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7 May 2026

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

Dear Anna Collyer

**Re: AER submission to AEMC Supporting compliance with meter maintenance obligations draft rule determination**

The AER welcomes the opportunity to provide a submission on the Australian Energy Market Commission's (**AEMC**) draft rule determination on *Supporting compliance with meter maintenance obligations*, published on 26 March 2026.

The AER is supportive of the draft rule as a balanced and practical response to the challenges Metering Coordinators face in meeting their meter testing, inspection and malfunction repair obligations under the National Electricity Rules (**NER**). We consider the proposed rule change may positively contribute towards the achievement of the National Electricity Objective, particularly in relation to the long-term interests of consumers through improved metering accuracy, more efficient meter maintenance arrangements, and reduced unaccounted for energy.

This submission outlines the AER's views on the draft rule.

***Obligations of retailers and other persons who appoint Metering Coordinators***

The AER supports the introduction of obligations on appointing parties to provide reasonable assistance and cooperation to Metering Coordinators as a practical measure to support the timely testing of metering installations. We note that the proposed clause is agnostic as to the type of metering installation and interacts with other relevant obligations in Chapter 7. This includes 'applicable timing requirements' and provides appropriate flexibility to Metering Coordinators for the different types of metering installations.

The central obligation in proposed clause 7.6.2A(a) requires the appointing party to provide 'reasonable assistance and cooperation' to Metering Coordinators. Importantly, with respect to high voltage (**HV**) metering installations, the term 'appointing party' includes both retailers

and large customers who have direct metering agreements with Metering Coordinators. Clause 7.6.2A(b) provides further specific obligations that are captured within 'reasonable assistance and cooperation'.

Proposed clause 7.6.2A(b)(1) requires appointing parties to 'facilitate a supply interruption at the connection point, including by agreeing the date on which the supply interruption will take place'. Metering Coordinators must request a retailer or a Distribution Network Service Provider (**DNSP**) perform a planned interruption on their behalf. This also involves coordination with the customer, whose operations must necessarily be suspended during the supply interruption. We support the introduction of a positive obligation to encourage parties to reach agreement.

However, we consider that there is a risk that the current drafting may create difficulties for appointing parties to comply in circumstances where it requires the consent of a third party. Consent may be difficult to obtain due to the different impacts a planned interruption can have on different stakeholders. We recommend framing the positive obligation on appointing parties to take all reasonable steps to coordinate a planned interruption with relevant stakeholders. This would allow for the appointing party to comply with their obligation if they have taken all reasonable steps to secure the third party's agreement and support Metering Coordinators.

We also note that the term 'supply interruption' is an undefined term in the NER. In the context of testing metering installations, it has the same meaning as 'planned interruption'. We suggest that the AEMC replace the term with 'planned interruption' in proposed clause 7.6.2A(b)(1) to ensure consistency across obligations.

Finally, we consider it is appropriate that the proposed rules apply to all appointing parties regardless of whether they are a Registered Participant or not. Even in the absence of being registered, the appointing parties are in a position to appropriately facilitate the planned interruption necessary to conduct the testing of metering installations.

### ***Exemption frameworks for meter malfunctions and testing and inspections***

The AER supports the changes to the exemption framework for meter malfunctions. We also support the introduction of an exemption framework that introduces a process for Metering Coordinators to develop and implement plans to rectify accessibility, safety or readiness issues that prevent Metering Coordinators from testing and inspecting metering installations within required timeframes. Ensuring that metering installations are tested and inspected can involve navigating complex arrangements involving sites that are inaccessible, unsafe or not ready. It is important that Metering Coordinators have the ability to make suitable arrangements to ensure any issues preventing the testing of the metering installations are resolved.

We also consider it appropriate for the exemption framework to provide a means of appropriately managing metering installations that are unsafe to test. Plans proposed by Metering Coordinators and approved by AEMO could provide a clear pathway for Metering Coordinators to rectify safety issues with the metering installation to ensure it can be safely tested.

### ***Potential intersection with life support obligations***

The AER notes that retailers and DNSPs have obligations that govern planned interruptions where a person residing at the premises requires life support equipment. There may be ambiguity about whether the obligation to agree the date for a planned interruption

(proposed clause 7.6.2A(b)(1)) takes precedence over life support obligations in the National Energy Retail Rules (**NERR**).<sup>1</sup> The AEMC may like to consider including wording to clarify that to the extent that the proposed clause conflicts with a retailer's or Distribution Network Service Provider's obligations under the NERR in relation to life support customers, the obligations of the NERR prevail.

### ***Network Service Providers***

We note that the AEMC considered AEMO's proposal to introduce an obligation on DNSPs to 'provide advance notice of planned outages to allow Metering Coordinators to schedule testing and inspection during those planned outages, wherever practical'.<sup>2</sup> The AEMC concluded that several practical challenges could limit the effectiveness of such a requirement. However, we still consider the inclusion of Network Service Providers (**NSPs**) within the testing and inspection framework could further encourage compliance with meter maintenance obligations, given their role in planned interruptions.

We recommend that the AEMC consider the introduction of an obligation on NSPs to assist and cooperate for the installation, maintenance, repair or replacement of metering equipment which requires a planned interruption to the customer's premises. This is similar to the obligation applicable to DNSPs in rule 91A of the NERR. We note that rule 91A(a) of the NERR already requires DNSPs to assist Metering Coordinators when 'the installation, maintenance, repair or replacement of metering equipment is to be undertaken by the metering coordinator'. We consider that the word 'maintenance' would include the testing and inspection of metering installations. The AEMC may consider the inclusion of a similarly framed obligation affecting NSPs within Chapter 7 of the NER. Including NSPs within the testing and inspection framework will provide additional incentive for NSPs to support Metering Coordinators in their testing and inspection efforts by facilitating planned interruptions. It would also capture Transmission Network Service Providers, who may be involved in planned interruptions, but who currently otherwise do not have an obligation to provide MCs with assistance.

### ***Compliance with meter maintenance obligations and the accelerated deployment of smart meters***

On 28 November 2024, the AEMC published the final determination for accelerating the smart meter deployment. This rule change established a process for upgrading legacy meters to smart meters, including the development and approval of Legacy Meter Replacement Plans (**LMRP**). In particular, the final determination exempted legacy meters covered by a LMRP from the routine testing and inspecting obligations during the LMRP period.<sup>3</sup> As such, we note that the new testing obligations associated with the *Supporting compliance with meter maintenance obligations* draft rule change do not apply to legacy meters for the LMRP period. We also note that any new obligations arising out of the *Supporting compliance with meter maintenance obligations* draft rule change do not supersede or otherwise replace the obligations arising out of the *Accelerating smart meter deployment* rule change.

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<sup>1</sup> As an example, with respect to the shared fusing meter replacement procedure, clause 7.8.10D(h) states that 'To the extent that: (1) this clause conflicts with a retailer's obligations under the NERR in relation to life support customers, the obligations of the NERR prevail'.

<sup>2</sup> AEMC, Draft determination - Supporting compliance with meter maintenance obligations, March 2026, p. 53.

<sup>3</sup> Note that in some instances, testing and inspection requirements as mandated under any schemes with jurisdictional Energy and Water Ombudsmen still apply.

We consider it important that Metering Coordinators plan their approach to balance their testing and inspection obligations and their obligations arising out of the accelerated smart meter rollout.

### **Next Steps**

We look forward to continued engagement with the AEMC and AEMO on implementation and monitoring and are happy to provide further input as needed. If you have any questions relating to this submission, please contact Jordan Hallam on 02 9230 3872.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rebecca Holland', with a long horizontal flourish extending to the right.

Rebecca Holland  
General Manager (A/g)  
Compliance & Enforcement

Sent by email on: 07.05.2026