



13 November 2025

Anna Collyer
Chair
Australian Energy Market Commission

Lodged online: www.aemc.gov.au

Dear Ms Collyer,

Integrated Distribution System Planning Directions Paper

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback on the AEMC's Integrated Distribution System Planning (IDSP) Directions Paper. Origin supports the policy intent to strengthen the effectiveness, consistency, and transparency of distribution network planning across the NEM, recognising the increasing importance of distribution-level development and consumer energy resources (CER) in delivering a reliable, least-cost transition.

The current Distribution Annual Planning Report (DAPR) process has provided valuable transparency on near-term investment but could be improved to better manage the growing complexity of two-way energy flows, flexible demand, and electrification. A more strategic, forward-looking planning process aligned with the Integrated System Plan (ISP) would support greater coordination between distribution and transmission levels, provide earlier visibility of network limitations, and encourage efficient use of non-network and demand-side solutions.

Origin also strongly supports the proposed new distribution data reporting requirements, designed to improve transparency and accessibility of network information. Greater access to consistent and high-quality distribution data will enhance decision-making by market participants, support innovation and competition at the distribution and behind-the-meter level, and improve confidence in the transition pathway. These requirements should be flexible and adaptive to complement related reforms, such as the Data Sharing Arrangements – M2 under the National CER Roadmap¹ and AEMO's CER Data Exchange,² to ensure alignment and avoid duplication.

Question 1 – Purpose of the Proposed Strategic Planning Process

Origin agrees that it could be beneficial for the rules to outline the purpose of the proposed strategic planning process. The purpose articulated in the Directions Paper—requiring DNSPs to plan efficient investment in electricity network services that maximise the long-term interests of consumers under a credible range of scenarios—is appropriate. It provides clear alignment with the ISP, ensuring that distribution-level planning is guided by consistent principles and objectives across the system. While embedding this purpose in the rules could promote consistency and clarity across the NEM's broader planning framework, it may also be sufficient for this to be set out in supporting AER guidelines.

Question 2 – Planning Horizon

Origin recognises the potential benefits of a longer-term planning horizon of up to 20 years, particularly in supporting better coordination between distribution and transmission planning and providing visibility over emerging network needs in high-growth CER regions. However, a shorter planning horizon—such as 10 to 15 years—may be more practical and proportionate. Given the pace of change in the energy system, long-term forecasts are inherently uncertain and increasingly speculative the further they extend. Producing robust 20-year forecasts would require significant additional modelling effort that may

¹ National Consumer Energy Resources (CER) Roadmap – Data Sharing Arrangements – M2, DCCEEW, <https://consult.dcceew.gov.au/national-cer-roadmap-data-sharing-arrangements-m2>

² Consumer Energy Resources (CER) Data Exchange, AEMO, <https://www.aemo.com.au/initiatives/major-programs/nem-reform-program/nem-reform-program-initiatives/consumer-energy-resources-data-exchange>

not deliver commensurate benefits. The AEMC should consider the trade-offs between forecast reliability, resource requirements, and the value of insights provided when determining the final horizon.

Question 3 – Use of Scenario Analysis

Origin agrees that scenario analysis is an effective approach to managing uncertainty in long-term planning and supports the development of guidelines to ensure a consistent and transparent application across DNSPs. A common framework for scenario development, including guidance on inputs, sensitivities and documentation, would increase the comparability and usefulness of distribution planning outcomes. Origin supports the proposal for the AER to be responsible for developing these guidelines, leveraging its experience with the forecasting best practice guidelines.³

Question 4 – Alignment with the Inputs, Assumptions and Scenarios Report (IASR)

Origin supports requiring DNSPs to use AEMO's Inputs, Assumptions and Scenarios Report (IASR) as the baseline for their planning inputs and assumptions. This will promote consistency between transmission and distribution planning and strengthen coordination across system levels. However, DNSPs should retain flexibility to develop additional local scenarios or assumptions that reflect their unique network characteristics, provided these deviations are clearly explained and justified in their planning documentation. This approach balances the need for national consistency with the importance of reflecting local network realities and supporting transparency in the planning process.

Question 5 – Link to the Regulatory Proposal Process

Origin supports linking the proposed strategic planning process to the regulatory proposal process under Chapter 6 of the NER. This would improve efficiency and streamline consultation with industry and communities by aligning evidence, assumptions, and engagement processes. As consultation requirements continue to expand across multiple reforms, this linkage could help reduce duplication and consultation fatigue while maintaining robust stakeholder engagement. It would also ensure that the insights and priorities identified through strategic planning are directly reflected in DNSPs' expenditure proposals.

Question 6 – Purpose of the Distribution Annual Planning Process

If the AEMC proceeds with Option 1, or another approach that creates a new a strategic plan while retaining the annual DAPR, it will be essential to clearly articulate the distinct purposes of each process. The strategic plan should provide a long-term view of network development and scenario analysis, while the DAPR should continue to focus on short- to medium-term network performance, investment priorities, and emerging constraints. While it may not be necessary to define both purposes explicitly in the rules, the AER's proposed guidelines should clarify how the two documents interact and ensure that they collectively provide a comprehensive picture of network planning across different time horizons.

Question 7 – Streamlining the DAPR

Origin supports streamlining the DAPR where data and reporting functions are addressed through separate reporting requirements. Removing duplication will make the process more efficient, however, it is important that visibility of key inputs and outcomes is preserved. Where data remains integral to the DAPR's purpose or provides valuable insights into network conditions and investment needs, it should continue to be included. The AEMC and AER should ensure that any transition to separate reporting does not diminish stakeholder access to essential planning information.

Question 8 – Separate Reporting Requirement for Distribution Data

³ Forecasting Best Practice, AER, <https://www.aer.gov.au/industry/networks/system-planning/guidelines-system-planning/forecasting-best-practice>

Origin supports establishing separate reporting requirements for distribution data currently published in the DAPR. This approach would provide greater flexibility for the AER to evolve data requirements over time as DNSPs' capabilities improve, while also providing a mechanism to encourage continuous improvement in data quality and accessibility. Separate data reporting obligations, developed and overseen by the AER, would enable standardisation and transparency across the NEM and provide a clearer basis for stakeholders to identify opportunities for investment and innovation. The design of these obligations should remain proportionate and adaptive to ensure they deliver tangible system and consumer benefits without imposing unnecessary cost.

Question 16 – Consistency with Broader Work Programs

Origin agrees that the proposed policy options are broadly consistent with other major reform programs underway, including the Data Sharing Arrangements – M2 under the National CER Roadmap,⁴ AEMO's CER Data Exchange⁵, the *improving consideration of demand-side factors in the ISP* rule change,⁶ and recommendations from the NSW Transmission Planning Review.⁷ Continued alignment with these initiatives will be essential to avoid duplication, promote interoperability, and ensure reforms across the system are coherent and complementary.

Implementation and Proportionality

Origin supports a staged implementation approach that allows DNSPs to build data capability and planning maturity over time. Early improvements in distribution data reporting and DAPR transparency could deliver immediate benefits while preparing the industry for more comprehensive planning obligations. The AEMC should ensure that implementation timelines align with DNSPs' regulatory cycles and other reform processes to minimise duplication and costs.

In progressing the rule change, the AEMC should ensure that requirements remain proportionate, practical and efficient. Any new obligations should clearly complement existing processes and deliver measurable improvements in network transparency, planning coordination and consumer outcomes.

If you wish to discuss any aspect of this submission further, please contact Megan Findlay at Megan.Findlay@originenergy.com.au.

Yours sincerely,



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⁴ National Consumer Energy Resources (CER) Roadmap – Data Sharing Arrangements – M2, DCCEEW, <https://consult.dcceew.gov.au/national-cer-roadmap-data-sharing-arrangements-m2>

⁵ Consumer Energy Resources (CER) Data Exchange, AEMO, <https://www.aemo.com.au/initiatives/major-programs/nem-reform-program/nem-reform-program-initiatives/consumer-energy-resources-data-exchange>

⁶ Improving consideration of demand-side factors in the ISP, AEMC, <https://www.aemc.gov.au/rule-changes/improving-consideration-demand-side-factors-isp>

⁷ NSW Transmission Planning Review 2025, NSW Government, <https://www.energy.nsw.gov.au/nsw-plans-and-progress/regulation-and-policy/nsw-transmission-planning-review-2025>