

4 May 2026

Australian Energy Market Commission (AEMC)
By email: submissions@aemc.gov.au

→ **Submission on draft rule and draft determination: Supporting compliance with meter maintenance obligations (Reference: ERC0419)**

Solstice Energy supports the intent of the draft rule to improve compliance with meter testing, inspection and malfunction rectification obligations, and agrees that Metering Coordinators (MCs) face practical barriers outside their control, particularly relating to site access and defects.

We support the introduction of clearer obligations on the party appointing the MC, including retailers, to improve coordination, customer awareness and ultimately meter accuracy and billing outcomes.

Balancing expanded retailer obligations with cost protection

As the draft rule expands retailer obligations to facilitate access, inform customers and coordinate activities, it is important that the framework also introduces clear safeguards around unsuccessful or “wasted” site visits.

In practice, these visits represent a material cost exposure that is often borne by retailers or customers, particularly where access is not achieved or defects remain unresolved.

To ensure an appropriate balance, we recommend that:

- The Rules or AEMO procedures explicitly define what constitutes a failed or unsuccessful site visit, including minimum requirements for pre-visit verification (e.g. confirmed appointment, customer notification and site readiness checks),
- MCs be required to evidence reasonable steps taken to secure access prior to classifying a visit as unsuccessful, and
- Cost recovery for repeat visits be limited where access issues were reasonably foreseeable or could have been avoided through appropriate planning.

These measures would ensure that increased retailer obligations do not result in a disproportionate transfer of operational risk and cost.

Interaction with the exemption framework

The expanded exemption framework appropriately recognises that MCs cannot always meet obligations where sites are not accessible, safe or ready. However, there should be a clearer linkage between exemptions and site access outcomes, including:

- ensuring exemptions are not used to justify repeated unsuccessful visits without progression, and
- reinforcing expectations that MCs minimise repeat visits during exemption periods.



Maintaining MC accountability

MCs, as the technically responsible party, remain best placed to determine and manage the requirements for testing, inspection and repair activities.

Additional retailer obligations should support this process, but should not dilute MC accountability for efficient planning, scheduling and execution of metering activities.

Conclusion

Solstice Energy supports the direction of the draft rule. To ensure the framework operates effectively and fairly in practice, we recommend:

- explicit definition and governance of unsuccessful site visits;
- stronger linkage between access outcomes, exemptions and cost recovery; and
- clear retention of MC accountability for efficient delivery of metering services.

If you require any further information please contact Daniel Gillie, Head of Stakeholder and Government Relations, on 0419 817 292 or daniel.gillie@solsticeenergy.com.au



Background: Solstice Energy

Solstice Energy, previously Tas Gas, has been instrumental in meeting Tasmania's energy needs for more than two decades.

Solstice Energy is a diversified energy business, spanning across Tasmania and Victoria, with offices in Hobart, Launceston, Devonport and Bendigo.

The Solstice Energy Group includes:

- Solstice Energy Retail,
- Tas Gas Networks,
- Gas Networks Victoria, and
- Gas Pipeline Victoria.

Our businesses serve Tasmanian consumers through retailing electricity and gas as well as gas distribution. Solstice Energy also supplies and retails natural gas to 10 regional towns in Victoria and operates a high-pressure gas transmission line from Carisbrook to Horsham in Victoria.

For the past 20 years the Solstice Energy Group has been safely operating the gas distribution network in Tasmania (through its subsidiary Tas Gas Networks) and has been retailing gas to residential, commercial and industrial users (through its subsidiary Solstice Energy Retail) to support their energy needs during this time.

In addition to local customer service, Solstice Energy Retail specialises in strategic energy procurement which means we can provide certainty and security around future gas contracts.

In Tasmania, Tas Gas Networks owns and operates one of Australia's most modern gas networks as part of the Solstice Energy Group. Over the past two decades, with a network spanning more than 837 kilometres, Tas Gas Networks has reliably supplied natural gas for heating homes, powering businesses, and fuelling large industrial facilities throughout the state.

Gas Networks Victoria operates a distribution network supplying natural gas to customers in 10 regional towns, including Terang, Maldon, Marong, Heathcote, Robinvale, Swan Hill, Kerang, Nathalia, Orbost and Lakes Entrance. This includes compression and high-pressure transportation to meet the gas needs of residential and commercial customers in regional Victoria. Due to the ongoing operational and financial nonviability of these networks, they will be decommissioned in stages through late 2026.

In Western Victoria, the Gas Pipeline Victoria, owned and operated by the Solstice Energy Group, consists of a 182-kilometre high-pressure transmission pipeline from Carisbrook to Horsham. This pipeline plays a crucial role in supplying gas to regional Victorian towns like Avoca, Ararat, Stawell, and Horsham.