



Progressive Green PTY LTD T/A Flow Power  
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# Integrated distribution system planning

## Flow Power submission

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## About Flow Power

Flow Power is an electricity retailer that works with energy customers throughout the National Electricity Market (NEM). Together with our customers, Flow Power is committed to our vision of creating Australia's renewable future.

We empower customers to take meaningful action. By providing energy knowledge and innovative technology, we are delivering smarter ways to connect customers to clean energy to make our renewable future a reality. We provide our customers with:

- + Engineering support, access to live data and transparent retail tariffs that reward demand flexibility and encourage electricity usage at times of plentiful renewable output.
- + Hardware solutions that equip customers with greater information, visibility and control over energy use.
- + Access to renewable energy, either through distributed solar and storage installed on site, or through a power purchase agreement with utility-scale wind and solar farms.

We believe that by equipping customers with these tools, we can lower costs for all energy users and support the transition to a renewable future.

## Overview

We are broadly supportive of the approach the AEMC has taken in the directions paper. In particular, we support the separate consideration of the network planning aspects of the rule change and the network visibility aspects. While these two aspects are interlinked, they serve different purposes and should be progressed on independent timeframes.

### Network planning

With respect to distribution network planning, we support a longer-term planning horizon, the development of more strategic planning reports, and closer interaction with the regulatory reset process. Separately, to support the development of markets for CER and retail products, it's also important for DNSPs to provide information about near term constraints and the current state of the network. To that end, we consider Option 1 strikes the best balance between providing visibility of long-term strategic planning decisions and more immediate operational considerations.

### Network visibility

While we strongly support the policy intent – that is, to provide stakeholders with greater transparency of low-voltage network data – we believe that its implementation could be improved to better support the NEO.



The AEMC's proposed principles require the AER to determine, among other things, the consumer benefit of DNSPs publishing particular data sets and the feasibility of collecting and publishing data. In our view, the AEMC should conduct this cost/benefit analysis as part of the rule change process. It is appropriate for the AEMC to make decisions about these trade-offs in the context of the objectives and cost/benefits of the rule change request, and its objectives, as a whole. Consequently, we propose that the balance between what sits in the rules and what in an AER guideline be shifted, so that the rules set out the minimum level of data and data types that DNSPs should be required to publish and with what frequency, and the guideline sets out process matters, such as how that data is to be published.

This approach ensures that the costs and benefits of the obligation are tested through a robust rule change process. It also provides stakeholders with long-term certainty about data visibility if these fundamental components are enshrined in the rules.

### Implementation

As noted by the AEMC, implementation of the proposed planning changes would need to be staged and may take several years to fully implement. By contrast, the network visibility changes can be implemented immediately. We encourage the AEMC to strive for the earliest possible implementation of the network visibility rule changes so that the benefits of this can flow as soon as possible.

If you have any queries about this submission, please contact me on (02) 9161 9068 or at [Declan.Kelly@flowpower.com.au](mailto:Declan.Kelly@flowpower.com.au).

Yours sincerely,

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