

DRAFT RULE DETERMINATION - METERING COMPLIANCE

AEMC REFERENCE – RRC0070/ERC0419

7 MAY 2026

The Energy Users' Association of Australia (EUAA) is the peak body representing Australian commercial and industrial energy users. Our members are the engine room of the Australian economy, producing many of the products that households and business use every day including bricks, glass, steel, aluminium, paper, fertiliser, food and beverages. Combined, our members employ over 1 million Australians, pay billions in energy bills every year and in many cases are exposed to the fluctuations and challenges of international trade.

EUAA members are focussed on making products that meet their own customers' requirements where energy is just one input to the process, albeit a critical one. Their expectation is that the energy industry continues to provide energy services that are fit for purpose and consistent with the National Electricity Objectives (NEO) so that our members can continue to provide a fit for purpose product for their customers.

Thank you for the opportunity to make this brief, largely supportive submission to the Metering Compliance Draft Rule Determination. We believe the AEMC preferred rule is an improvement on the original rule change requests. While the preferred rule is far more pragmatic and seeks to take into account the issues faced by Metering Coordinators (MC's) and the difficulties faced by large energy users when attempting to facilitate compliance testing, especially where facility de-energisation is required, it still appears to underestimate the challenges of de-energisation.

As we discussed in our original submission and in our response below, facilitating access and/or supply interruption is not a small issue and in many cases requires significant planning and long timelines to facilitate. Therefore, other elements of the rule change such as the proposed exemption framework will still need to consider these significant issues and potentially require some further refinement

Our responses to specific issues are outlined in the following table.

AEMC Draft Position	EUAA Response
Not introduce powers to de-energise customers' premises if large customers do not cooperate with MCs' testing and inspection obligation.	Fully Agree: Forcibly de-energising a customer facility, other than in the case of an imminent and material safety issue, should never be an option due to the financial impact of lost production and the safety impact of uncoordinated de-energisation.
The previous MC must ensure the most recent test certificate for a metering installation is accessible to the new MC within 10 business days, if available.	Fully Agree: This is a logical step and would improve efficiency of the overall process.
Allow MCs to apply to AEMO for an exemption that does not have a specified timeframe in the NER or AEMO's	Fully Agree: This is a fairer way to deal with a situation where the MC and customer have been unable to agree a suitable

<p>Exemption Procedure where there are safety, accessibility and readiness issues with the site that prevent MCs from meeting their obligations in the NER. For these situations, the exemption would end on a date AEMO considers appropriate for the MC's circumstances. The draft rule maintains the existing timeframes in the NER and AEMO's Exemption Procedure for other situations, including for family failures and supply chain issues.</p>	<p>time for facility de-energisation for the purpose of testing and inspection. While not impossible, de-energisation of a facility takes careful planning and is most likely to occur during a period of planned maintenance. Members report that they would require between 18-24 months-notice to plan and execute facility de-energisation.</p>
<p>Not regulate the terms of contracts between MCs and retailers/large customers.</p>	<p>Mostly Agree: Regulating terms of contracts and charges could undermine a competitive market for these services, however some cost guidance and/or more information on base level charges may be worthwhile, especially for customers for whom this may be a relatively new obligation.</p>
<p>Not introduce powers for retailers to de- energise and re-energise large customers for failing to facilitate MC obligations.</p>	<p>Fully Agree: Forcibly de-energising a customer facility, other than in the case of an imminent and material safety issue, should never be an option due to the financial impact of lost production and the safety impact of uncoordinated de-energisation.</p>
<p>The testing and inspection obligation remains absolute. However, the Rules would introduce an exemption framework where MCs are unable to test and inspect metering installations where the metering installation is not accessible, safe or ready.</p>	<p>Fully Agree: This is a fairer way to deal with a situation where the MC and customer have been unable to agree a suitable time for facility de-energisation for the purpose of testing and inspection. While not impossible, de-energisation of a facility takes careful planning and is most likely to occur during a period of planned maintenance.</p>
<p>Not amend the definition of 'metering installation' in the NER.</p>	<p>N/A</p>
<p>The draft rule requires retailers or large customers to support MCs in delivering their testing, inspection and malfunction rectification activities.</p>	<p>Partially Agree: Further clarity is required regarding large customer obligations and what constitutes "reasonable assistance". For example, is it reasonable assistance from the perspective of the MC, the retailer or the large customer? Who decides if "reasonable assistance" has been provided or received? Requiring a retailer "to inform the customer of the date of the visit" or to "facilitate a supply interruption" is unlikely to resolve the access issue if the customer is not in a position to de-energise the facility and/or requires significant timelines beyond the expectation of the MC or retailer.</p>
<p>Not change the current UFE allocation approach to resolve MCs' non-compliance with testing and inspection obligations.</p>	<p>Fully Agree: Based on this latest AEMO report, non-compliant metering is not seen as a cause of UFE and therefore no action has been recommended. Given the conclusions of this most recent AEMO UFE report, to arbitrarily place a revised UFE allocation burden on customers who have not materially contributed to UFE seems entirely unjustified and misdirected.</p>
<p>Do not require DNSPs to provide MCs advance notice of planned outages.</p>	<p>N/A</p>

As we proposed in our submission to the discussion paper, to assist with pursuing a more collegiate approach to these issues we strongly suggest that a cross functional working group is established with the goal of:

1. Sharing information and perspectives on the issues.

2. Developing educational materials to ensure all parties obligations are clear and well communicated.
3. Ensuring only appropriately qualified personnel are able to carry out the work in question including the potential to tighten standards and tougher penalties on non-compliant operators (both the MC and their subcontractors)
4. Developing standardised base level charges.
5. Aligning compliance requirements under the NER with the issues associated with continuous operation of critical infrastructure



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