

13 November 2025

Matthew Tsikrikas  
Senior Adviser  
Australian Energy Market Commission  
Level 15, 60 Castlereagh Street  
Sydney NSW 2000

Dear Mr Tsikrikas

**Re: National Electricity Amendment (Integrated Distribution System Planning) Rule 2026, Directions Paper**

TasNetworks welcomes the opportunity to provide comments on the Australian Energy Market Commission's (AEMC) *Directions Paper*<sup>1</sup> for the *Integrated Distribution System Planning* rule change (ERC0410). As both the Distribution Network Service Provider (DNSP) and Transmission Network Service Provider (TNSP) for Tasmania, TasNetworks supports a measured approach to enhancing distribution planning obligations that balances cost, efficiency and consumer benefit.

The *Directions Paper* presents three policy options, each imposing varying degrees of additional obligations on DNSPs. TasNetworks' submission sets out our preference for policy option two, which we consider achieves the best balance between additional costs to develop an integrated distribution system plan (IDSP) and the associated customer benefits. We also provide observations on specific issues within the policy options, including data reporting, planning horizons, scenario planning and implementation timing.

TasNetworks notes that Energy Networks Australia (ENA) has also prepared a submission on behalf of Australia's electricity distribution networks nationally. TasNetworks broadly supports ENA's comments but wishes to highlight our specific preference for policy option two based on Tasmanian circumstances.

### Tasmanian CER context

Tasmanian households and small businesses rely heavily on electricity as their primary energy source. However, uptake of consumer energy resources (CER) such as rooftop solar, batteries and electric vehicles (EVs) remains lower than other National Electricity Market (NEM) regions. In 2025, around 22.5 per cent of Tasmanian dwellings have rooftop PV generation, compared with more than 52 per cent in South Australia and Queensland.<sup>2</sup> Battery installation remains

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<sup>1</sup> AEMC, [National Electricity \(Amendment \(Integrated distribution system planning\) Rule 2026 Directions Paper](#), 16 October 2025

<sup>2</sup> [Australian Photovoltaic Institute - Mapping Australian Photovoltaic installations](#)

limited, with only 2,750 retail customers installing batteries to date, while EV adoption also lags behind mainland averages.

This slower pace of CER uptake informs TasNetworks' view that regulatory reforms should allow flexibility for regional differences, recognising Tasmania's distinct starting position and integrated network structure.

### TasNetworks' preference for policy option two

TasNetworks' considers policy option two to be the most appropriate of the three options presented. As the combined DNSP and TNSP for Tasmania, we already integrate distribution and transmission planning through our annual and revenue reset activities, achieving efficiencies of scale and coordination.

Policy option two best supports this integrated approach for the following reasons:

- It aligns with TasNetworks' existing combined planning framework and frequency of planning obligations,
- The ten-year minimum planning horizon achieves a suitable balance between transparency and certainty, and
- It minimises costs to consumers during a period of increasing cost-of-living pressures.

### Data reporting obligations

TasNetworks agree that the *Distribution Annual Planning Report (DAPR)* should focus on planning outcomes, with supporting data reported separately as supplementary information. TasNetworks already publishes much of the required data as supplementary attachments to its Annual Planning Report document.<sup>3</sup>

However, the proposed extent and frequency of additional publication obligations remain unclear. Without further detail, it is difficult to assess the full resourcing and cost implications. Increased obligations would likely raise DNSPs' ICT and administrative costs regardless of which option is implemented.

TasNetworks supports including high-level principles for distribution planning data obligations within the National Energy Rules (NER), with detailed data requirements to be defined in guidelines. This approach allows flexibility as DNSP capabilities, data availability, and market conditions evolve. It also enables stakeholder input into the development of those guidelines and helps balance transparency with cost.

Regional differences must also be considered when defining data obligations. Variations in DNSP systems, data visibility, and analytical capability mean that a uniform approach across

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<sup>3</sup> [TasNetworks. Annual Planning Report](#)

the NEM could impose disproportionate costs for limited benefit. For example, CER visibility and use cases vary significantly across jurisdictions.

TasNetworks emphasises that duplication with existing reporting should be minimised and that guideline development should carefully align with other regulatory and data provision frameworks.

### Five-yearly strategic planning obligation

TasNetworks supports the intent to strengthen strategic planning but notes that the costs, scope, and overlap of a new five-year strategic planning requirement with existing planning documents must be clarified. TasNetworks already prepares several strategic and asset management plans<sup>4</sup> that address long-term planning objectives, so any new obligations should complement, not duplicate, current processes.

### Planning horizon

TasNetworks does not support mandating a 20-year planning horizon. Forecasting at this timeframe, particularly at the low-voltage level, carries a high degree of uncertainty that reduces the reliability and usefulness of outputs for investment decision-making. In some cases, extending forecasts to 20 years may mislead proponents relying on uncertain data.

We consider that increasing the minimum planning horizon from five to ten years provides an appropriate balance between certainty and practicality. A ten-year horizon would allow sufficient visibility for long-term investment without imposing unnecessary analytical burden.

Where specific use cases require 20-year forecasts (e.g., for major load growth, embedded generation, grid-scale batteries, or EV charging), TasNetworks considers these should be developed through targeted connection or inquiry processes, funded by the relevant proponents rather than through broad DNSP planning obligations.

If a 20-year horizon is adopted, the rule change should clearly articulate the purpose and use case for such data, and any additional data requirements should be subject to separate consultation.

### Scenario planning

TasNetworks notes that DNSPs already undertake scenario planning to an extent, including forecasts of CER uptake. However, the *Directions Paper* does not define the expected scope of any new scenario planning obligations, making it difficult to assess costs or benefits.

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<sup>4</sup> [TasNetworks, Strategic Asset Management Plan - Public, 2022](#)

We consider it appropriate to base scenario planning on AEMO's Inputs, Assumptions, and Scenarios and Risks (IASR), provided DNSPs retain flexibility to deviate where justified by regional or operational differences. This will ensure planning remains realistic and proportionate to each jurisdiction's context.

### Implementation timing

If the AEMC proceeds with either policy option one or three, TasNetworks considers that implementation should be staged to allow a smooth transition. A seven-year implementation period would be reasonable for complex reform, while a two- to three-year transition to policy option two would align with TasNetworks' current planning cycles. The timing of implementation should reflect the scale of ICT and process changes required, recognising that DNSPs across the NEM have varying system capabilities and data maturity levels.

### Conclusion

TasNetworks reiterates its preference for policy option two, which retains the DAPR framework while extending the planning horizon to ten years. This option strengthens transparency and strategic focus without imposing the excessive costs and uncertainty associated with a 20-year requirement.

TasNetworks cautions against reforms that impose additional obligations or costs on DNSPs where the benefits are uncertain or accrue to only a subset of customers. Any new framework should allow for jurisdictional flexibility and ensure that costs are appropriately recovered from those who benefit.

We thank the AEMC for the opportunity to comment on the Directions Paper and would welcome further engagement as the rule change progresses. To discuss the views expressed in this submission please contact Alex Burk, Leader Regulation, at

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Yours faithfully

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Marthinus Le Roux  
Head of Regulation