevention of market gaming: Disconnection acts as a deterrent against customers exploiting loopholes or delaying compliance through churn or avoidance tactics; • Accuracy in market settlements: Reliable metering data is critical for accurate settlements. Non-compliance compromises this accuracy, creating systemic risk; • Strengthened system reliability: Improved data integrity supports operational planning and system security, reinforcing confidence in the regulatory framework; and • Reduced operational expenditure (OPEX): Compared to the current state, where repeated follow-ups and extended delays increase costs for retailers and MCs, a clear disconnection pathway minimises unnecessary administrative and operational overhead. This efficiency benefit ultimately reduces costs across the market.

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?	This proposal has been raised because testing for large customers is often costly and has historically been deprioritised by retailers and large customers to reduce annuity and operational (OPEX) costs. The intent is to address this issue by explicitly requiring testing and inspection services to be included in contracts, making them a mandatory and enforceable obligation. Without such a requirement, parties have a strong incentive to exclude these obligations, which undermines compliance, data integrity, and overall system reliability. The benefits of including the testing and inspection services are: • Ensures compliance and accurate market settlements; • Creates a level playing field for all contestable parties and customers; alternatively, retailers can use market power to exclude the test obligations from contracts to reduce their costs; • Provides certainty and accountability for roles and cost recovery; and • Encourages collaboration: if in the rules, retailers and customers will support MCs in meeting obligations. Prescribing these requirements in the rules ensures testing and inspection remain a non-negotiable component of metering obligations, delivering transparency, accountability, collaboration, and a level playing field for all market participants.

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?	PLUS ES supports requiring retailers to inform large customers that MCs are obligated to test and inspect metering installations. Large customers, in particular, must understand that these activities are regulatory requirements, not optional services. Clear and proactive communication prevents misunderstandings and ensures customers are prepared to cooperate. Retailers should provide this information upfront during the onboarding process and explicitly include it in retail contracts. Doing so reinforces the importance of compliance and helps reduce resistance when testing needs to be scheduled. Consistent messaging and transparency from retailers will minimise disputes, avoid delays, and ensure testing obligations are applied uniformly across the market.
b. Should there be a safeguard for cases where a large customer does not fulfil their role in assisting MCs to perform testing obligations?	Large customers not allowing testing of their metering installations compromises data integrity and may lead to inaccurate market settlements, creating systemic risks for reliability and operational planning. Non-cooperation also increases operational costs due to repeated follow-ups. Persistent non-compliance undermines fairness, erodes market confidence, and exposes all parties – except for the customer who is not allowing the testing – to regulatory breaches. PLUS ES supports safeguards to ensure compliance and protect market integrity. These could include as a minimum: • Clear communication and notification requirements including consequences of non-compliance; • Defined timeframes: Rules should specify reasonable timeframes for customers to agree and undertake testing, considering prior notifications and steps already taken; • Industry - agreed process: A transparent, standardised process should allow any incoming retailer or MC to continue compliance actions without resetting the clock, preventing customers from gaming the system through churn; and • Last-resort disconnection mechanism The benefits of safeguards will: • Protect compliant participants and ensures fairness; • Reduce operational inefficiencies and OPEX compared to repeated follow-ups; and • Strengthen market confidence by ensuring obligations are enforceable.
c. Should retailers be required to arrange supply interruptions to assist MCs in performing testing obligations?	**HV sites** HV customer sites often require a disconnection from the network which is undertaken by the LNSP – a network planned outage. PLUS ES does not support that a retailer should be required to arrange supply interruption: • The main stakeholders involved in a supply interruption are the LNSP, the customer, and the MC;

	• The LNSP is responsible for planning and executing network interruptions, and the MC coordinates testing activities that require these outages; and • The LNSP maintains a direct contractual relationship with the customer through the Connection Service Agreement. This agreement governs the terms under which the customer is connected to the network and outlines obligations relating to safety, access, and cooperation for network related activities. Retailers should only be required to support the process, as required, when a network planned interruption is requested, for example providing updated customer contact details, etc. However, they should not be responsible for arranging or initiating the interruption, as this falls outside their operational role and could create unnecessary complexity and risk. That said, PLUS ES supports allowing retailers to enforce a supply interruption for customers who refuse to engage or agree to testing, but only as a last resort, when advised by the MC. The rules should clearly define roles to avoid duplication or ambiguity, ensuring accountability and efficiency. **Sites Other Than HV** PLUS ES does not support requiring retailers to initiate supply interruptions to assist MCs in performing testing obligations. We recognise that retailers may have varying bilateral processes in place with their MCs, and the wording proposed by Intellihub implies that the retailer is responsible for arranging and scheduling the interruption, which may not reflect actual practice. Similarly, we do not support requiring retailers to inform the MC of the date or date range originally provided by the MC to the retailer, as this adds unnecessary duplication. However, PLUS ES supports introducing an obligation for retailers to undertake bilaterally agreed actions within a defined timeframe when informed by the MC that a site visit requires a planned interruption and a scheduled date or date range has been provided. For example, some retailers require a B2B Service Order to be provided to the MC or retailer to send planned interruption notices to their customers for outage activities. This approach ensures accountability without imposing operational responsibilities that fall outside the retailer's role.
d. Should the previous MC be required to provide a copy of test certificates to the new MC?	As outlined in response to Q1b, PLUS ES supports that the outgoing MC should only be required to provide test certificates upon request from the incoming MC and only where such certificates are available. For efficiency and clarity, we also support the inclusion of defined timeframes for responding to test certificate requests to ensure timely handover and reduce delays in compliance/operational processes.

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?	While PLUS ES acknowledges Australian Energy Market Operator's (AEMO's) intended outcome, we do not support the proposed amendment to the definition for the following reasons: • Introduces ambiguity and complexity: The proposed wording creates uncertainty and remains open to interpretation. A meter may be non-compliant with testing schedules, but this does not necessarily mean that its operational integrity has been compromised. For example, if a meter has not been tested, it is no longer considered a metering installation and none of the metering installation obligations apply? Such ambiguity risks inconsistent application of the rules; and • Fails to address core compliance issues: The amendment is a theoretical solution that does not resolve the practical challenges associated with testing as identified by MCs within their respective rule change proposals. It does not incentivise retailers or customers to comply. Retailers typically delegate metering obligations to MCs, yet MCs lack the tools and authority to enforce compliance, creating a cycle of inaction. A more effective approach should focus on enforceable obligations, clear accountability, and mechanisms that drive retailer and customer cooperation.
b. Should retailers be required to assist MCs in meeting their testing and inspection obligations within a specific time?	PLUS ES does not support that introducing mandatory timeframes for retailer assistance will achieve the desired outcome without it being a component of an industry agreed E2E process. While we acknowledge the intent to improve compliance, this approach fails to address the core issue and does not resolve the practical challenges associated with testing or the barriers presented by customers. Timeframes may encourage retailers to undertake minimal, perfunctory actions to demonstrate 'assistance', but they do not create meaningful engagement or incentivise customer cooperation. The fundamental barrier remains that customers often resist testing due to cost, operational impacts, and the inconvenience of outages. Retailers are unlikely to escalate these requirements for fear of customer churn. Furthermore, imposing rigid timeframes adds unnecessary complexity to the bilaterally agreed processes between retailers and MCs and may restrict the flexibility MCs currently have in scheduling testing services. Without mechanisms that directly incentivise customer compliance and provide MCs with enforceable tools, introducing timeframes for retailers will not achieve the intended outcome.
c. Should the UFE methodology be changed so that retailers with non-compliant metering installations at their connection points would bear a	PLUS ES has the following points for the Commission's consideration: • Identifying non-compliant metering installations ○ PLUS ES supports the concept of identifying non-compliant metering installations and recommends that the most efficient approach is to make this information transparent within Market Settlement and Transfer Solutions (MSATS). Under this model, the MC or MP would update the relevant data once, ensuring visibility

proportionally greater share of UFE? • Are there any unintended consequences in changing the allocation of UFE?	and transparency for all market participants. However, non-compliant metering will need to be better defined to remove previously mentioned ambiguity and challenges and include all instances of non-compliance not just those related to testing obligations. For example, a malfunctioning meter which has not been remediated should also be considered as non-compliant; ○ This approach would support downstream processes such as retailer churn and customer churn without duplication or manual intervention; ○ To enable this solution, the rules must explicitly allow for the identification of non-compliant metering installations to be delivered via MSATS, ensuring consistency, efficiency, and market-wide access to accurate compliance information; and ○ Retailers may choose not to onboard customers with non-compliant metering installations. While this could serve as an incentive for customers to comply, it may also have the unintended consequence of reducing competition for these customers. • Changing the allocation of Unaccounted for Energy (UFE): Adjusting the UFE may help address the issue, but it is administratively burdensome and does not resolve the underlying cause. ○ A metering installation deemed non-compliant for failing to meet testing or verification schedules does not necessarily mean that the meter's operational integrity has been compromised. The equipment may still function accurately and reliably despite administrative non-compliance; ○ Retailers with larger customer portfolios may spread the impact of UFE allocation across multiple products, potentially negating the intended outcome of the change; and ○ Conversely, smaller retailers may bear a disproportionate burden under the revised allocation approach, creating inequities and unintended consequences in the market.
d. Should LNSPs be required to provide advance notice of planned outages to assist MCs in planning testing and inspection activities?	PLUS ES supports the proposal in principle; however, the administrative burden and associated costs of developing appropriate system processes would outweigh the potential benefits. The notification would merely be a prompt to the MC that an outage was planned. To make the outage useful to the MC they would need to engage with the LNSP to coordinate the details. This is likely to involve changes to the originally planned outage (scope, duration etc.) and therefore become an iterative process. We provide the following considerations for the Commission's review: • Current practice: LNSPs currently publish planned outage information on their websites. While useful, this method does not provide real-time integration or automation for downstream processes. To improve efficiency, transparency, and coordination, the provisioning of planned outage information must be via a push notification mechanism that can be ingested by recipients' systems, including any amendments to planned outage dates;

	• Alignment of outage windows: LNSP planned interruption timeframes are designed primarily to accommodate network activities. Further engagement is required to determine whether these windows can also accommodate metering related activities without creating operational conflicts; • Extension of outage timeframes: Planned interruption windows may need to be extended to allow both network and metering activities to be completed efficiently and safely. Any changes to planned outage durations or frequency must consider the impact on network performance metrics and compliance with Guaranteed Service Level obligations; and • Safety safeguards: Robust safeguards must be implemented to mitigate the risk of supply being reconnected while metering field workers remain on site. This includes clear communication protocols and confirmation processes between LNSPs, MCs, and retailers.

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?

a. Do you agree that there are scenarios where MCs cannot repair malfunctions that are:
• individual failures within 30 business days?
• family failures within 140 business days?
	Based on field experience, PLUS ES supports there are scenarios where MCs cannot repair malfunctions within the regulated timeframes. These scenarios generally fall under third-party dependencies, where the MC requires action from another party, typically the customer or the manufacturer of metering installation components. Examples include:
	• Availability of components: Delays in sourcing metering installation components such as current and voltage transformers;
	• Customer inaction: When advised there is a need to replace failed CT's and VT's, customers fail to take any action. This is especially the case when the failure is an accuracy test failure rather than a catastrophic failure. This may be due to the cost for a replacement. It may also be an issue where the electricity account holder is not the owner of the failed equipment. For example, a tenant or a legacy arrangement where the transformers are located in an LNSP substation;
	• Access to the metering installation
	  ○ Premises access: Meters may be located behind locked gates, doors, or inside the account holder's residence. The account holder may not have the keys, may be on extended leave, or may fail to respond to contact attempts within regulatory timeframes;
	  ○ Infrastructure barriers: Physical obstructions that have arisen since installation, requiring customer action to remove, such as:
	  - Structures (carports, sheds) blocking access to the switchboard;
	  - Vegetation (trees, bushes) obstructing safe access; and

	- Animals or nests near the metering installation creating safety hazards; and ○ Defects: Electrical defects that prevent safe meter exchange, requiring remediation by the customer or their representative; and • Customer behaviour: Aggressive or threatening behaviour by customers can pose safety risks to installers, requiring retailer intervention and monitoring for customer churn before proceeding. All these scenarios involve factors beyond the MC's control. PLUS ES recommends that the rules allow MCs to request long-term extensions in such cases to reduce administrative burden for both AEMO and MCs. Extensions should include safeguards and monitoring requirements to ensure malfunctions are not left unresolved indefinitely, with semi-regular follow-ups based on the cause.
Question 7: Do you agree with Intellihub's proposal for the NER to specify what AEMO must consider in the Exemptions procedure?	
a. Should the NER define scenarios, guidance, or principles that AEMO must consider when considering an MCs' application for an exemption? If so, what? 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?	Despite industry feedback provided during the consultation process, AEMO's recent updates to the exemption procedures leave MCs potentially vulnerable to malfunction compliance breaches[1] outside their control. These determinations appear to overlook the practical, in-field challenges faced by MCs. To address this, PLUS ES advocates for the inclusion of clear scenarios and guiding principles within the NER. This would mirror the 'exception scenarios' currently applied to metering installation timeframes, where the Commission accounts for delays beyond the MC's or retailer's control. Establishing these rules will ensure transparency, consistency, and ensure MCs are not penalised for practical challenges beyond their remit. As outlined in the earlier question we recommend the following exemption scenarios and propose the below guiding principles: Scenario for exemptions: • Third-party dependencies: Issues such as site access restrictions (locked gates, safety hazards), customer-side electrical defects, or aggressive behaviour; • Supply chain constraints: Delays in sourcing specialised components like current or voltage transformers despite reasonable efforts; and • Safety risks: Circumstances where strictly adhering to regulated timeframes would compromise field worker safety. Proposed Guiding Principles: • Evidence-based: MCs must document all remediation attempts and stakeholder engagement; • Proportionality: Extensions should be commensurate with the complexity of the barrier to prevent indefinite delays; and

[1] Malfunctioning metering installations cannot always be remediated within the regulated timeframes, and AEMO's current framework does not enable MCs to raise exemptions or seek extensions when the prescribed timeframes are incommensurate with the nature and complexity of the barrier.

	• Continuous Monitoring: MCs should maintain active oversight (e.g., monitoring customer churn) to ensure malfunctions are tracked until resolution. PLUS ES supports a mechanism allowing MCs to apply for exemptions and subsequent extensions in these circumstances, and the exemptions to be automatic and evergreen, provided they meet the above criteria. Alternatively, to further reduce the administrative burden for both AEMO and the MC, where third-party action (or inaction) triggers an exemption requirement, the exemption process should operate as a notification to AEMO rather than a formal request, applying the guiding principles outlined above. MCs could provide periodic updates to maintain the exemption indefinitely or until the malfunctioning meter is replaced. If updates are provided, the exemption could remain valid on an ongoing basis. Compliance with this process would be assessed through the existing MC audit framework. If an auditor identifies an issue, AEMO would retain the ability to take corrective action.

CHAPTER 4 – MAKING OUR DECISION

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?	Currently, all MCs rely solely on persuasion to achieve compliance, as customers are under no formal obligation to comply with regulated testing requirements. PLUS ES propose the following additional criteria for the Commission's consideration: • Will the rule change requests' proposed solutions incentivise retailers into supporting MCs to meet their testing and inspection obligations? and • Will the root causes of the testing and inspection compliance shortcomings be improved?