



Australian Government



AUSTRALIAN
ENERGY
REGULATOR

Compliance and enforcement priorities

JULY 2025

The AER's compliance and enforcement priorities help guide our enforcement and proactive compliance efforts, and signal areas where we will be paying the closest attention to the behaviour of market participants.

The priorities align with the objectives in the AER's Strategic Plan 2020–2025, specifically objectives 1–3.

The plan sets out how we approach our compliance and enforcement roles and functions in accordance with the national energy laws.

In addition to our work in priority areas, we will continue to act where there are serious issues impacting consumers experiencing vulnerability, including life support consumers and consumers affected by family violence.

We will continue to assess matters having regard to our [Compliance and Enforcement Policy](#) and take action where justified.

This may include progressing matters outside of these priorities both emerging and ongoing, particularly to progress important ongoing work in areas previously identified as priority areas and to facilitate Australia's energy transition.

01

Protect vulnerable consumers, while enabling consumers to participate in energy markets.

02

Effectively regulate competitive markets primarily through monitoring and reporting, and enforcement and compliance.

03

Deliver efficient regulation of monopoly infrastructure while incentivising networks to become platforms for energy services.



Improve outcomes for consumers experiencing vulnerability, including by ensuring access to hardship protections and affordable payment plans that reflect capacity to pay, and improving retailer hardship policies.

Cost-of-living pressures continue to affect many Australians. As a result, we expect the number of consumers experiencing financial hardship may continue to increase. In the last 12 months, we have observed an overall increase in energy debt levels, although fewer consumers are accessing payment plans and hardship programs. Those entering hardship programs are doing so with higher levels of debt.

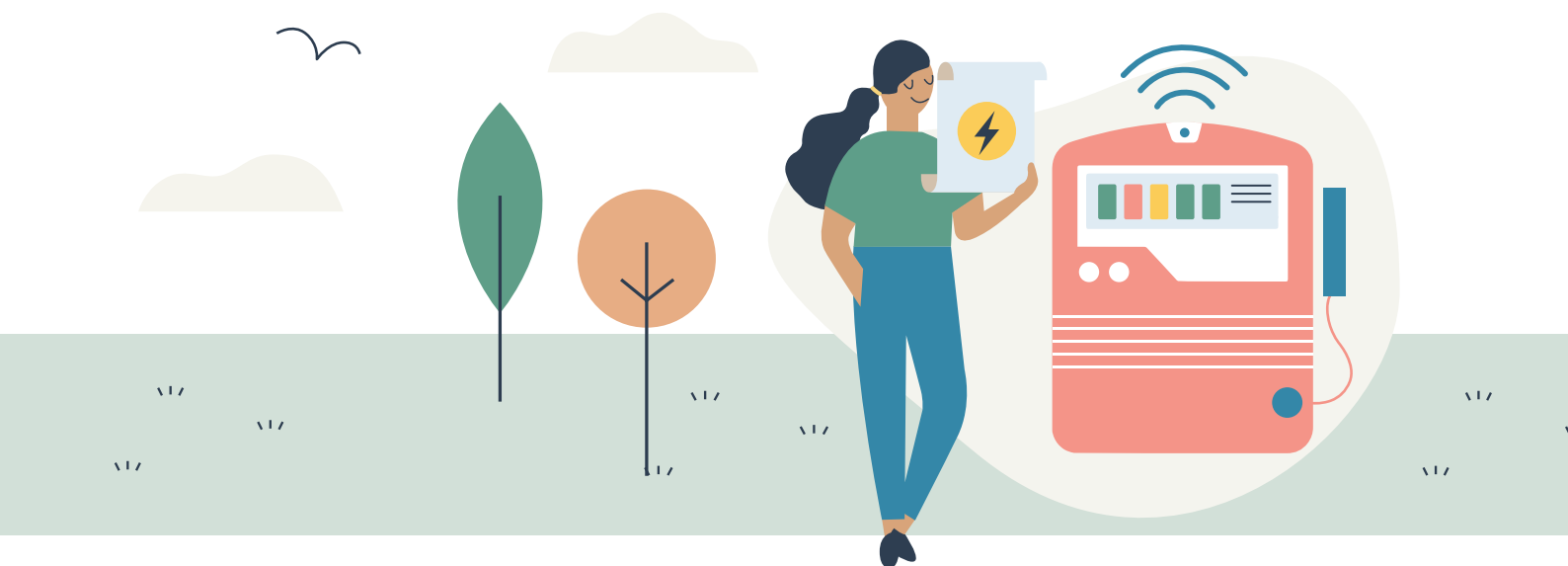
Our focus will be on ensuring that all eligible consumers are able to access the protections they are entitled to under the National Energy Retail Law and National Energy Retail Rules. This includes access to hardship programs and affordable payment plans that reflect the consumer's capacity to pay. We will continue to closely monitor retail performance data and other intelligence sources to ensure consumers experiencing payment difficulties are afforded the required hardship and payment plan protections. We will investigate serious conduct where consumers are at risk of or experience harm as a result of retailer non-compliance.

We will continue to work with retailers to review and improve their hardship policies for better consumer outcomes. This includes ensuring that hardship policies state that the retailer will continue to provide consumers the benefits of relevant hardship protections for any outstanding debt owed when they leave the retailer.

We are also ensuring that hardship policies clearly outline appropriate contact processes the retailers will follow when payment plan instalments are missed.

The AER acknowledges the importance of access to interpreter services, particularly when consumers are experiencing vulnerability. The AER will continue to monitor retailer and distributor compliance using our intelligence sources, including reports from consumer and ombudsman groups, to ensure that consumers are able to access these important protections.

All activities related to this priority will have a strong link to the work in the AER's consumer vulnerability strategy, *Towards energy equity*.



Protect consumers during the universal transition to smart meters by focusing on compliance with smart meter rollout requirements, resultant tariff changes and ongoing metering practices.

Smart meters are a crucial tool to enable an efficient, connected and cost-effective energy system and are being rolled out at pace to support the energy transition.

As with any complex large-scale program, some participants' conduct could result in compliance issues and harm consumers. It is critical that all participants, including retailers, distributors and metering coordinators, fully understand and comply with all their responsibilities. Our focus will be on ensuring consumers are provided with appropriate and adequate information about meter installation, any resultant tariff changes and site defects at the metering installation.

We are committed to ensuring that distribution network service providers' Legacy Meter Replacement Plans for the accelerated smart meter rollout are developed and consulted on with retailers, metering parties and stakeholders to meet the required objective of being timely, cost-effective, fair and safe. We will support the installation experience for consumers, including by ensuring meter upgrades are conducted within required timeframes, interruptions to supply are minimised and consumers are equipped to make informed decisions on rectifying site defects at the metering installation.

Recognising that smart meters create opportunities for consumers to have different types of electricity plans, we will support consumers by providing information on different retail tariff types. This will aid understanding and empower consumers to consider their usage behaviour and what retail plan best suits their needs. We understand that transparency and certainty around changes to consumers' energy plans are crucial. To ensure important consumer safeguards are upheld, we will monitor retailer compliance with the new explicit informed consent requirements for retail tariff changes and any applicable requirements to offer a flat tariff.

We will monitor participant compliance with metering and related billing obligations to support the consumer experience following a smart meter installation. This includes accurate and timely provision of metering data, estimated bills, timely resolution of billing disputes and accurate description of tariff arrangements in accordance with the Better Bills Guideline.

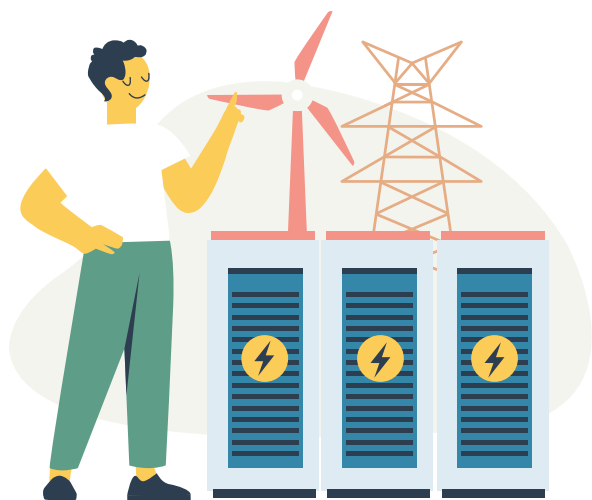


Support power system security and an efficient wholesale electricity market by focusing on compliance with network outage obligations, generator performance standards and availability obligations.

With the energy transition, it is critical that generators meet performance standards in accordance with requirements for power system security and that representations around the availability of plants in bids, rebids and submissions to AEMO's projected assessments of system adequacy are accurate and timely. This includes providing system services, such as frequency control ancillary services. AEMO relies on generator performance and representations around availability to operate the market, assess system adequacy and manage power system incidents and conditions.

It is also critical that network service providers submit timely and transparent planned outage information to AEMO, including through the Network Outage Schedule, so that AEMO can coordinate maintenance work and manage system impacts, and the market can respond.

We will proactively monitor compliance with these obligations, including through market surveillance and compliance reviews, to support AEMO's management of power system security. We will also investigate serious conduct that contributes to major market events, such as making false or misleading bids or rebids or failure to provide timely and transparent information on planned outages.



Promote competition and ensure safe and reliable network infrastructure by improving compliance with network connection and ring-fencing obligations.

Our focus will be on ensuring that network service providers comply with their obligations to provide timely and transparent connections. With the increase in the number and complexity of new connections arising from the energy transition, new participants must be able to connect efficiently and safely to the National Electricity Market. We are focusing on compliance with connection requirements, particularly to support AEMO's ability to maintain a secure electricity system and ensure that connection processes do not result in significant delays to generation entering the market.

We will also focus on compliance with the AER's Ring-fencing Guidelines. The Ring-fencing Guidelines promote competition by preventing network service providers from favouring their own related businesses or using related businesses to cross-subsidise their services to the disadvantage of competitors. We will continue to monitor compliance with ring-fencing and related obligations, including those relating to the handling of confidential information, to protect the interests of consumers. We will investigate serious non-compliance where appropriate.



Monitor and enforce compliance with reporting requirements under Part 10 of the National Gas Rules.

Since March 2023, gas pipeline service providers must ensure transparent provision of required information under Part 10 of the National Gas Rules. This includes making information available to pipeline users on their website in a clear manner as outlined in the [Pipeline Information Disclosure Guidelines](#). The purpose of these obligations is to reduce information asymmetries and the imbalance of bargaining power that gas pipeline users can face in negotiations with pipeline service providers.

This information better enables gas pipeline users to assess the reasonableness of prices and other terms and conditions and effectively negotiate with service providers. The AER uses this information to monitor for compliance with reporting requirements, as part of its reporting on the competitiveness and efficiency of wholesale gas markets, and to inform its position on future form of regulation reviews. Part 10 reporting also enables the AER to assess conditions in the market and the extent to which current regulatory settings are promoting efficient access to, and investment in, gas pipeline services.

The AER will prioritise surveillance and compliance activities to monitor compliance with these reporting obligations and investigate instances of serious non-compliance.