



4 May 2026

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

Submitted electronically

FROM THE OFFICE
OF THE CHAIR

Level 12
171 Collins Street
Melbourne VIC 3000

Postal Address:
GPO Box 2008
Melbourne VIC 3001

Dear Ms Collyer,

Draft Determination – Supporting compliance with meter maintenance obligations - ERC0419

The Information Exchange Committee (IEC) is a statutory body established under the National Electricity Rules responsible for developing and making recommendations on changing electricity business-to-business (B2B) Procedures. The IEC includes representatives from the Australian Energy Market Operator (AEMO), electricity industry retailers and distributors, competitive metering companies, embedded networks and consumers. The IEC has a statutory role as set out in the National Electricity Rules (NER) (Attachment A).

The IEC has identified potential B2B changes that will require the IEC to undertake a B2B consultation. This requires sufficient time to complete, with additional time required for AEMO and industry participants to implement necessary changes to systems and processes. Consequently, we recommend the Commission reconsider its proposed effective date of 1 April 2027, instead proposing an effective date of 1 December 2027 at the earliest. This date coincides with the proposed effective date for the Improving Life Support Processes reform.

The IEC also notes that the draft determination introduces new obligations for MCs, retailers, and large customers regarding defect management, which are similar to the small customer processes established under the NERR (e.g., clause 59AAA). Should the AEMC proceed with these changes, new supporting processes will need to be developed. As an alternative, the Commission may wish to consider aligning these processes with the current framework used for small customers. This approach would minimise the effort, time, and costs required for implementation across the industry.

The IEC welcomes continued collaboration with the Commission at any stage of its consultations to assist it to understand any potential B2B changes. Should you wish to discuss this further, please contact the IEC secretariat at iec@aemo.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Kee Wong", written over a horizontal line.

Kee Wong
Chair Information Exchange Committee

Attachment A

List of Current Information Exchange Committee Members

Member category	IEC members nominated
Chair	Kee Wong - AEMO director
Distributor	Luke Jenner (Essential Energy)
Retailer	Sean Jennings (Red Energy and Lumo Energy)
Metering	Paul Greenwood (Bluecurrent)
Energy Consumer	Jill Cainey
Discretionary (retailer)	Christophe Bechia (Zen Energy)
Discretionary (Embedded networks)	Vacant
Discretionary (distributor)	Vacant

IEC Statutory Role

In fulfilling its statutory role in relation to managing the ongoing development of B2B Procedures and any changes to them, the IEC works collaborative across the different stakeholder groups in the energy sector to:

- Make recommendations on B2B Procedure changes and oversee the consultation process. In conjunction with AEMO, consider implications of potential policy changes which may affect B2B Procedures and contribute to B2B Procedure delivery management and prioritisation.
- Identify B2B Procedure continuous improvement opportunities
- In conjunction with AEMO, monitors and contributes to B2B Procedure delivery management and prioritisation.