

# Annual compliance and enforcement report

2024–25

July 2025

© Commonwealth of Australia 2025

This work is copyright. In addition to any use permitted under the *Copyright Act 1968* all material contained within this work is provided under a Creative Commons Attributions 4.0 Australia licence with the exception of:

- the Commonwealth Coat of Arms
- the ACCC and AER logos
- any illustration diagram, photograph or graphic over which the Australian Competition and Consumer Commission does not hold copyright but which may be part of or contained within this publication.

The details of the relevant licence conditions are available on the Creative Commons website as is the full legal code for the CC BY 4.0 AU licence.

### **Important notice**

The information in this publication is for general guidance only. It does not constitute legal or other professional advice. You should seek legal advice or other professional advice in relation to your particular circumstances.

The AER has made every reasonable effort to provide current and accurate information, but it does not warrant or make any guarantees about the accuracy, currency or completeness of information in this publication.

Parties who wish to re-publish or otherwise use the information in this publication should check the information for currency and accuracy prior to publication.

Inquiries about this publication should be addressed to:

Australian Energy Regulator  
GPO Box 3131  
Canberra ACT 2601  
Email: [aerinquiry@aer.gov.au](mailto:aerinquiry@aer.gov.au)  
Tel: 1300 585 165

AER reference: AER17007121

### **Amendment record**

Version	Date	Pages
1	23 July 2025	28

# Contents

<b>Executive summary</b>	<b>1</b>
Compliance and enforcement priorities 2025–26	4
<b>1 About us</b>	<b>5</b>
<b>2 Compliance and enforcement priorities for 2024–25 and related outcomes</b>	<b>7</b>
2.1 Improve outcomes for consumers experiencing vulnerability	8
2.2 Make it easier for consumers to understand their bills and energy plans	9
2.3 Support power system security and an efficient wholesale electricity market	11
2.4 Improve market participants' compliance with performance standards and standards for critical infrastructure	11
2.5 Monitor and enforce compliance with reporting requirements under the new Gas Market Transparency Measures	12
<b>3 Enduring compliance and enforcement priorities</b>	<b>16</b>
3.1 Life support	16
3.2 Family violence	16
<b>4 Other compliance and enforcement activities in 2024–25</b>	<b>18</b>
4.1 Retail Law and Rules	18
4.2 Wholesale electricity and gas	18
4.3 Accelerated smart meter rollout	20
4.4 Gas network compliance	21
4.5 Embedded networks	21
4.6 Ring-fencing	22
<b>5 Compliance and enforcement priorities 2025–26</b>	<b>24</b>
<b>Appendix A – Summary of compliance and enforcement activities in 2024–25</b>	<b>25</b>
<b>Glossary</b>	<b>28</b>

## Executive summary



The Australian Energy Regulator’s (AER) role in ensuring a secure, reliable and affordable energy future for all Australians is crucial as the energy market transitions and consumers continue to face cost-of-living pressures. We continue to deliver outcomes and actions across our strategic objectives and compliance and enforcement priorities. This report provides an overview of the AER’s compliance and enforcement activities during the 2024–25 financial year.

With ongoing cost-of-living and energy affordability pressures, we remain focused on **protecting consumers**, including consumers experiencing vulnerability, while enabling all consumers to understand their plan and engage in energy markets. In 2024–25, the AER completed the following compliance and enforcement activities related to consumer protections.

### Billing and overcharging

- Secured Federal Court ordered [penalties totalling \\$25 million](#) in proceedings against AGL Retail Energy Limited and 3 other subsidiaries of AGL Energy Limited (together AGL) for breaches of the overcharging obligations in the National Energy Retail Rules (Retail Rules) related to Centrepay payments – following judgment, AGL appealed against the findings of the Court, penalties and other orders, and AGL’s appeal and the AER’s cross-appeal will be heard on a date to be set by the Full Federal Court.
- Received payment of \$135,600 for [2 infringement notices](#) issued to Origin Energy Electricity Limited for alleged breaches of the overcharging obligations in the Retail Rules.
- [Wrote to retailers](#) to provide guidance for compliance with the Better Bills Guideline.
- Commenced a review to examine retailer processes for identifying and notifying customers of the Deemed Better Offer in accordance with the Better Bills Guideline.

- [Made a decision](#) requiring retailers that re-use plan names to provide additional information on bills to address customer confusion that may result from retailers creating newer versions of existing plans with the same name.

### Hardship and payment plans

- Received payment of \$474,600 for [7 infringement notices](#) issued to Red Energy Pty Ltd (Red Energy) and accepted a court enforceable undertaking for alleged breaches of the hardship and payment plan obligations in the National Energy Retail Law (Retail Law).
- Received payment of \$406,800 for [6 infringement notices](#) issued to M2 Energy Pty Ltd (Dodo) and accepted a court enforceable undertaking for alleged breaches of the hardship and payment plan obligations in the Retail Rules.
- Progressed a round of spot checks of retailers' compliance with the hardship obligations.
- [Wrote to retailers](#) in response to ex-Tropical Cyclone Alfred to remind them of their obligations and encourage them to work with their customers to understand their needs during the recovery.

### Life support and family violence

- Secured Federal Court ordered [penalties totalling \\$12 million](#) in proceedings against Origin Energy Electricity Limited, Origin Energy Retail Limited and Origin Energy LPG Limited (collectively, Origin) for breaches of its life support obligations in the Retail Rules – a court-enforceable undertaking given by Origin relating to this matter also commenced when judgement was made.
- Received payment of \$542,400 for [8 infringement notices](#) issued to Powershop Australia Pty Ltd for alleged breaches of the life support obligations in the Retail Rules.
- Released [updated guidance](#) on the family violence protections, covering retailers' key responsibilities to customers affected by family violence and the AER's compliance expectations.

### Embedded networks

- Received payment of \$135,600 for [2 infringement notices](#) issued to Locality Planning Energy Pty Ltd (LPE) for alleged breaches of the National Electricity Law by owning embedded networks at residential sites without being registered with the Australian Energy Market Operator (AEMO) or exempted by the AER.
- [Continued proceedings](#) in the Federal Court against embedded network operator, CAM Engineering and Construction Pty Ltd (Cam Engineering), for failing to become a member of the Energy and Water Ombudsman NSW (EWON) scheme, as required by the Retail Law. On 4 July 2025, the Federal Court ordered [penalties totaling \\$250,000](#) against CAM Engineering.<sup>1</sup>

---

<sup>1</sup> This outcome and penalty figure will be detailed in the AER's compliance and enforcement reports in 2025–26.

## Other guidance and guidelines

- Published [guidance for retailers](#) on their obligations and responsibilities to customers when deploying or replacing smart meters, including prioritising the safety of customers and installers.
- Following consultation with stakeholders, published the [final decision on the AER's Compliance Procedures and Guidelines](#) for retailers and distributors in jurisdictions that have adopted the Retail Law.

As the energy sector continues to undergo a major transition, the AER remains focused on monitoring compliance to support **power system security** and ensure that **electricity and gas markets operate efficiently and competitively**. In 2024–25, the AER completed the following compliance and enforcement activities related to electricity and gas markets.

## Electricity market

- Secured Federal Court ordered [penalties totalling \\$9 million](#) in proceedings against Callide Power Trading Pty Ltd in relation to breaches of the National Electricity Rules for failing to comply with its performance standards for the Callide C power station.
- Updated the [Semi-Scheduled Generator Compliance Bulletin and checklist](#) to reflect necessary changes following AEMO's enablement of bid energy Max Avail for semi-scheduled generators.
- Published the [final guidance note](#) on export limits to provide clarity on the regulatory framework necessary to facilitate the effective implementation of export limits.
- Published [4 guidance notes](#) to help participants understand their obligations under the Retailer Reliability Obligation (RRO).
- Finalised the [review of the RRO Auditors Panel](#), including publishing a revised version of the Auditors Panel Handbook, launching the Auditors Panel Conflict of Interest Register and updating the current Auditors Panel membership and contact details.
- Released the draft decision on the [interim Contracts and Firmness Guidelines](#) for consultation to reflect the RRO exemption for scheduled bidirectional units rule change.

## Gas market

- Secured Federal Court ordered [penalties totalling \\$5.5 million](#) in proceedings against Jemena Eastern Gas Pipeline (1) Pty Ltd and 3 other subsidiaries of SGSP (Australia) Assets Pty Ltd (collectively, Jemena) in relation to breaches of the National Gas Rules for failing to determine Auction Quantity Limits in accordance with the procedures developed by AEMO and the Part 24 information standard.
- Following consultation with stakeholders, finalised and published the [AER's Compliance procedures and guidelines for gas pipeline service providers](#), which provide guidance on the National Gas Laws, Rules and Regulations and the AER's processes when using information gathering and audit powers.

## **Compliance and enforcement priorities 2025–26**

The AER has released its compliance and enforcement priorities for 2025–26, which updated our previous priorities to reflect current market and environmental conditions. The priorities for 2025–26 are:

- 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.
- 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.
- Support power system security and an efficient wholesale electricity market by focusing on compliance with network outage obligations, generator performance standards and availability obligations.
- Promote competition and ensure safe and reliable network infrastructure by improving compliance with network connection and ring-fencing obligations.
- Monitor and enforce compliance with reporting requirements under Part 10 of the National Gas Rules.

# 1 About us

The AER is Australia's national energy regulator. Our jurisdiction covers several sectors of the national energy market, including:

- the relationships energy retailers and distributors have with their customers in competitive retail markets, and those of alternative energy providers operating under retail and network exemptions
- participation in competitive wholesale markets for electricity and gas, including AEMO's obligations in handling the day-to-day operations of those markets
- provision of monopoly transmission and distribution network services to customers and other market participants, and network planning requirements on service providers and AEMO.

Our functions relate mostly to energy markets in eastern and southern Australia – our jurisdiction covers Queensland, New South Wales (NSW), the Australian Capital Territory, Victoria, South Australia and Tasmania.<sup>2</sup>

For our compliance and enforcement program, our purpose is to act as the fair, independent and accountable regulator of the energy market, fostering compliance by market participants and reducing consumer and market harms. We make energy consumers better off by using appropriate regulatory approaches and deploying the right regulatory tools to solve problems.

We monitor, investigate and enforce compliance with obligations under the national energy laws in all sectors of the energy market, including the Electricity Law and Electricity Rules, Gas Law and Gas Rules, and Retail Law and Retail Rules, and their associated regulations and guidelines. This report summarises our compliance and enforcement activities for the 2024–25 financial year.<sup>3</sup>

In support of the objectives set out in our Strategic Plan 2020–2025, our compliance and enforcement work focuses on non-compliance that poses significant harm to:

- consumers, in particular those who are vulnerable or disadvantaged, such as those requiring life support equipment and those experiencing family violence
- consumers' active participation in energy markets
- the operation and transparency of competitive energy markets
- the efficient operation of monopoly gas and electricity networks and inhibits access to those networks.

We may also take action where the operation of important laws or rules is unclear or contested. We draw on our experience in monitoring and enforcing compliance with national

---

<sup>2</sup> An exception to this is the energy retail market in Victoria, which is regulated under state legislation by the Essential Services Commission of Victoria. In the Northern Territory, we regulate monopoly networks only, with other responsibilities managed by the Utilities Commission of the Northern Territory.

<sup>3</sup> The Retail Law requires us to publish an annual report on compliance with the Retail Law and Retail Rules. This report also includes our compliance and enforcement activities under the Electricity Law and Gas Law.



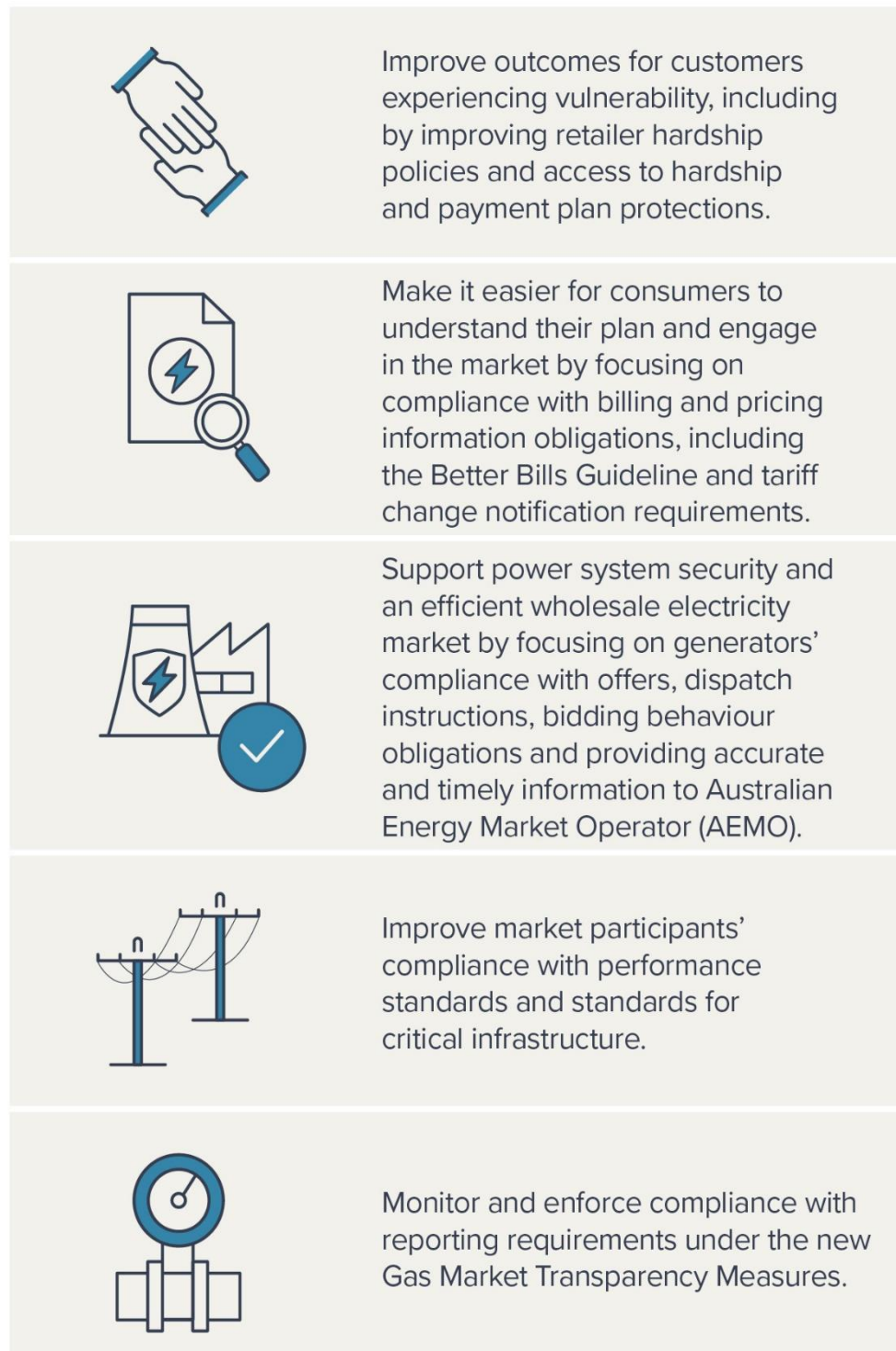
energy laws to inform debate about Australia’s energy future and support the energy transition.

Our *Compliance and enforcement policy* sets out how we approach our roles and functions in monitoring, investigating and enforcing compliance with national energy laws. The policy works in conjunction with our compliance and enforcement priorities, which help guide our enforcement work and proactive compliance efforts and signal areas where we consider behavioural change in the market is required. We discuss outcomes under this year’s priorities in chapter 2 of this report. You can read about our new priorities for 2025–26 in chapter 5.

## 2 Compliance and enforcement priorities for 2024–25 and related outcomes

In 2024–25, the AER set a total of 5 compliance and enforcement priorities with 2 relating to consumers, 2 relating to wholesale electricity and networks, and one relating to gas (Figure 1). These priorities align with the objectives in the [AER's Strategic Plan 2020–2025](#).

**Figure 1 AER compliance and enforcement priorities 2024–25**



This section outlines the compliance and enforcement outcomes for each of these priority areas.

## **2.1 Improve outcomes for customers experiencing vulnerability**

The AER has achieved a range of outcomes to ensure consumers experiencing vulnerability are provided with the full suite of hardship and payment plan protections they are entitled to under the Retail Rules and Retail Law. These outcomes have strong links with our [Towards energy equity strategy](#).

### **Compliance with hardship obligations**

Hardship policies are vital in setting out how retailers identify and support consumers experiencing payment difficulties due to hardship. We have reviewed and approved 10 retailer hardship policies this financial year and have another 3 currently under review. This includes AGL's policy, which we proactively reviewed, following on from the approval of Origin Energy's updated policy in 2023–24. Together, these retailers service approximately 48% and 60% of residential electricity and gas customers, respectively.

We have observed that many current retailer hardship policies could be improved and have continued to engage with retailers to review and update their policies. We are improving policies by ensuring they set out that customers who no longer require energy supply from the retailer have access to an arrangement for debt repayment that is consistent with protections set out in the hardship policy. We are also ensuring that policies clearly outline an appropriate process the retailer will follow to contact customers when they miss a payment plan instalment. In updating their hardship policies, we continue to expect retailers to be guided by recently approved policies and legislative requirements.

Following recent enforcement outcomes involving Dodo and Red Energy, on 21 May we sent a letter to retailers outlining our expectations of how retailers should identify and treat hardship customers. In particular, we outlined that customers must continue to receive any applicable hardship protections when they change addresses and that payment plans must be established with a consideration of capacity to pay.

### **Enforcement outcomes related to hardship and payment plans**

#### **Dodo – alleged breaches of hardship and payment plan obligations**

In April 2025, Dodo [paid 6 infringement notices](#) totalling \$406,800 issued by the AER for alleged breaches of the Retail Rules that protect consumers experiencing hardship and payment difficulties.

In addition, the AER accepted a court enforceable undertaking from Dodo, where Dodo admits it breached rules 71(1) and 72(1)(a) of the Retail Rules and acknowledges the AER's concerns about its compliance systems and processes relating to its hardship, payment plan and direct debit practices. The enforceable undertaking also requires Dodo to appoint an independent expert to conduct a review of its hardship policy, its compliance with hardship and direct debit obligations and to refund direct debit fees applied to hardship customers impacted by any unauthorised direct debit attempts over a 2-year period.

## **Red Energy – alleged removal of hardship and payment plan protections**

In April 2025, Red Energy Pty Ltd [paid 7 infringement notices](#) totalling \$474,600 issued by the AER for allegedly removing hardship and payment plan protections from consumers when they moved house, leaving these consumers vulnerable to disconnection and debt collection processes, including credit default listings.

In addition, the AER also accepted a court enforceable undertaking from Red Energy, requiring the company to review and improve its hardship policy, deliver staff training and arrange for an independent review of its processes to ensure ongoing compliance with its hardship obligations.

## **2.2 Make it easier for consumers to understand their bills and energy plans**

Bills are a key source of information and communication between consumers and energy retailers. The information on bills helps customers to make confident decisions, such as making sure they are on the best deal to suit their circumstances. The AER's Better Bills Guideline sets out how retailers must prepare and issue bills to small customers.

### **Compliance with Better Bills Guideline**

In October 2024, the AER wrote to retailers to provide guidance for compliance with the Better Bills Guideline and requested that retailers undertake a proactive review of their small customer bill templates against the Guideline and our findings. We also set out our key findings from a review of retailers' post-implementation bill templates and assessments of retailer breach reports concerning contraventions of the Guideline, focusing on placement of information in accordance with tiering requirements.

In February 2025, we commenced a review to examine retailer processes for identifying and notifying customers of the Deemed Better Offer. This was done in accordance with the Better Bills Guideline, by asking retailers to demonstrate the relevant calculations for 2 customers (selected according to sampling criteria). We also requested retailers provide bills for a sample of customers over a 12-month period to demonstrate the form and frequency of their better offer messages. Findings of the review will likely inform industry guidance on compliance expectations and good practice, and we will consider further investigation if serious conduct of concern is identified.

On 23 May 2025, we published a decision under section 37 of the Better Bills Guideline requiring retailers that re-use plan names to provide additional information on bills to address customer confusion that may result from retailers creating newer versions of existing plans with the same name. These retailers will be required to add the following information below any better offer message alerting customers to a cheaper plan:

'If this plan has the same name as your current plan, you are on an older version of the plan which has different rates. You can still save money by switching to a newer version.'

## Enforcement outcomes related to overcharging

The AER has achieved enforcement outcomes to ensure all retailers refund customers if they have been overcharged and to provide consumers the full protections afforded under the Rules.

### AGL – overcharging of Centrepay customers

On 19 December 2024, the Federal Court ordered AGL Retail Energy Limited and 3 other subsidiaries of AGL Energy Limited (together, AGL) to [pay penalties totalling \\$25 million](#) for failing to comply with their overcharging obligations under rule 31 of the Retail Rules and failing to have systems and procedures in place to enable them to efficiently and effectively monitor its compliance in accordance with section 273 of the Retail Law. AGL's conduct related to Centrepay deductions from customers receiving Centrelink payments. The customers had stopped receiving services from AGL at the time the Centrepay deductions were occurring. The Federal Court found that AGL overcharged 483 Centrepay customers between 9 January 2017 and 28 October 2021, committing a total of 16,156 breaches by failing to inform and refund these customers within the required timeframes. This is the largest total penalty ever imposed for breaches of the national energy laws.

On 7 February 2025, AGL appealed against the findings of the Court, penalties and other orders. The AER has filed a cross-appeal and a notice of contention in response to AGL's appeal. The matters raised by the AER are technical in nature and are intended to address potential findings and orders by the Full Federal Court. The appeal and cross-appeal will be heard on a date to be set by the Full Federal Court.

### Origin – alleged overcharging and failure to notify

In October 2024, Origin Energy Electricity Ltd (Origin) [paid 2 infringement notices](#) totalling \$135,600 issued by the AER for alleged breaches of the overcharging obligations in the Retail Rules. The AER issued the infringement notices because it had reasonable grounds to believe Origin breached rule 31(1) of the Retail Rules in relation to failing to notify 2 customers within 10 business days that it had overcharged them \$4,317 and \$2,885, respectively.

### Referrals from Services Australia – alleged overcharging of Centrepay customers

The AER [received referrals](#) from Services Australia in May 2024 related to 3 energy retailers that allegedly continued to obtain deductions from Centrepay payments for inactive customers. In July 2024, the AER announced that it was working with these retailers to ensure affected customers were refunded in a timely fashion and we are continuing to look into these referrals.

On 5 December 2024, Ergon Energy Queensland Pty Ltd (Ergon) initiated judicial review proceedings, challenging the AER's decision to issue an information gathering notice to it under section 206(1) of the Retail Law. The notice sought to investigate potential breaches of Ergon's overcharging obligations. On 27 May 2025, the Federal Court dismissed Ergon's judicial review application.

## 2.3 Support power system security and an efficient wholesale electricity market

The National Electricity Market is in a transition phase, with an increased emergence of intermittent renewable generation plants (or weather-reliant generators) known as semi-scheduled generators (SSG). In July 2022, we published the SSG Compliance Bulletin to outline our expectations for compliance with critical obligations under the Electricity Rules. While these expectations are similar to those for scheduled generators, there are some differences due to the reliance of SSGs on specific weather conditions as a fuel source.

In February 2025, we [updated our SSG Compliance Bulletin](#) and checklist to reflect necessary changes following AEMO's enablement of bid energy 'max avail' for SSGs. The use of max avail can help SSGs to manage their commercial availability through the energy bid.

The updates to this bulletin also reflect the AER's expectations around the use of self-forecasting by SSGs that choose to submit self-forecasts to AEMO for use in the dispatch process. In February 2025, we issued a letter to remind industry of our expectations around the use of self-forecasting. The reminder focused on the need to ensure that self-forecasts are as accurate as can be reasonably expected to reflect anticipated generation capacity, monitoring of performance of self-forecasts and the application of continuous improvement. The AER considers that the use of self-forecasting is broadly beneficial to the National Electricity Market, where it allows for a more accurate forecast of solar or wind capability, helping to improve power system security.

## 2.4 Improve market participants' compliance with performance standards and standards for critical infrastructure

### Callide Power Trading – generator performance standards

On 4 February 2025, the Federal Court ordered Callide Power Trading Pty Ltd to [pay penalties totalling \\$9 million](#) for failing to ensure the Callide C4 generating unit met or exceeded its performance standards in breach of rule 4.15(a)(1) of the Electricity Rules. Callide Power Trading also admitted that it failed to plan and design its facilities and ensure they were operated to comply with its performance standards, in breach of clause 5.2.5(a)(1) of the Electricity Rules.

The \$9 million penalty is the highest ever imposed for a single breach of national energy laws – the maximum possible penalty under the law is \$10 million.

The failure and destruction of the Callide C4 generating unit on 25 May 2021 had widespread impacts. The disconnection caused widespread disruption to energy supply and required AEMO to activate emergency reliability measures.

### Investigation into Broken Hill power system event

In October 2024, the [AER commenced an investigation](#) into the power system events that affected transmission infrastructure supplying Broken Hill and its surrounding areas. The investigation is reviewing whether there have been any potential breaches of the Electricity



Rules. The AER is also liaising with the Independent Pricing and Regulatory Tribunal – which is investigating Transgrid’s compliance with licence conditions and other obligations under state legislation – to ensure a coordinated approach to our investigation.

## Consumer energy resources technical standards

Consumer energy resources (CER) are small-scale energy resources owned by consumers, such as solar photovoltaic systems and batteries, which can produce, store or vary how they use energy. Ensuring that CER devices meet applicable technical standards helps maintain system security and delivers benefits to consumers by allowing more CER to be installed on the network.

Following its review into [CER technical standards](#), the AEMC made several recommendations, including that distribution network service providers (DNSPs) introduce commissioning processes to verify correct device installation before connecting new CER devices to the grid. The AER supports this action and has engaged with stakeholders, including DNSPs, to understand their experience in implementing commissioning processes and to share relevant learnings.

While there is no requirement in the Electricity Rules for DNSPs to implement commissioning processes, we encourage DNSPs to consider the following messages to inform best practice (which the AER has also included in its October 2024 [Export limit guidance note](#)<sup>4</sup>).

We also encourage DNSPs to share learnings on implementing commissioning processes with each other and to review and refine these processes periodically.

## 2.5 Monitor and enforce compliance with reporting requirements under the new Gas Market Transparency Measures

New participant reporting to the Gas Bulletin Board commenced on 15 March 2023. Since then, the AER has actively monitored participant compliance with reporting requirements, focusing on the reporting of short-term gas transactions and reserves and resources. These areas are important because they provide timely price signals and information on gas availability and supply, helping to support efficient market outcomes and inform policy decisions.

### Short-term transaction reporting

Gas Bulletin Board reporting requirements have been extended to the reporting of bilateral short-term gas supply and swap transactions, providing information to buyers on the short-term costs of gas commodity. In 2023, we worked with AEMO to clarify for participants how short-term gas transactions should be reported, and on 18 January 2024 guidance was provided in [AEMO’s Gas Transparency Measures – FAQ fact sheet](#).

In late 2023, we met separately with participants to discuss the AER’s compliance expectations in response to anomalies observed in short-term transaction reporting. On 6

---

<sup>4</sup> AER, [Export limit guidance note](#), Australian Energy Regulator, October 2024, section 4.3.3.

December 2023, we published [AER's Special report: Wholesale gas short term transactions reporting](#).

Between May and November 2024, we conducted a review of Bulletin Board short term transaction (STT) information reported to the Gas Bulletin Board, including both STT supply and swap transactions. The review process involved contacting 31 STT selling entities to request a self-review of their reported Gas Bulletin Board data. We also reviewed over 1,500 short-term swap transactions reported to the Bulletin Board between July and November 2024.

The review identified various STT reporting issues, including failure to report, late reporting, incorrect reporting and inconsistent reporting. In response, we engaged directly with 20 entities about the identified transactions. This engagement led to reporting errors being rectified and, in several cases, led to the entities involved self-reporting to the AER.

Much of the inconsistency relates to varying interpretations of the Gas Rules, particularly regarding the reporting of one-year contract and bespoke short-term swap transactions. For example, some entities do not report contracts that span from 1 January to 1 January the following year while others do. Following our review, the number of sellers reporting one-year contracts increased to 19, although it is likely that some participants are still not reporting as required.

These differing interpretations of the reporting obligations undermine the consistency and accuracy of data on Gas Bulletin Board. To address these issues, the AER will publish a compliance bulletin on reporting Bulletin Board short-term transactions to support consistent and accurate reporting in 2025–26.

## Reserves and resource reporting

Gas Bulletin Board reporting obligations have been expanded to include the reporting of reserves and resource information by gas field owners. This provides buyers with valuable data on gas field volumes, development and pricing associated with contracts with field owners or suppliers. Gas field owners are now required to:

- report their gas field interests and reserves and resource estimates to AEMO
- report the gas price assumptions used in preparing these estimates to the AER.

Through participant outreach since 2023, the AER considers that, except for one or 2 minor-volume participants, all registerable field interests are now being reported. Our attention is now focused on developing mechanisms to better detect new and emerging field interests to ensure ongoing comprehensive coverage.

Under the Gas Rules, the AER is required to publish, at least annually, the price assumptions used by gas field owners to estimate gas reserve volumes. In April 2025, we published our second [Wholesale gas reserves price assumption report](#), which contains analysis of both contracted and uncontracted reserve price assumptions submitted to the AER. We also released an updated [reserve price assumption submission template](#) alongside this report.

Compliance with reporting deadlines and information requirements has improved in 2024. In 2023, we identified 34 instances of late and/or incomplete reporting by 25 field owners, compared with 24 breaches by 12 field owners in 2024.



Despite these improvements, some field owners have still failed to submit required information to AEMO and/or the AER within 40 business days of their nominated reporting date, for the second consecutive year. Additionally, some field owners have been unresponsive to communications from the AER and AEMO about their reporting obligations, despite multiple follow-ups.

We remind field owners of their obligation to provide timely and accurate reporting. After 2 years of this reporting regime, we expect all field owners to be fully aware of their reporting obligations. The AER will now be more likely to consider any recurrence of misreporting as indicative of a poor compliance culture and enforcement action will be considered where serious, ongoing non-compliance is identified.

## **Part 27 East Coast Gas System reliability and supply adequacy review**

We have reviewed compliance with requirements under Part 27 of the National Gas Rules pertaining to East Coast system reliability and supply adequacy. This was supported by consultations with AEMO, our analysis of the data reported under Part 27, compliance self-reports and our compliance assessments.

Overall, our review found that participants have demonstrated acceptable compliance with Part 27 of the National Gas Rules and AEMO's East Coast Gas System Procedures, with most participants providing information within the required reporting timeframes.

We have identified instances of late reporting and failure to report. These primarily occurred by Bulletin Board large user facilities and gas retailers and were commonly associated with participants reporting for the first time.

While it is not required by Division 2 of Part 27, AEMO has reported that it has taken steps to verify the accuracy of reported information, including comparing participants' future forecasts with historical forecasts and actuals.

We have observed that AEMO has effectively exercised its East Coast Gas System powers in accordance with rule requirements by convening gas supply adequacy and reliability conferences, issuing directions during relevant market events and conducting post-event reviews. It has convened 5 gas supply adequacy and reliability conferences and issued multiple directions in response to 3 market events between January 2024 and April 2025.<sup>5</sup> AEMO has shared its view that, during these events, participant compliance with AEMO directions was satisfactory and it has not identified any instances of participants exacerbating directions costs.

## **Further Gas Market Transparency Measures**

In August 2024, we published our final [Day Ahead Auction Record Keeping Guidelines](#), which set out how facility operators and transportation facility users must record and maintain

---

<sup>5</sup> First event: Between 1 January 2024 and 23 May 2024 AEMO convened 3 conferences related to the rupture of the Queensland Gas Pipeline. Second event: Convened on 20 June 2024 related to the rapid depletion of Iona UGS inventory. Third event: Convened on 24 April 2025 related to inland flood in and around Moomba Hub.

nomination and renomination data relevant to the AER's monitoring functions. The changes address concerns we identified with participant reporting since we published the initial guidelines on commencement of the Day Ahead Auction in 2019. Final amendments to the Guidelines include enhanced data submissions protocols to ensure the accuracy, completeness and timeliness of records. The Guidelines also aim to enhance the quality of information received and to aid facility operator and transportation facility user compliance with the Gas Rules and Law.

Section 64F of the Gas Law requires the AER to make a Compliance Procedures and Guideline to provide guidance and information to service providers about compliance with their requirements under the Gas Law and the National Gas Regulations, including:

- information about the legislative framework for gas pipelines
- guidance about responding to the Annual Compliance Order (ACO)
- information about the compliance audits carried out under the Gas Law.

As part of a package of reforms, section 64F was added to the Gas Law in 2023. Consultation on the Procedures and Guidelines commenced in August 2024, after the final decision was made to make the new ACO for gas pipeline service providers. In December 2024, the [AER Compliance Procedures and Guidelines for gas pipeline service providers](#) was published on our website.

Regarding participant reporting under both the Gas Market Transparency Measures and the East Coast Gas System reforms, we have observed some late registrations and reporting errors and have engaged with participants to encourage self-reporting of potential non-compliance and amendments to any incorrectly submitted data. All known entities that are eligible for reporting as gas field owners are now registered with AEMO.

## 3 Enduring compliance and enforcement priorities

In addition to our work in annual priority areas, the AER continues to act where there are serious issues impacting consumers experiencing vulnerability, including consumers requiring life support equipment and consumers affected by family violence.

### 3.1 Life support

The Retail Rules contain obligations retailers and distributors must meet when they are informed of the life support needs of someone residing in, or intending to reside in, a premises. Failure to comply with these obligations risks serious impacts on the health and safety of these vulnerable customers.

#### Origin – failure to register, deregistration of life support customers

On 18 December 2024, the Federal Court ordered that Origin [pay penalties totalling \\$12 million](#) for breaches of its life support obligations under the Retail Rules and Retail Law. These proceedings, filed on an agreed basis, followed admissions that Origin breached the Retail Rules on more than 5,000 occasions, including by failing to register customers and by deregistering the premises of customers with a person requiring life support equipment without following all the steps required to check whether life support equipment was required. In some cases, Origin disconnected customers' energy supply.

In addition to the financial penalty, a court-enforceable undertaking from Origin took effect relating to 1,973 admitted breaches of rule 124(1)(b) of the Retail Rules, requiring it to provide information packs to life support customers. Origin also undertook to make a \$1 million community-based contribution to organisations that assist sections of the community who rely on life support equipment, as well as undertaking to conduct an independent review of its life support compliance systems.

#### Powershop – alleged failure to register and notify distributor

In May 2025, Powershop [paid 8 infringement notices](#) totalling \$542,400 issued by the AER for alleged breaches of the life support obligations under the Retail Rules. The AER alleged that, between August 2021 and November 2022, Powershop failed to comply with its life support obligations under the Retail Rules, including by failing to register 3 customers as requiring life support equipment when advised by each customer and failing to notify the distributor that those 3 customers required life support equipment when advised by each customer.

### 3.2 Family violence

Family violence protections commenced under the Retail Rules on 1 May 2023 to improve energy retailers' response to, and support of, customers experiencing family violence across National Energy Customer Framework jurisdictions. Among other things, retailers are required to develop and publish a family violence policy. Supporting consumers affected by family violence is an enduring AER compliance and enforcement priority, which means it is an area the AER will always prioritise.

On 1 April 2025, the AER's Retail Compliance Procedures and Guidelines were updated to include new reporting obligations for breaches of the family violence obligations. Depending on the obligation, the retailer must report breaches to the AER either immediately, half-yearly or as soon as reasonably practicable where the retailer identifies a material breach.

Version 4 of the AER's Retail Performance Reporting Guidelines will take effect on 1 July 2025 and requires retailers to report quarterly on the number of customers affected by family violence that they are assisting, as well as the number of those customers who are on a payment plan or who access the retailer's hardship program. This data supports our compliance monitoring functions and helps us to assess the effectiveness of the family violence protections.

On 12 February 2025, the AER released [updated guidance](#) on the family violence protections. The guidance, which is informed by the AER's experience, engagement with family violence experts and other regulatory bodies' engagement with victim survivors, covers energy retailers' key responsibilities to customers affected by family violence and sets out the AER's compliance expectations.

In response to the Essential Services Commission of Victoria's [Designed to Disrupt discussion paper](#), the AER published an [open letter](#) to the energy sector calling on energy businesses to make their services safer for customers affected by family violence. We recognise the AER's role in preventing essential services and products from being weaponised against customers experiencing family violence and financial abuse. Our strategy to support a safer energy market for customers affected by family violence sets out our priorities to build organisational awareness within the AER, supports a regulatory framework that enables safety by design, and encourages regulated business to prioritise safety.

## 4 Other compliance and enforcement activities in 2024–25

In addition to the work undertaken in each of the compliance and enforcement priority areas, the AER has continued to progress important ongoing work in areas previously identified as priority areas and where there are serious issues impacting the market.

### 4.1 Retail Law and Rules

#### Compliance procedures and guidelines

In July 2024, the AER released its [final decision on its Compliance procedures and guidelines](#) for retailers and distributors in jurisdictions that have adopted the Retail Law. The Guidelines set out the manner and form in which regulated entities are required to submit information and data on their compliance to the AER and the process for managing compliance audits under the Retail Law.

The updated Guidelines commenced on 1 April 2025. The updates aim to balance the need for regulated entities to provide timely, accurate and consistent compliance information to the AER with the need to manage administrative costs for retailers and distributors. The key changes in the updated Guidelines include:

- introduction of reporting requirements for 7 additional obligations, including obligations relating to family violence, presentation of standing offers, energisations and re-energisations
- introduction of a requirement to report any breach that has a material adverse effect on consumers or the National Energy Market as soon as reasonably practicable – the application of this requirement has been limited to civil penalty provisions in the Retail Law and Rules
- removal of quarterly reporting frequency
- clarification of the reporting requirements for de-energisations to improve the quality of reporting.

### 4.2 Wholesale electricity and gas

#### Retailer Reliability Obligation

The Retailer Reliability Obligation (RRO) encourages investment in electricity generation capacity and demand response by introducing a contracting requirement on certain businesses that directly participate in the wholesale electricity market.

If AEMO (or a responsible minister) identifies a reliability gap in supply for a region in 3 years' time, liable entities are put on notice to enter into sufficient qualifying contracts to cover their share of the peak demand forecast for that region during the forecast gap period. If the forecast gap persists, then during the year before it is expected to commence, those liable entities must report their net contract positions (NCPs) to the AER. If, during a reliability gap period, actual peak demand exceeds the 1-in-2-year peak demand forecast, a liable entity

must be sufficiently contracted so that its NCP at least equals its share of forecast demand for the relevant trading interval.

In addition to the AER's role in administering the RRO, we monitor and enforce compliance with the RRO provisions by liable entities. Our overarching compliance message to industry is to act early. Once the AER or relevant minister triggers the RRO 3 years out, businesses should review their operations to understand whether they are a liable entity, and if so, to plan their contracting strategies to ensure they are sufficiently contracted one year out.

In August 2024, we published 4 guidance notes intended to help entities understand their obligations under the RRO. These guidance notes focus on the key learnings for liable entities and generators from the 2024 T-1 reliability instrument in South Australia.

Participants should review their practices against the information set out in the following [guidance notes and checklists](#):

- Are you a liable entity?
- NCP reporting guidance
- NCP adjustment guidance
- Accuracy of Market Liquidity Obligation register details.

We also finalised a review of the RRO Auditors Panel in August 2024, following stakeholder feedback. As a result of the review, we:

- published a revised version of the [Auditors Panel Handbook](#)
- launched the [Auditors Panel Conflict of Interest register](#)
- updated the current [Auditors Panel membership and contact details](#).

Our review also identified the need for more auditors to join the Auditors Panel. We encourage individuals and firms with expertise in electricity markets, demand/generation forecasting and energy derivatives and contracts to join the Auditors Panel.

In June 2025, we published a [draft decision to amend the interim Contracts and Firmness Guidelines](#) to reflect a recent rule change to the Electricity Rules for the RRO. The purpose of the 'Retailer reliability obligation exemption for scheduled bi-directional units rule' was to exempt scheduled bi-directional units (including grid-scale batteries and pumped hydro energy storage) from being liable under the RRO.

The focus of this consultation is to update the Contracts and Firmness Guidelines to address this rule change. We plan to publish the final decision of the amended Guidelines in August 2025.

## **Auction quantity limits**

The Day Ahead Auction (DAA) was established in 2019 and is a central platform facilitated by AEMO that allows companies that move gas to bid for available pipeline and compression capacity. The auction is mandatory and is finalised a day in advance. The Auction Quantity Limit (AQL) for a facility determines how much capacity is available to be won at auction. The AER has undertaken a number of compliance and enforcement activities in relation to the AQL obligations.

In April 2025, the Federal Court ordered 4 Jemena subsidiaries (collectively, Jemena) to [pay penalties totalling \\$5.5 million](#) for breaches of the Gas Rules related to the DAA. During court proceedings, Jemena admitted that between 1 March 2019 and 22 February 2022 it breached rules 649(1) and 653(1)(a) of the Gas Rules by failing to determine AQLs in accordance with the procedures developed by AEMO and the Part 24 information standard. The contravening conduct resulted in incorrect AQLs being provided to AEMO and had the potential to result, in some instances, in auction participants paying above what they otherwise would have paid.

In July 2024, a market participant submitted a self-report to the AER, advising that it had underreported AQLs by 4 TJ for 27 days between May and June 2024 and by 9 TJ for one day in July 2024. We conducted an assessment and found that the underreporting of these AQLs contributed to DAA constraints on 3 gas days – 4 June, 5 June, and 14 June – resulting in a total loss of 7,178 GJ of auction capacity and collectively \$27,235.22 in overpayments by 5 shippers. After the review, we met with the participant to communicate the review outcome. The participant reimbursed the affected shippers for their overpayments.

Shell Energy Retail and Powershop, both subsidiaries of Shell Energy Australia (Shell), completed an administrative undertaking that required Shell to submit quarterly demand data comparing forecasted to actual demand on the Short Term Trading Market (STTM) between 1 January 2023 and 31 December 2024. This undertaking was accepted following Shell's failure to submit daily forecasts as required by the Gas Rules. The undertaking held Shell accountable for the completeness of its daily forecasted demand at the Adelaide, Brisbane and Sydney distribution hubs. This undertaking by Shell further prompted enquiries into the accuracy of daily demand forecasts on the STTM by other market participants due to the revelation that there are trends and patterns in unpredictability and inaccuracies of demand forecasting. As part of the undertaking, Shell entities also volunteered information on its monitoring of demand forecasting accuracy; we are continuing to monitor the accuracy of Shell and other STTM participant forecasts because they can impact market price outcomes.

### 4.3 Accelerated smart meter rollout

In November 2024, amendments were made to the Electricity Rules and Retail Rules to promote a fast, efficient and effective deployment of smart meters. The rules commence progressively between 5 December 2024 and 1 July 2026 to enable a universal uptake of smart meters in the National Electricity Market by 1 December 2030.

Under the new rules, DNSPs must develop a Legacy Meter Replacement Plan (LMRP) that details the replacement schedule for meters in their network across the replacement period. LMRPs were required to be submitted to the AER for approval by 30 June 2025. Once approved, they are published on our website.

A key change under the new rules is that, from 1 June 2025, consumers are no longer able to opt-out of a retailer-led smart meter installation. Consumer safeguards have been introduced, such as a requirement on retailers to provide enhanced communications and information about meter installations and, from 1 December 2025, to seek explicit informed consent before changing a customer's retail tariff assignment following a smart meter installation. Queensland implemented additional consumer safeguards under local regulations that, from 20 September 2024, require retailers to provide a standing offer with



flat rate tariff structure to customers with a smart meter and additional information in tariff variation notices.

On 19 May 2025, we published [guidance for retailers](#) on their obligations and responsibilities to customers when deploying or replacing smart meters, including prioritising the safety of customers and installers. Given the delay in the explicit informed consent protections taking effect, we also encouraged retailers to take a considered approach to tariff changes following smart meter installation with the customer experience front of mind.

We are currently developing guidance for retailers on consent and site defect notification procedures, for publication later in 2025. We are also developing a fact sheet for consumers, and consumers can contact the AER with general enquiries about the smart meter rollout. We will continue to monitor the progress of the rollout and respond to any issues as they arise. We will also continue working with other market bodies (including AEMC and AEMO), ombudsman schemes and consumer representatives throughout the rollout.

## 4.4 Gas network compliance

During 2024–25, the AER continued to monitor compliance with key regulatory obligations, through the second voluntary information request for the 2023–24 financial year to scheme and non-scheme service providers. The voluntary information request was based on the [new ACO](#), which was published on 7 June 2024. It had a response rate of 55% (18 out of 33) by service providers. This includes 63% of non-scheme pipelines (68 out of 108).

The responses to the information request were generally satisfactory and we will work with a small number of service providers to improve their ‘basis of preparations’. While we do not have a complete dataset, the information received provides a representative sample of compliance rates and areas of focus ahead of the first complete reporting under the new ACO for the 2024–25 financial year, due 31 October 2025. We expect direct feedback and the AER Compliance Procedures and Guidelines for gas pipelines will aid service providers in responding to the new ACO discussed in section 2.5 above.

## 4.5 Embedded networks

### CAM Engineering – exempt seller obligations

On 20 October 2023, the AER [instituted proceedings](#) in the Federal Court against CAM Engineering and Construction Pty Ltd (CAM Engineering) for allegedly failing to become a member of the Energy and Water Ombudsman NSW (EWON) scheme, in breach of section 112(2) of the Retail Law.

As the developer of Cooranbong Gardens retirement village in NSW, CAM Engineering held an exemption to sell and supply electricity to residents through the embedded network located at the village and had to comply with the AER’s Retail Exempt Selling Guideline.

The AER alleged that CAM Engineering obtained its retail exemption on 11 March 2021, but did not join EWON until 22 July 2022, despite reminders and warnings. During this 16-month period, energy customers of the village did not have access to the important dispute resolution service that EWON provides.

On 4 July 2025, the Federal Court ordered CAM Engineering [pay a penalty of \\$250,000](#).



Prior to instituting proceedings in the Federal Court, the AER issued CAM Engineering with an infringement notice for the alleged breach. CAM Engineering did not pay the penalty specified in the infringement notice.

## LPE – alleged failure to obtain exemption

In September 2024, Locality Planning Energy Pty Ltd (LPE), an electricity retailer that services embedded networks, paid [two infringement notices](#) totalling \$135,600 issued by the AER for breaches of the Electricity Law. The AER alleged LPE breached section 11(2) of the Electricity Law by owning embedded networks at residential sites on Bribie Island and in Brisbane between 2021 and July 2022, without being registered with AEMO or exempted by the AER from the requirement to be registered.

## 4.6 Ring-fencing

Ring-fencing obligations require legal and functional separation of the regulated activities of a network business from the activities of any related entity. This promotes competition by preventing regulated businesses from discriminating in favour of their related entities and preventing cross-subsidisation from regulated customers. Increased competition helps to facilitate innovation and provide more choices for consumers.

In accordance with the [Ring-fencing Guideline \(electricity distribution\)](#) and the [Ring-fencing Guideline \(electricity transmission\)](#), DNSPs and transmission network service providers (TNSPs) are required to submit annual compliance reports to the AER for the previous calendar year, as well as an assessment of compliance by a suitably qualified independent authority.

13 DNSP and 6 TNSP annual compliance reports were submitted for this reporting period. Each of these reports were also accompanied by an assessment of compliance by a suitably qualified independent authority.

The AER has reviewed each of the annual compliance reports and reports provided by the independent authorities for the 2024 calendar year and noted improved DNSP compliance with the Ring-fencing Guideline (electricity distribution). We have seen reduced reports of breaches related to protection of ring-fenced information and fewer breaches related to branding and cross-promotion.

Our focus areas for the 2025 calendar year includes:

- **standard of reporting:** it is important to ensure accuracy of reporting and for reporting to continue to be of a high standard
- **timeliness and report sign-off:** a number of annual compliance reports were submitted late and without the required sign-off from the CEO
- **instances of repeated non-compliance:** we continue to see a number of distributors reporting multiple breaches of their ring-fencing obligations – we expect DNSPs and TNSPs to rectify non-compliance and implement processes to prevent recurrence
- **battery waiver reporting (for DNSPs):** in relation to Australian Renewable Energy Agency batteries, DNSPs must ensure that when the batteries become operational that data is being reported as per the class waiver – the class waiver requires that regulatory

asset base allocation should be in line with the proportion of network support that the battery is providing.

## Ring-fencing waivers

Network service providers can apply for waivers of some ring-fencing obligations. In the 2024 calendar year, the AER granted 10 waivers to DNSPs and 2 waivers to TNSPs.

Waivers granted under the Ring-fencing Guideline (electricity distribution):

- to SA Power Networks to trial flexible export limits by testing various DNSP retailer partnership models
- to Essential Energy to continue using its premises and staff to provide limited mandatory training to private electrical contractors, as required by the NSW contestable works scheme
- to Ergon Energy to lease its Microgrid and Isolated Systems Test to the recipients of the Queensland Government's microgrid pilot fund and the Australian Government's Regional and Remote Communities fund
- to Ergon Energy to provide generation services in Queensland's isolated networks using behind-the-meter generation assets
- to Evoenergy to continue providing 'other services' to a single site for a large customer for a period of transition before that customer assumes responsibility for those services
- to Power and Water Corporation to waive the requirement to publish office and staff sharing registers and allow for continued administrative efficiency under the NT Electricity Rules
- to Ergon Energy to act as the metering coordinator for 3 communities in regional Queensland
- 3 streamlined waivers for DNSPs to lease excess capacity from batteries to third parties:
  - to Endeavour Energy to install 7 batteries
  - to Ergon Energy to acquire and operate a battery energy storage system
  - to Ausnet to install 10 network-owned pole-top batteries.

Waivers granted under the Ring-fencing Guideline (electricity transmission):

- to TransGrid to continue to own and operate generation assets for back-up supply to Broken Hill
- to TransGrid to continue to provide telecommunications services to 6 customers for a period of 12 months.

## 5 Compliance and enforcement priorities 2025–26

The [compliance and enforcement priorities for 2025–26](#) were published on 1 July 2025. The priorities align with the objectives in the AER’s Strategic Plan 2020–2025, specifically objectives 1 to 3.



**Figure 2 AER compliance and enforcement priorities 2025–26**



# Appendix A – Summary of compliance and enforcement activities in 2024–25

**Table 1 Civil proceedings finalised**

Obligation	Regulated entity	Date proceedings commenced	Status/outcome
Retail Rules: rules 31(1), 31(2) and 31(3) and Retail Law: section 273	AGL Retail Energy Limited 3 other subsidiaries of AGL Energy Limited	16 December 2022	<a href="#">\$25 million (penalty)</a> Currently under appeal
Gas Rules: rules 649(1), 650(3), 653(1) and 653(2)	Jemena Eastern Gas Pipeline (1) Pty Ltd, Jemena Queensland Gas Pipeline (1) Pty Ltd, Jemena VicHub Pipeline Pty Ltd, and Jemena Darling Downs Pipeline (3) Pty Ltd	1 June 2023	<a href="#">\$5.5 million (penalty)</a>
Electricity Rules: rule 4.15(a)(1) and clause 5.2.5(a)(1)	Callide Power Trading Pty Ltd	9 February 2024	<a href="#">\$9 million (penalty)</a>
Retail Rules: rules 124(1)(a), (b), (c), 124(3)(a), 124B(1)(c) and Retail Law: section 273(1)	Origin Energy Electricity Limited, Origin Energy Retail Limited and Origin Energy LPG Limited	1 July 2024	<a href="#">\$12 million (penalty)</a>

**Table 2 Infringement notices paid**

Obligation	Regulated entity	Date of payment	Penalty paid
Electricity Law: section 11(2)	Locality Planning Energy Pty Ltd	23 September 2024	<a href="#">\$135,600 (2 notices)</a>
Retail Rules: rule 31(1)	Origin Energy Electricity Limited	25 September 2024	<a href="#">\$135,600 (2 notices)</a>

Obligation	Regulated entity	Date of payment	Penalty paid
Retail Rules: rules 71(1) and 72(1)(a)	M2 Energy Pty Ltd (trading as Dodo Power & Gas)	25 March 2025	<a href="#">\$406,800 (6 notices)</a>
Retail Law: sections 43(2)(c) and 50(1)(a)	Red Energy Pty Ltd	21 March 2025	<a href="#">\$474,600 (7 notices)</a>
Retail Rules: rules 124(1)(a), (b), (c), 125(1)	Powershop Australia Pty Ltd	1 May 2025	<a href="#">\$542,400 (8 notices)</a>

**Table 3 Court enforceable undertakings**

Obligation	Regulated entity	Date of undertaking	Status/outcome
Electricity Rules: clause 6.17 Electricity Distribution Ring-Fencing Guideline: clause 3.1(b)	Icon Distribution Investments Limited and Jemena Networks (ACT) Pty Ltd (together trading as Evoenergy)	14 June 2024	<a href="#">Ongoing</a>
Retail Rules: rule 124(1)(b)	Origin Energy Electricity Limited Origin Energy Retail Ltd Origin Energy LPG Ltd Origin Energy Services Limited Origin Energy Holdings Pty Limited	20 June 2024 (effective from 18 December 2024)	<a href="#">Ongoing</a>
Retail Law: sections 43(2)(c) and 50(1)	Red Energy Pty Ltd	28 March 2025	<a href="#">Ongoing</a>
Retail Rules: rules 32(3) 71(1) and 72(1)(a)	M2 Energy Pty Ltd (trading as Dodo Power & Gas)	1 April 2025	<a href="#">Ongoing</a>

**Table 4 Administrative decisions**

Obligation	Regulated entity	Status/outcome
Better Bills Guideline: section 33, 34 and 35	Momentum Energy	<a href="#">AER decision</a>
Better Bills Guideline: section 37	All retailers who re-use plan names	<a href="#">AER decision</a>

**Table 5 Publications and consultations**

Subject	Date
<a href="#">Final decision on Compliance Procedures and Guidelines</a>	July 2024
<a href="#">AER overseeing Centrepay refunds</a>	July 2024
<a href="#">Finalised review of the Retailer Reliability Obligation (RRO) Auditors Panel</a>	August 2024
<a href="#">Day Ahead Auction Record Keeping Guideline</a>	August 2024
<a href="#">Retailer Reliability Obligation Guidance</a>	August 2024
<a href="#">Guidance to retailers following Better Bills Guideline compliance activities</a>	October 2024
<a href="#">Final guidance note on export limits</a>	October 2024
<a href="#">Final decision – AER Compliance Procedures and Guidelines for gas pipeline service providers 2024</a>	December 2024
<a href="#">AER letter to retailers to outline expectations for compliance with Queensland Derogation</a>	December 2024
<a href="#">Update Semi-Scheduled Generator Compliance Bulletin following enablement of Max avail</a>	February 2025
<a href="#">AER letter to retailers – supporting customers impacted by ex-Tropical Cyclone Alfred</a>	March 2025
<a href="#">Family Violence Rules: Guidance for Energy Retailers</a>	April 2025
<a href="#">Wholesale gas reserves price assumption report 2025</a>	April 2025
<a href="#">Guidance to retailers: Notice to small customers on smart meter installation</a>	May 2025
<a href="#">Open letter to the energy sector and new strategy to support customers affected by family violence</a>	May 2025
<a href="#">AER decision under section 37 of Better Bills Guideline for retailers re-using plan names</a>	May 2025
<a href="#">AER letter to retailers outlining Red and Dodo enforcement outcomes and compliance expectations on hardship obligations</a>	May 2025
<a href="#">Draft interim Contract and Firmness Guidelines released for consultation</a>	June 2025

# Glossary

Term	Definition
ACO	Annual Compliance Order
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
AQL	Auction Quantity Limits
CER	Consumer energy resources
DAA	Day Ahead Auction
DNSP	Distribution network service provider
EWON	Energy and Water Ombudsman NSW
LMRP	Legacy Meter Replacement Plan
NCP	Net contract position
RRO	Retailer Reliability Obligation
SSG	Semi-scheduled generators
STT	Short-term transaction
STTM	Short Term Trading Market
TNSP	Transmission network service provider