

7 May 2026

Australian Energy Market Commission  
Level 15, 60 Castlereagh Street  
Sydney NSW 2000  
*Lodged electronically*

Dear AEMC project team,

### **JEC submission to Supporting compliance with meter maintenance obligations draft determination**

The Justice and Equity Centre (JEC) welcomes the opportunity to respond to the Australian Energy Market Commission' (AEMC) Supporting compliance with meter maintenance obligations draft determination.

Accurate and timely meter operation underpins correct billing, accurate market settlement, and effective system operation. For households, functioning meters are also a basic service expectation and a foundation of trust in the energy system.

We limit our feedback in this submission to the proposals providing Metering Coordinators (MCs) with greater flexibility to repair, test, and inspect meters. These changes stand to have a material impact on households as they shape how they experience service disruptions and the timeliness with which meter malfunctions are rectified.

For flexibility provisions to be justified, they must be accompanied by clear expectations, meaningful transparency, and safeguards that protect consumers from extended outages and diminished service quality.

#### **Clarify expectations to support timely meter rectification**

Under the proposed rule, MCs would be afforded additional flexibility in rectification timeframes where a metering installation is deemed not to be accessible, safe, or ready. The Commission indicates it “would expect MCs to apply for this exemption *only* [emphasis added] if they are unable to meet the timeframes specified in the NER with the support of the retailer or large customer”.

We question whether this expectation is likely to be realised in practice. As drafted, the proposal enables MCs to defer repairs in circumstances where meeting required timeframes is difficult, without clearly articulating and regulating what constitutes “reasonable efforts” to complete rectification within the prescribed period.

In the absence of clear standards or guidance, there is a risk that these provisions enable the normalisation of delays and longer repair times, and result in poorer service outcomes for consumers.

Without explicit transparency or accountability mechanisms, it is difficult for regulators to distinguish between legitimate barriers to rectification and operational convenience such as the application of practices to save costs. Clearer expectations are needed to ensure flexibility does not come at the expense of service consistency and reliability.

### **Strengthen transparency and oversight of exemption arrangements**

We also have concerns about the proposal to allow bespoke exemption periods and rectification plans to be approved by the Australian Energy Market Operator (AEMO). While the rationale for this discretion is understandable, it imposes a compliance burden on AEMO if the volume of exemption applications is higher than anticipated.

We consider this possibility likely, particularly given the potential incentive for MCs to save time and costs by deferring or avoiding more complicated rectification. If the Commission proceeds with this approach, the final rule should provide stronger transparency measures, so oversight of the exemption framework is not limited to AEMO and MCs alone.

This could include an obligation for MCs to provide de-identified reporting to the Australian Energy Regulator on exemption applications, their duration, and the circumstances that triggered them. Such reporting would help discourage spurious exemption requests, improve public oversight of metering services, and introduce reputational incentives for timely rectification.

Greater visibility of service performance would also support more effective competition in the metering market and provide robust data to inform any further reforms or measures which may be required.

We share the Commission's view that MCs can manage supply chain disruptions and family or multiple family failures within the existing framework. As such, we do not support the introduction of additional exemptions for circumstances where MCs are unable to procure components or where large-scale meter failures occur. These risks are inherent to metering operations and should continue to be managed using the tools already available under the current rectification timeframes.

We welcome the opportunity to meet with the AEMC project team and other stakeholders to discuss these issues in more depth. Please contact Jan Kucic-Riker at the details below regarding any further inquiries.

Yours sincerely

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