

13 November 2025

Matthew Tsikrikas  
Project Lead  
Australian Energy Market Commission

Dear Mr Tsikrikas,

### **Integrated distribution system planning Directions Paper**

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) Directions Paper on Integrated distribution system planning (IDSP).<sup>1</sup>

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA agrees that effective distribution network planning by DNSPs is needed to realise the huge opportunity that the transformation in consumer energy resources (CER) adoption presents for Australia. ENA and Distribution Network Service Providers (DNSPs) have been engaging extensively with processes designed to better integrate electricity and distribution planning and to improve access to more granular distribution data.

ENA recognises the Distribution Annual Planning Report (DAPR) is not fit for purpose in its current form. Developing the DAPR is resource intensive for DNSPs to develop with the report attracting very low reading rates and limited engagement with stakeholders. ENA is supportive of removing duplicative sections that are reported elsewhere under existing regulatory obligations.

ENA supports the intent of the AEMC's Directions Paper to improve granular data access for customers. Data collection and provision has a cost however and any new data reporting requirements should be considered in the context of the additional benefit versus the additional cost of collecting and providing the information. Some consideration should also be given to the different data availability and resources between DNSPs. It is important to not be overly prescriptive in the current environment, taking these differences into account.

Further information is required to formally support one policy option in its entirety. ENA suggests that a gap analysis be undertaken to clearly inform the data that would be included in a strategic planning process, as compared to the data that would be included in the updated DAPR, to ensure a forward-looking focus. Additional clarity on the potential timing, particularly to manage resource constraints and avoid duplication with other work programs, is also imperative.

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<sup>1</sup> AEMC, [Integrated distribution system planning](#) Directions Paper, 16 October 2025.

## Support for more granular data

ENA is supportive of the AEMC's direction to provide more granular data to customers. The energy transition is expanding the availability of CER and data is playing a vital role in their development.

ENA recommends the AEMC carefully consider what additional data customers would benefit from. DNSPs are subject to extensive data reporting already and providing additional data comes at additional cost. Any proposed data inclusion should be considered in the context of the value it provides in addition to already published and readily available data. For example, voltage data should not be reported as a network average as it is highly locationally specific and to accurately provide this data would be incredibly costly.

Not all DNSPs are currently at the same level when it comes to collecting and publishing granular data across their network areas. ENA recommends introducing a minimum standard for data publication to account for the different stages of development across DNSPs. A minimum standard can improve granular data available to stakeholders, with an incentive for all DNSPs to provide data above such a standard where feasible and cost effective. This approach ensures an appropriate balance between resourcing, customers costs, and the benefits of greater data availability.

## Stakeholders use of the DAPR

ENA agrees the DAPR is currently not fit for purpose in its current form. The DAPR accumulates very low reading rates, disproportionate to the effort and resourcing required to complete the report. Much of the data and reporting in the DAPR are duplications of existing reporting requirements. This presents an opportunity to enhance efficiency by eliminating duplicative reporting requirements. The data underlying DAPR reports is often extremely useful and is the information typically sought after by stakeholders. The adjoining reporting on the other hand is less useful and requires DNSP resources to complete. It is important to retain the data included in the DAPR in some form, while potentially streamlining the reporting elements and removing any data that is no longer useful or already collected elsewhere.

DNSPs have moved towards online and customer friendly versions of the DAPR which have received positive feedback from stakeholders. DNSPs are also introducing online 'heatmaps' of network capacity as an interactive stakeholder resource. ENA recommends moving away from the requirement for DNSPs to complete the written DAPR report and instead focus on the provision of interactive online resources.

## Preferred policy options

In the directions paper the AEMC outlined three potential policy options:

1. New strategic planning report and reformed DAPR
2. Reform DAPR process to incorporate strategic planning
3. New strategic planning report replacing DAPR

ENA is not supportive of the proposed policy option 1. This option introduces additional requirements for DNSPs and lacks clarity regarding opportunities to streamline processes. It is likely that the same teams within DNSPs would be responsible for both the DAPR and the strategic planning process and policy option 1 would create further obligations thereby increasing

the difficulty of managing resources. Even with a streamlined DAPR, the reporting requirements would remain disproportionate to the benefits gained from implementing both the DAPR and a strategic planning process.

ENA's preferred options, contingent on further clarity, are option 3 and to a lesser extent 2; i.e. a transition to a strategic planning process completed every five years and the removal of the DAPR, or a reformed DAPR. The preference of option 3 over 2 is contingent on the interlinkages with the demand side factor inputs to the Integrated System Plan (ISP) <sup>2</sup> being progressed separately. If there is significant overlap, ENA would prefer policy option 2 in order to avoid any unnecessary duplication of effort.

ENA prefers option 3 as the strategic planning process is a development of the DAPR and has the potential of being more stakeholder friendly. The inclusion of planning horizons to match the ISP at the sub-transmission may have benefits for the ISP process and will have synergy with DNSPs providing demand side factor inputs. However, further consideration should be given to setting reporting requirements across a 20-year horizon at the low voltage (LV) level. DNSPs would have a high degree of uncertainty in providing forecasts for 20-year planning horizons at the LV level, especially when it comes to technology advancement and rates of adoption. The requirement for such forecasts should be considered with a significant degree of caution. Forecasts of this length should not include data that would not be possible to forecast with any accuracy on this timeframe, such as network constraints.

The preference for option 3 is also contingent on further information and detail on the difference between the DAPR in its current form and a new strategic planning process. This is not yet articulated in the directions paper. ENA recommends the provision of a gap analysis to highlight the differences between reporting in a proposed strategic planning process and the DAPR in its current form. A potential transition to a strategic planning process must be forward-looking in the way DNSPs report information. It is imperative to assess where reporting requirements in the DAPR may be duplicative to avoid the same duplication in the strategic planning process. A gap analysis will also help to identify data of high value to customers.

ENA considers the inclusion of scenario testing as reasonable and it may improve the information available for stakeholders. DNSPs are already starting to complete such scenario testing, and these current efforts would support inclusion in a strategic planning process. It will be beneficial to provide DNSPs with the flexibility to determine which scenarios best reflect their unique jurisdictional requirements and policy settings.

### Clarification on the policy options needed

ENA considers further information and clarity is required to fully support one policy option over the others at this stage. As discussed, more detail is required on what would be included in a strategic planning process as opposed to a streamlined DAPR. This is especially relevant for DNSPs with dual functions in gas or transmission networks.

Clarity on proposed timing is also imperative to understand the potential impacts. In particular, whether a strategic planning process would be updated in a DNSPs revised proposal. ENA considers it appropriate for a DNSP to have the strategic planning process only inform the initial

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<sup>2</sup> AEMO, [2025 Demand Side Factors Information Guidelines Consultation](#), 22 October 2025

proposal to reduce burden on numerous updates within a short period of time. The annual updates following the AER's final decision, would serve as the update to include changes in approved allowance.

ENA suggests DNSPs could use the strategic planning process as supporting evidence to inform a regulatory proposal. The AER should be obligated to consider the strategic plan in regulatory decisions where DNSPs have used the plan as supporting evidence. The AER should not be required to approve strategic plans as it adds another layer of regulatory approval, contributing to regulatory burden.

The AEMC should make clear under the proposed plan for all policy options how each option would influence DAPR reporting requirements in the near term. Under policy option 1 and 3, DNSPs are expected to continue to annually complete the DAPR until its respective reset applies. ENA considers it onerous and not beneficial to customers to continue to meet the requirement to complete the DAPR in its current form during a transitional period if the rule change progresses to other options. Removing DAPR requirements identified as duplicative or burdensome in a transitional period provides additional time and resources for DNSPs to redirect to uplifting data capabilities. It would also help to support a balanced set of obligations across all DNSPs.

The AEMC should carefully consider if there is any duplication of efforts with other rule changes or projects. The AEMC has recognised work underway in Data Sharing Arrangement M2 consultation<sup>3</sup>, demand-side factors into the ISP, and the real time access to data rule change<sup>4</sup> as potential overlap. ENA supports continued engagement and consideration of such work programs in assessing the most cost effective option to improve distribution system planning and data accessibility in the future.

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Senior Regulatory Analyst, on [vbaikie@energynetworks.com.au](mailto:vbaikie@energynetworks.com.au).

Yours sincerely,



**Russell Pendlebury**  
**General Manager, Regulation and Policy**

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<sup>3</sup> DCCEEW, [National CER Roadmap – Data Sharing Arrangements – M2](#), 20 August 2025

<sup>4</sup> AEMC, [Real-time data for consumers](#), 11 September 2025