

7 May 2026

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

Lodged electronically: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Ms Collyer,

RE: SUPPORTING COMPLIANCE WITH METER MAINTENANCE – DRAFT RULE DETERMINATION

Origin Energy (Origin) appreciates the opportunity to provide a submission to the Australian Energy Market Commission's (AEMC) Supporting compliance with meter maintenance obligations – draft rule determination (ERC0419).

Origin supports the AEMC's objective of improving meter maintenance compliance and recognises the important role retailers can play in facilitating customer engagement and access where they have appointed the Metering Coordinator (MC). However, the draft rule would materially expand retailer obligations, requiring significant changes to systems, processes, MSATS capabilities, contractual arrangements and operational resourcing.

It is not clear that these additional obligations will materially improve compliance outcomes, particularly where many drivers sit outside retailer control. Regulation works best when accountability rests with the party that controls the metering function. Expanding retailer obligations, especially where large customers appoint their own MC, is unlikely to add value or improve outcomes. The final rule should therefore limit retailer obligations to activities within their control, avoid duplication, and ensure accountability remains aligned with operational capability.

It will also be critical for the AEMC to provide clear, practical guidance on what constitutes "reasonable assistance" and "facilitating" metering activities, including the minimum actions retailers are expected to take and how compliance will be assessed. Without this clarity, implementation risk, compliance uncertainty and costs will increase significantly.

Given the scale of implementation required, a later commencement date of November 2027 should also be considered.

Our response to stakeholder questions is provided at Attachment A.

If you have any questions regarding this submission, please contact Gary Davies in the first instance at gary.davies@originenergy.com.au.

Yours sincerely



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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?

Origin supports retailers and large customers providing reasonable assistance to MCs where they have appointed the MC and are operationally well placed to do so. However, the role of the retailer in this regard is limited to administrative and process support. The retailer is not the provider of technical or physical services, this is the responsibility of the MC.

This draft rule seeks to define the actions of retailers and put in place compliance structures. We support this intent.

Improvements to the Final Rule

A key concern is the lack of clear accountability boundaries. The draft rule relies heavily on broad concepts such as “reasonable assistance” and “facilitate”, which could be interpreted expansively over time and effectively shift compliance risk onto retailers.

The AEMC should therefore clearly define these concepts and provide practical guidance on how the framework is intended to operate, including the information MCs and DNSPs must provide, the actions retailers are expected to take, and how compliance will be assessed. Clear accountability boundaries, standardised communication protocols and improved coordination between parties will be critical to support consistent and efficient implementation.

Given the scale of the proposed reforms, Origin also considers the AEMC should commit to a formal post-implementation review to assess whether the changes materially improve compliance outcomes or primarily increase administrative complexity and cost.

Origin also recommends the following changes to improve the final rule:

- Clearly define “reasonable assistance” and “facilitate” so retailers have certainty about the scope of their obligations. These concepts should be limited to reasonable administrative and coordination activities within the retailer’s control and should expressly exclude technical work, field activities, fault diagnosis, testing, rectification, certification, and responsibility for whether the MC ultimately completes the work on time.
- Clearly specify the minimum actions required of retailers to demonstrate compliance. A practical, principles-based list of required steps would improve certainty, support consistent implementation, and reduce the risk of differing interpretations across the market.
- Confirm that retailers are only accountable for matters within their control, with compliance assessed based on retailer actions rather than the ultimate outcome. Retailers should not bear compliance risk for delays caused by customer access issues, safety constraints, workforce shortages, supply chain disruptions, DNSP outages, or MC performance failures.
- Clearly articulate MC obligations, including minimum requirements for communication, status updates, information sharing, escalation and interaction with retailers. Stronger MC accountability is essential to ensure retailers receive timely and accurate information needed to meet their obligations.
- Improve coordination through standardised information sharing, including common templates, consistent reason codes, agreed status updates, and more efficient data exchange between retailers, MCs and DNSPs. This would reduce manual handling, improve data quality, and support more efficient end-to-end processes.
- Avoid duplicating obligations already held by MCs and DNSPs. Where another party is better placed to perform a function, such as technical communications, fault diagnosis, field coordination, defect assessment, outage management, or providing network and outage information,

responsibility should remain with that party. In particular, DNSPs should provide planned and unplanned outage information directly to MCs.

- Clearly distinguish between retailer-appointed MC arrangements and customer-appointed MC arrangements. Where a large customer appoints its own MC, the retailer typically has no contractual relationship with the MC and limited visibility or control over metering activities, including maintenance planning, defect management and remediation progress. In these circumstances, responsibility for meter maintenance and compliance should rest directly with the customer and its appointed MC.
- Apply a more principles-based and flexible framework for large customers, recognising that prescriptive small customer processes, including defect notification and tracking requirements, may not be appropriate for sophisticated customers operating under tailored contractual and account management arrangements. The framework should focus on outcomes and allow parties to rely on existing contractual and account management arrangements.

Implementation Timing

Given the scale of required system, process, MSATS and contractual changes, the proposed April 2027 commencement date is unlikely to be achievable. Origin considers November 2027 would provide a more realistic implementation timeframe, allowing sufficient time for design, build, testing, industry readiness and coordination with other major industry reforms and implementation programs.

Question 2: Circumstances where MCs may apply for an exemption with a longer period than specified in AEMO's Exemption Procedure

- 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?
- 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?
 - 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.
- Does the draft rule appropriately balance reducing MC non-compliance with the Rules and the risk of greater meter inaccuracy from exempting malfunctioning meters? Do you agree the balance adopted in the draft rule would be in the long-term interest of consumers?
- Are there any other circumstances where MCs may need more time to repair a malfunction that the Commission should consider?

The AEMC proposes longer exemption periods to address situations where MCs cannot meet standard timeframes due to factors outside their control, such as access or safety constraints. This aims to reduce unnecessary non-compliance while ensuring exemptions remain limited, justified and subject to oversight.

Origin supports allowing AEMO to grant longer malfunction exemptions where delays are genuinely outside an MC's control, including not only access, safety and site readiness issues, but also large-scale family failures, supply chain disruptions, workforce shortages and DNSP constraints.

Exemptions should be targeted, time-limited, and supported by clear remediation plans and regular updates. This is important to minimise the risks of prolonged meter inaccuracy, estimated billing, settlement errors and poor customer outcomes. Importantly, retailers should not bear compliance or customer risks arising from delays outside their control. Clear MC reporting and communication obligations will therefore be essential.

Question 3: Circumstances where MCs may apply for an exemption to testing and inspection timeframes in the NER

- 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?
- 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

Origin supports allowing MCs to apply for exemptions to both testing and inspection timeframes where a metering installation is not accessible, safe, or ready. In these circumstances, neither activity can reasonably proceed, and a consistent framework across both obligations is appropriate.

Exemptions should be limited to circumstances genuinely outside the MC's control, supported by clear evidence, remediation plans, and regular status updates. Retailers require timely notification of exemption applications, approvals, and progress to effectively manage customer communications, billing, and compliance obligations.

It is also important that retailers are not held accountable for delays arising from circumstances outside their control, particularly where the underlying issue sits with the customer, MC, or site conditions.