



PO Box 4136
East Richmond VIC 3121
T 131 806
F 1300 661 086
W redenergy.com.au

PO Box 4136
East Richmond VIC 3121
T 1300 115 866
F 1300 136 891
W lumoenergy.com.au



7 May 2026

Ms Lisa Shrimpton
Director
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted electronically

Dear Ms Shrimpton,

RE: Supporting compliance with meter maintenance obligations - Consultation Paper (RRC0070/ERC0419)

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to make this submission to the Australian Energy Market Commission's (the Commission's) consultation paper on rule change proposals to improve compliance with meter maintenance obligations.

Red and Lumo support the Commission's Draft Rule, which places obligations to facilitate meter maintenance upon the person who appoints the Metering Coordinator. However, we note that 'promptly' providing 'reasonable assistance and cooperation' is problematically ambiguous when a civil penalty applies for non-compliance.

Red and Lumo acknowledge that a retailer, when requested by a Metering Coordinator (MC), should be expected to clearly communicate key information. This includes the need for testing, maintenance or repair of the metering installation, a proposed date and time for any interruption to supply, and any expectations upon the customer, including a requirement for access. The customer should then have an opportunity to respond and negotiate the date and time of access. However, the nature of the penalty for non-compliance is such that the rule should be more explicit about what compliance looks like. As currently drafted, the rule is ambiguous and leaves considerable room for interpretation.

We also note that where there is a defect preventing installation of a smart meter at a metering installation, the National Energy Retail Rules (NERR) prescribe that a retailer must communicate with a small customer within five business days of being notified by the MC. The Commission's draft rule introduces a potentially conflicting expectation on the content of the retailer notice and requires the MC to remind the retailer after 40 business days, when the retailer is in the process of meeting its obligations under the NERR. Red and Lumo recommend that the Commission align its proposed obligations to remove these issues.

To initiate communication between a retailer and their customer, an MC will need to provide notice to the retailer of the reason for the work, the date on which it MC proposes to do the

work and any interruption of supply that it requires. Similarly, an MC may need to communicate the need for inspection, testing or repair of a metering installation where a defect has previously been identified. We note, however, that existing B2B transactions do not fully support communicating these details. Consequently, we recommend that the Commission consider an effective date of 1 December 2027, at the earliest, to allow industry sufficient time to develop and then implement the necessary B2B Procedures.

About Red and Lumo

We are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail electricity and gas in New South Wales, Queensland, South Australia, Victoria and the Australian Capital Territory to over 1.6 million customers.

Red and Lumo thank the Commission for the opportunity to comment on the consultation paper. Should you wish to discuss or have any further enquiries regarding this submission, please call Sean Jennings, Regulatory Manager, on 0403 846 585.

Yours sincerely

A handwritten signature in black ink, appearing to read "G Hargreaves".

Geoff Hargreaves
Manager - Regulatory Affairs
Red Energy Pty Ltd
Lumo Energy (Australia) Pty Ltd