



6 February 2026

Anna Collyer
Chair
Australian Energy Market Commission

Submitted online: www.aemc.gov.au

Dear Ms Collyer

Compliance Template Review 2026 – Issues Paper

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the Australian Energy Market Commission's (AEMC) Consultation Paper on the *Compliance Template Review*.

Changes to performance standards and technology over the last five years have been considerably more significant than those addressed in previous reviews of the template. This presents a clear opportunity to overhaul the Template to provide greater clarity, more detailed guidance, and enhance support for operators of NEM assets (including battery systems and synchronous condensers) in developing more efficient and fit for purpose compliance programs. We encourage the AEMC to establish a working group comprising industry experts to update the testing and monitoring regimes described in the template and evaluate the material inefficiency of the program.

Origin is broadly supportive of the proposed amendments to the compliance principles and the suggested structure, including the approach to describing monitoring programs by the plant type, which would improve clarity and usability. However, noting our recommendation to undertake an end-to-end overall of the Template, the proposed six-month transition period for asset operators to align with revised guidance may not be reasonable as budgets are set annually. The breadth of potential changes, combined with well-known resource constraints in the external compliance testing market, suggest that a longer and more flexible implementation timeframe may be necessary to ensure operators can adjust their practices to comply effectively without undue operational or financial burden.

If you wish to discuss any aspect of this submission further, please contact Liz Robertson at elizabeth.robertson@originenergy.com.au.

Yours Sincerely,

S Cole

Shaun Cole
Group Manager, Regulatory Policy