

7 May 2026



Ms Anna Collyer
Chair
Australian Energy Market Commission
Submitted via email

Project Reference Code: ERC0419

Dear Ms Collyer

Supporting compliance with meter maintenance obligations

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) on its supporting compliance with meter maintenance obligations draft determination.

The attached submission is provided by Energy Queensland, on behalf of its related entities, including:

- Regional service delivery Retailer, Ergon Energy Queensland Pty Ltd; and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Metering Dynamics Pty Ltd trading as Yurika Metering.

Energy Queensland remains appreciative of the AEMC's consideration of the rule change proposal submitted by Yurika Metering and recognition of the challenges faced by Metering Coordinators in achieving full compliance with meter testing obligations under the National Electricity Rules.

We are broadly supportive of the AEMC's more preferable draft electricity rule and consider that it upholds the intent of Yurika Metering's rule change proposal.

However, we are of the view that parts of the draft rule would benefit from a more prescriptive approach to ensure that all parties are clear on their respective responsibilities. Energy Queensland's comments in response to the draft determination, and draft rule, are set out in **Attachment A**.

Neither this letter nor our enclosed comments contain confidential information. Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact me at the contact details below or Mark Simpson on 0467 837 450.

Yours sincerely

Alena Christmas

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Enc: **Attachment A** - Energy Queensland's comments.

ATTACHMENT 1

Draft determination: Supporting compliance with meter maintenance obligations

Question 1: Obligations on retailers and large customers as the person who appointed the MC

Do you agree that retailers and large customers should cooperate and provide reasonable assistance to MCs?

Should the Rules clarify or include any other obligations on retailers and large customers that would support MCs with their testing, inspection and malfunction rectification obligations?

Energy Queensland agrees that retailers, large customers and Metering Coordinators (MCs) should cooperate and provide reasonable assistance to each other. This cooperation and support is essential to enable MCs to meet their market compliance obligations, including the testing and inspection of metering installations and the rectification of malfunctions.

While we understand there are benefits in applying a principles-based regulatory approach to allow sufficient flexibility for parties to adhere to their obligations, in this instance, we would encourage the AEMC to consider utilising a rules-based regulatory approach and be more prescriptive in defining the responsibilities of each party.

For example, given the difficulty MCs have had with some large customers in identifying appropriate contact people and arranging supply interruptions and site visits, we suggest that the AEMC should seek to define exactly what is required when providing 'reasonable assistance and cooperation'. For example, the AEMC should consider setting exact timeframes within which a person must respond to MC communications and requests.

Further, in relation to proposed clause 7.6.2A(b), we would suggest that the subclauses would benefit from additional prescriptive requirements beyond the obligation to provide assistance 'promptly'. For example, clause 7.6.2A(b)(1) could be amended to require:

"where requested by the Metering Coordinator, facilitate a supply interruption at the connection point, including by **arranging** a date, on which the supply interruption will take place and facilitating access to the metering installation on that date, **with the arranged date to be prior to the ten-year anniversary of the previous test of the metering**

installation or relevant metering installation components.”

In our view, a lack of clarity around the precise obligations of each party risks perpetuating existing issues, where, for example, a large customer may provide assistance that the MC considers insufficient, but which the customer views as ‘reasonable’ and ‘prompt’.

Additionally, Energy Queensland suggests the following drafting amendments to the below clauses:

- 7.6.2A(b)(1) - While we understand that the proposed rules are to apply to both retailers and large customers, we suggest that the requirement for ‘facilitating access to the metering installation on that date’ would benefit from additional certainty that this does not mean the retailer must be present on the day of the interruption.
- 7.6.2A(b)(1) – For large customers, further define ‘facilitating access’ as including the provision of clear, safe, unhindered and timely access to sites for the purpose of testing.
- 7.6.2A – An additional requirement added for large customers to provide retailers and MCs with current contact details including the name of an appropriate contact person, phone number, email etc. This would greatly reduce administrative effort in identifying the correct person.

Lastly, we request that the AEMC clarify in the final determination that retailers are not responsible for the costs of testing metering installations at customers’ premises.

Defects at metering installations

Energy Queensland supports measures that ensure customers are promptly informed of defects at metering installations, where those defects may delay the MC’s testing, inspection, or malfunction rectification obligations. We welcome the introduction of a procedure for testing, inspecting and repairing metering installations where there are defects for large customers. However, we propose that extending the existing small customer defect procedure introduced under the AEMC’s accelerating smart meter deployment rule change (rule 59AAA of the National Energy Retail Rules) may represent a more efficient and effective solution for large customers.

Adopting the small customer framework may reduce administrative burden on MCs. As an MC may be appointed by either the retailer or the large customer, under the proposed rule, MCs would be required to design and implement new and differing defect notification processes (one for retailers and one for large customers), which would likely increase costs.

As all customers, including large customers, maintain a relationship with a retailer, adoption of the existing small customer procedure for defects at the metering installation would enable a single, consistent notification framework for all customer classes.

We acknowledge if this approach were adopted, several supporting arrangements would still be required to be worked through, including:

- Publication of defect details in MSATS.
- A clear process for notifying retailers of identified defects, noting the current service order response process may not be fit for purpose.
- Consideration of the MIFN (Meter Issue and Fault Notification) transaction as a potential alternative notification mechanism.
- Defined communication processes to support timely advice of defect remediation.

Overall, we consider that these matters could be addressed through minor changes to existing market processes, rather than the introduction of entirely new frameworks.

In addition, we request the AEMC clarify in the final determination that retailers are not responsible for the costs of rectifying defects within or adjacent to metering installations at customers' premises.

Commencement of the proposed Draft Rule

Energy Queensland supports commencement of the proposed rules as soon as is practicable, noting that MCs currently face ongoing issues in meeting the existing meter testing regulatory requirements.

Adopting an April 2027 commencement timeframe may be achievable if the existing small customer metering installation defect processes (B2M and B2B) are leveraged. Under this approach, required changes are expected to be minor and largely limited to the introduction of new enumerations, rather than the creation of new fields or data elements. While consultation on system and process changes would

	<p>still be necessary, the overall build and implementation effort for industry participants would be minimal.</p> <p>Conversely, proceeding with the current draft proposal would require industry participants to design and implement new processes, including at least two new end-to-end (E2E) process flows. This would necessitate significant market system changes and materially increase implementation effort. As a result, additional time beyond the proposed commencement date would be required, with implementation more realistically achievable by November 2027 to allow sufficient time for development, testing, and deployment.</p>
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Question 2: Circumstances where MCs may apply for an exemption with a longer period than specified in AEMO’s Exemption Procedure

<p>Do you agree that it is appropriate to allow MCs to apply for an exemption with a longer period than that specified in malfunctions AEMO’s Exemption Procedure, only in circumstances where a metering installation is not accessible, ready, or safe?</p> <p>Do you agree MCs can effectively manage the size and number of family failures so they can be replaced within the specified timeframes in the NER and AEMO’s Exemption Procedure?</p> <p>If not, why and how can the Rules ensure family failures are repaired or replaced in a timely manner while balancing risk to inaccuracy in market settlement and customer billing from delayed meter repair or replacement? For example, allowing MCs to obtain an exemption for family failures that have a volume of meters over a certain threshold.</p> <p>Does the draft rule appropriately balance reducing MC non-compliance with the Rules and the risk of greater meter inaccuracy from</p>	<p>Energy Queensland welcomes the introduction of greater flexibility regarding the duration for which MCs may be exempt from their obligation to repair malfunctions within the timeframes specified in the National Electricity Rules (NER).</p> <p>Energy Queensland’s metering provider, Yurika Metering, looks forward to continuing to work collaboratively with the Australian Energy Market Operator (AEMO) throughout the testing process, including activities such as re-testing and redefining family groups into sub-families, to support MCs in meeting the timeframes set out in the NER and AEMO’s Exemption Procedure.</p> <p>Further, in relation to the drafting of the proposed rule, Energy Queensland suggests that for clause 7.8.10(b1)(2)(i) both ‘accessible’ and ‘safe’ be further defined to include where a customer obstructs access and/or threatens MC personnel. For large customer sites, the issue is more around the large customer wanting to keep the site operating. For small customer sites, the rise in sovereign citizens can make it hard and sometimes dangerous to gain access to a site.</p>
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<p>exempting malfunctioning meters?</p> <p>Do you agree the balance adopted in the draft rule would be in the long-term interest of consumers?</p> <p>Are there any other circumstances where MCs may need more time to repair a malfunction that the Commission should consider?</p>	
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Question 3: Circumstances where MCs may apply for an exemption to testing and inspection timeframes in the NER

<p>Where a metering installation is not accessible, safe, or ready, do you consider MCs may require an exemption to both testing and inspection timeframes in the NER, or only for testing?</p> <p>Do you agree that it is appropriate to allow MCs to apply for an exemption to testing and inspection timeframes specified in Schedule 7.6.1 of the NER or their asset management strategy (as applicable), only in circumstances where a metering installation is not accessible, ready, or safe?</p> <p>Are there any other circumstances where MCs may need more time to test and inspect metering installations that the Commission should consider?</p>	<p>Energy Queensland is of the view that MCs require an exemption to both testing and inspection timeframes in the NER.</p> <p>Energy Queensland welcomes the proposed introduction of a new exemption category allowing MCs to apply to AEMO for exemptions from testing and inspection timeframes under NER Schedule 7.6.1. This proposal appropriately gives effect to the intent of Yurika’s rule change request, which sought to frame MC compliance testing obligations on a “best endeavours” basis.</p> <p>Notwithstanding this support, we consider, that in order to promote increased transparency, predictability and certainty, additional guidance regarding the framework requirements, and assessment criteria for exemption applications should be included in the proposed rules. While we do not seek highly detailed processes or overly prescriptive requirements, a clearer rule-based framework for how exemption applications are to be prepared, assessed, and approved, would provide greater regulatory consistency.</p> <p>Further, in considering the above, we would encourage the AEMC to acknowledge that there may be circumstances where additional time will be required to test and inspect metering installations, notably during and after natural disaster events such as floods, fires, and cyclones. Factors contributing to these delays include safety and site access constraints, as well as limited availability of field resources, which are often redirected to emergency response and restoration works.</p> <p>As an alternative to the proposed AEMO facilitated exemption process, Energy Queensland would also support an exemption framework embedded directly</p>
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within the NER. This could be structured in a similar manner to the AEMC's metering installation timeframes rule change, which introduced prescribed exceptions under clause 7.8.10C(b) to the standard installation timeframes.

Under this model, MC compliance could be assessed through existing annual audit processes. This would remove the need for AEMO to undertake case-by-case exemption assessments, reducing administrative burden for AEMO and materially lowering compliance and administrative effort for MCs. Exception records could be managed through established business-as-usual processes, improving efficiency while maintaining appropriate regulatory oversight.

