

Frequently Asked Questions

MMIO-ELEC-2025-02

July 2026

© Commonwealth of Australia 2026

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
Tel: 1300 585 165

AER reference: MMIO-ELEC-2025-02 – FAQs July 2026

Amendment record

Version	Date	Pages
V1.0	29 July 2026	10

Contents

1.	Portal user registration	4
2.	Submission process	5
3.	Information collection scope	6
4.	Data, template and validation issues	6
5.	'No data' submissions	8
6.	Assurance requirements	9
7.	Other.....	9

Frequently Asked Questions - MMIO-ELEC-2025-02 ('the Order')

1. Portal user registration

1.1 How many people from my company can be registered as AER portal users?

For each company responding to the Order, currently we are requesting participants prioritise portal user registration to only two individuals. Companies can change nominated Portal Users at any time by following the steps in question 1.2 below.

Companies wishing to have non-portal users included in future email communication about this Order and other contract market making monitoring instruments can email a request to us.

1.2 What details should I provide to set someone up as an AER portal user?

For each representative to be provisioned access to the AER portal, please [email us](#) the following details:

- Your company's name
- Your company's ABN
- Your company's ACN, or an alternative unique identifier
- First name
- Surname
- Job title
- Email address
- Work phone number

1.3 Could one of the portal users in my company be set up using a generic/shared company email address (such as "compliance@XYZ_Energy_Company.com.au")

For security reasons, each AER portal user account must be assigned to an individual person, using that person's unique company email address.

1.4 If I represent several Class Members that are related entities, can I submit a consolidated response covering all those class members in one submission?

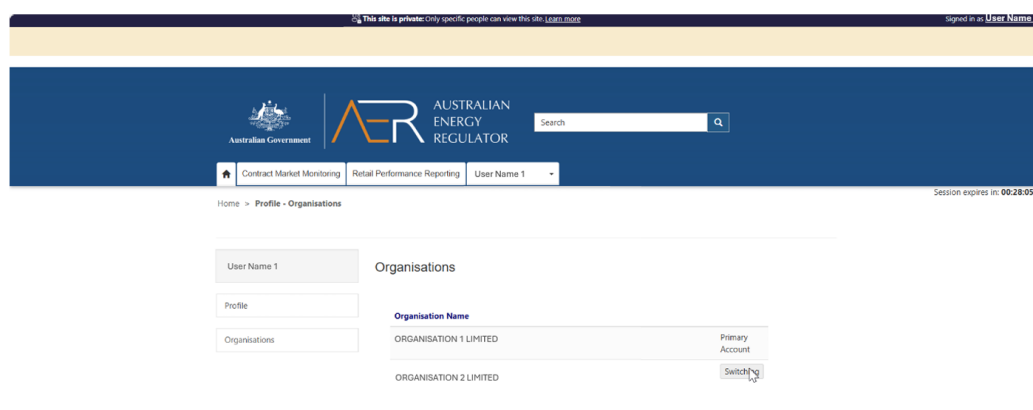
Yes, you can if you choose to do so. Section 3.7 of the Order provides that if multiple separate related entities in a corporate group are Class Members, one Class Member may submit a consolidated response on behalf of the other Class Members in that corporate group.

Please refer to Sections 3.8 and 3.9 of the Order for further details on how to submit a consolidated response, and to Section 7.2 regarding the assurance requirements that apply to those consolidated responses.

1.5 Can a single portal user switch between several organisations?

For each organisation you will be reporting for, please provide us with the user details listed in question 1.2, if you haven't already done so.

Where you are registered as a portal user for multiple organisations, you can switch between those organisations yourself by using the profile menu on the AER portal, as shown in the screenshot below.



Note that when an organisation is switched, the selected organisation becomes the active one and the user can only perform actions available under that selected organisation, until such time that they switch to another one they have been associated with.

If you still require help with switching organisations, please contact us on contractmarketmonitoring@ aer.gov.au

2. Submission process

2.1 I have been trying to upload data files to the portal but I'm encountering validation errors which I'm not sure how to resolve – can I just send the files via email or can I submit the files through the Supporting Documents area instead?

Under this Order, data files must be submitted through the AER portal. We cannot accept data files submitted by email. Portal submission supports secure handling, validation and processing of the data.

Data files should only be lodged against the corresponding data category. This allows the portal to validate, ingest and process the data correctly. If information is uploaded as a supporting document when it should have been submitted under a data category, we may require you to resubmit it.

If you need more time to resolve portal validation issues, please request a short extension using the process set out in the portal user guide, available [on our website](#). If you are unsure how to resolve the validation issue, contact us at contractmarketmonitoring@ aer.gov.au.

2.2 How do I request an extension?

Please follow the instructions for seeking extension laid out in the portal user guide, provided on our [website](#), or contact us at contractmarketmonitoring@aer.gov.au.

3. Information collection scope

3.1 Some of the trades my company conducted in the current reporting period are for volumes smaller than 1 MW – do we need to report these?

No – Data Categories Quarterly 01 and 02 only require contracts with a volume greater than or equal to 1 MW to be reported.

3.2 In the OTC Standard Contracts template I'm seeing six contract type options. What should I do with OTC contracts my company has traded which do not fit neatly into any of those 6 types?

Class Members are only required to report OTC contracts which fall under the categories laid out in the Order, namely 'Flat Swap', 'Cap', 'Morning Peak Swap', 'Evening Peak Swap', 'Average Rate Option' and 'Base Strip Option'. We understand you may be trading other types of OTC contracts, however at this time the Order does not cover any such additional types and so there is no need to report them to us.

4. Data, template and validation issues

4.1 The Order refers to quarters, such as Q1, Q2 etc. Are these calendar or financial year quarters?

The Order defines quarterly reporting periods in Table 2, under section 4.3. It refers to calendar year quarters – for example Q1 refers to the first quarter of the calendar year, being the period 1 January – 31 March.

The portal currently categorises quarterly periods by Financial Year Quarter. You can refer to the table below to match calendar year quarters to financial year quarters to assist with information submissions.

Calendar year quarter	Financial year quarter	Months
Q1	Q3	January – March
Q2	Q4	April – June
Q3	Q1	July – September
Q4	Q2	October – December

4.2 Which of the date fields in the template should correspond to the current reporting period?

The Trade Date field (being the date on which the Class Member entered into the contract) is the one that should correspond to the current reporting period. For example, if you're responding to a Q2 2026 calendar year contract market monitoring information request, that means your reported trade dates should all fall within the second quarter of the calendar year 2026 (1 April – 30 June 2026).

4.3 If an OTC contract's counterparty is an overseas entity and therefore doesn't have an ABN, what company identification should I provide for it?

Overseas entities without an ABN normally have a Legal Entity Identifier (LEI) which, unlike an ABN, may include both numbers and letter. To identify any overseas entities please provide the LEI in the 'ABN or Legal Entity Identifier of Counterparty' field of the OTC Standard Contracts template.

4.4 How should I report an OTC Standard Contract that covers only part of the day? For example, how do I know whether it should be reported as a morning peak or evening peak contract?

The Order does not prescribe exact start and end times for morning peak or evening peak OTC Standard Contracts. This is because OTC contracts may have different terms, while still having the essential characteristics of the equivalent exchange-traded product.

As a general guide, you should report an OTC contract if its delivery period covers all or part of the ASX-defined morning peak period (06:00 to 09:00 AEST Monday-Sunday) or evening peak period (16:00 to 21:00 AEST Monday-Sunday). A contract with a delivery period wholly outside those periods is unlikely to be a morning peak or evening peak OTC Standard Contract. For example, an OTC contract covering 10 am to 4 pm AEST would generally not be reported as a morning peak or evening peak contract.

4.5 What common portal validation issues should I check before submitting my files?

Before submitting, please check your files for the following common validation issues:

- **Incorrect date format** – all date fields in the data templates must use YYYY-MM-DD format, for example 2026-08-25.
- **Missing Trade IDs** – include a unique Trade ID for each reported trade.
- **Delivery End Date before Delivery Start Date** – the portal will not accept a delivery end date that is earlier than the delivery start date.
- **Wrong template error** – see question 4.7 for guidance on this error.

4.6 Can I change the data template?

No. Please do not make structural changes to the templates change such as adding, deleting or renaming columns. This will cause a portal validation error. Please use the template exactly as provided [on our website](#).

If you need to provide extra information or clarify your data, include it as supporting documentation.

4.7 Why am I getting a “wrong template” error when I am using the data template from the [AER webpage](#)?

The “wrong template” message is a general portal error. It may appear when the portal cannot identify a more specific validation issue.

If you receive this message, first check the common validation issues listed in question 4.5. Also check that you have not changed any template tab names, column names or other template structure. If the issue persists, contact us at contractmarketmonitoring@ aer.gov.au.

5. ‘No data’ submissions

5.1 What should I do if I don’t have information to submit under a certain data category for the relevant reporting period?

The portal enables you ‘skip file upload’ if you have no information to submit for particular data categories. To skip file upload, follow the steps outlined in the user guide, available [on our website](#).

5.2 I have no information to submit for a data category. Should I upload a blank template?

No. Please do not upload a blank template. If you have no information to report for a data category, use the ‘skip file upload’ option for that category. This tells the AER that you have no information to submit for the relevant reporting period.

5.3 I cannot see the ‘skip file upload’ option in the portal. What should I do?

On the ‘Files to be Uploaded’ screen, find the relevant data category. In the dropdown box at the far right of the table, select ‘**Upload File**’, not ‘**View Details**’. This will open the screen where you can choose ‘skip file upload’. The ‘**View Details**’ option does not include the skip file upload function.

Name	Required	Virus Scan	Data Validation	Errors	Skip file upload
Cover/pro Forma letter	Yes	✓	N/A		N/A
One-off 01 – Historical PPA information	Yes	✓	N/A		N/A

☒ View Details
☐ Upload File

5.4 I don't have information to submit for the relevant period and have used the skip file upload option to indicate that. Do I still need to submit a proforma/cover letter?

Yes – Section 8.4 of the Order requires Class Members to submit a proforma/cover letter even if the Class Member has no information to provide for the relevant reporting period.

5.5 If I skip all data categories for this collection, can I explain this in the signed proforma or cover letter?

Yes. While the Order does not require you to explain skipped file uploads, a short explanation in your signed proforma or cover letter can help us understand your submission and reduce the need for follow-up questions.

For example: “[Class Member] has no information to provide for Data Category Quarterly 01 because it did not enter into any exchange-traded contracts during the relevant reporting period.”

6. Assurance requirements

6.1 Can I use a cover letter instead of a proforma to meet the Order's assurance requirements?

Yes. You may use a cover letter to meet the assurance requirement, provided it includes the assurance statement required by section 7.3(b) of the Order. The Order does not prescribe a separate cover letter template.

You can also use one of the proforma templates in Appendices B, C and D to the Order. These templates are provided to help Class Members meet the assurance requirements in a consistent way.

6.2 Can I use the 'skip file upload' function for the proforma/cover letter?

A signed proforma/cover letter is a mandatory assurance requirement set out in Section 7.3 of the Order, and must accompany every submission.

7. Other

7.1 Can I replace or delete a file if I upload the wrong version or find an error?

Yes. There are two options, depending on where you are in the submission process:

- **Before submission:** you can upload, delete and replace files in the AER portal as needed.
- **After submission:** you need to lodge a resubmission request in the portal before changing submitted information. To request a resubmission, follow the instructions in the User Guide available [on our website](#) or email us at contractmarketmonitoring@ aer.gov.au.

7.2 I have requested an extension through the portal. When can I expect a response?

The AER will review and process extension requests as promptly as possible. If we receive a high volume of requests, our response may take longer than usual. If your request is urgent or you need an update, please contact us at

contractmarketmonitoring@ aer.gov.au.

7.3 How do I seek an exemption from the Order?

An application for exemption from providing the information required under the Order must be provided in writing using the exemption application form in Appendix E of the Order. This can be emailed to us at contractmarketmonitoring@ aer.gov.au.

See section 10 of the Order for more information on applying for an exemption.