3 June 2026

Australian Energy Market Commission

Submitted through AEMC website

Enhancing distribution network planning & reporting – Draft Determination

Alinta Energy welcomes the opportunity to respond to the draft determination on the Enhancing Distribution Network Planning and Reporting rule change (ERC0410).

Alinta Energy is an active investor in energy markets across Australia with an owned and contracted generation portfolio of over 3,300MW and more than one million electricity and gas customers. Our project development pipeline includes several projects that will likely connect to distribution networks rather than the transmission network. The quality, transparency and accessibility of distribution network planning and data are critical for planning purposes.

Support for the draft rule

Alinta Energy supports the draft rule as a positive step towards addressing a long-standing gap in the transparency of distribution networks. The replacement of the Distribution Annual Planning Report with a new Distribution Network Development Plan (DNDP), published every five years and aligned with the regulatory proposal cycle, is a sensible reform. The introduction of a 20-year planning horizon and scenario-based analysis using the Australian Energy Market Operator's (AEMO) Inputs, Assumptions and Scenarios Report will improve the consistency and rigour of distribution planning across the National Electricity Market (NEM).

We also support the introduction of a separate distribution network data reporting framework under rule 5.13A. Better visibility of distribution networks will help generators, consumers and other market participants make more informed investment and connection decisions.

While we support the draft rule in its current form, we consider this rule change presents an opportunity to go further and deliver a more comprehensive framework. In particular, the AEMC should consider three additional measures:

1. the data reporting framework should include metrics analogous to Enhanced Location Information,
2. DNSPs should publish granular, time-series distribution network data, and
3. the planning framework should support identification of distribution-level opportunities.

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1. **The data reporting framework should include metrics analogous to Enhanced Location Information**

The draft rule establishes a principles-based framework under which the Australian Energy Regulator (AER) will develop distribution network data reporting guidelines. We recommend that the AER require distribution network service providers (DNSPs) to publish credible, standardised metrics modelled on the Enhanced Location Information (ELI) framework used for transmission networks. ELI gives transmission network users locational signals that inform investment decisions. A comparable set of metrics for distribution networks would provide prospective generators and large consumers connecting at the distribution level with a similar level of transparency.

Alinta Energy supports clause 5.13A.1(b) of the draft rule, which states that the framework should improve visibility of available capacity, local network constraints and utilisation. The AER guidelines should give effect to it by requiring DNSPs to publish distribution-level indicators that signal where investment is encouraged or constrained, in much the same way that ELI informs investment on transmission networks. This approach would directly advance the framework's stated purpose of maximising benefits for current and prospective network users.

2. **DNSPs should publish granular, time-series distribution network data**

Alinta Energy considers that the draft determination appropriately recognises the need for greater visibility of the low-voltage network and the opportunity for smart meters to support more granular data reporting. The AER guidelines should therefore go beyond requiring static historical information, such as maximum and minimum substation loadings, and require DNSPs to publish half-hourly loading data for distribution lines at zone substations and on sub-transmission lines.

Half-hourly loading data provides developers an insight into diurnal power flows and load profiles across a distribution network area. This information is essential for feasibility-stage assessments as it allows developers to evaluate how proposed generation profiles for different technologies align with local demand patterns. In turn, this supports better-informed connection applications and investment decisions before a formal connection request is lodged.

DNSPs already collect this information through existing smart meters and network monitoring systems. As shown in Figure 1, TransGrid already publishes comparable data for its transmission network.

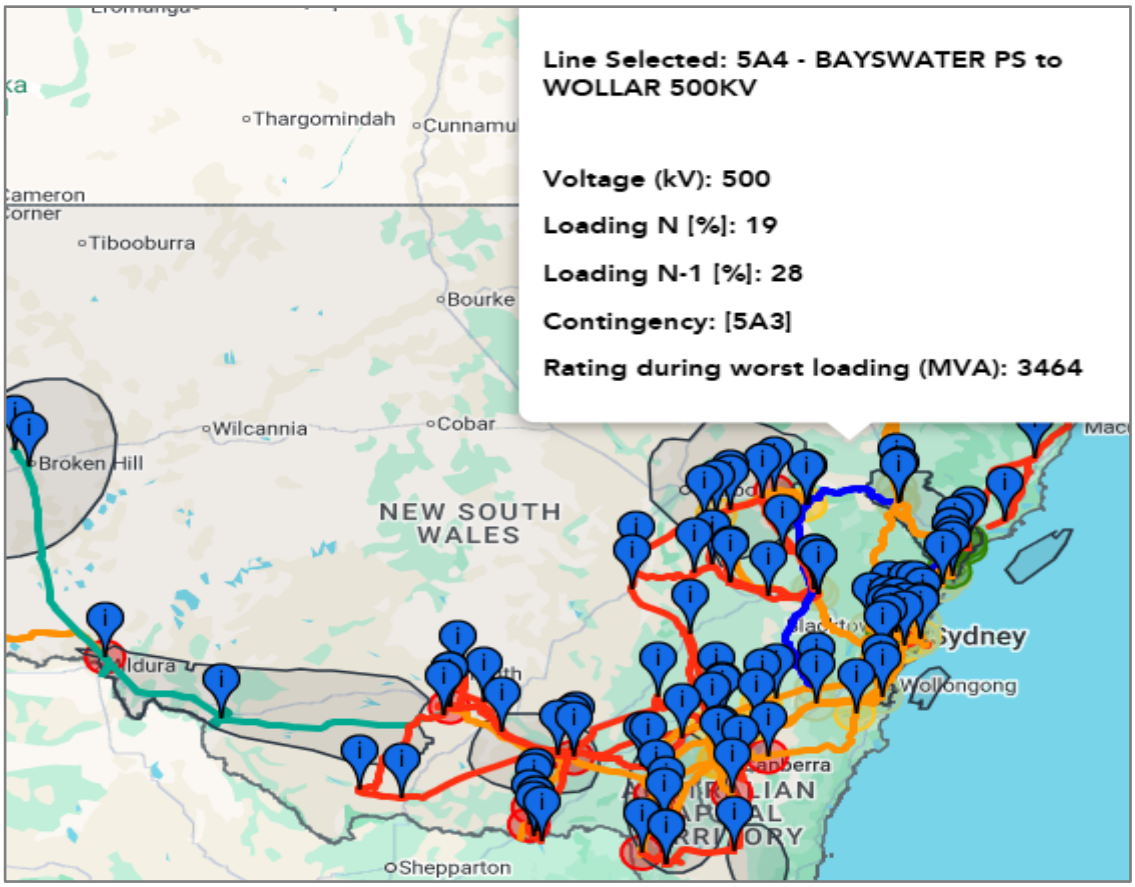

Figure 1: TransGrid Transmission Network – Line Loading and Contingency Analysis (Bayswater PS to Wollar 500 kV). Found here - https://tapr.transgrid.com.au/

TransGrid also publishes Historical Load Trace Data for each network line at 30 minute intervals in an accessible Microsoft Excel format. This provides a further useful source of information for network users and prospective proponents.

Requiring DNSPs to publish equivalent data in an interactive, regularly updated format would therefore be a practical and proportionate step within the proposed framework. It would also align with the draft rule's expectation that DNSPs publish information on the historical state and utilisation of distribution networks.

3. The planning framework should support identification of distribution-level opportunities

Alinta Energy notes that the draft rule aims to strengthen long-term planning at the distribution level, including through the DNDP's 20-year planning horizon and scenario analysis. Although Renewable Energy Zones are currently identified and declared at the transmission level, the growing penetration of consumer energy resources and distributed generation supports consideration of analogous opportunities within distribution networks.

The DNDP framework and the data reporting guidelines could help identify areas of the distribution network with persistent energy surpluses or deficits. Making this information transparent would encourage the co-location of new load, such as data centres and industrial

facilities, in energy-surplus areas and new generation in energy-deficit areas. This would reduce network constraints, improve distribution loss factors and promote more efficient use of existing distribution infrastructure.

Alinta Energy encourages the AEMC to consider how the DNDP and data reporting frameworks can lay the groundwork for this type of locational analysis, even if the formal declaration of distribution-level zones remains outside the scope of this rule change.

Implementation considerations

Alinta Energy supports the proposed implementation timetable, including the requirement for the AER to publish guidelines by 1 March 2028 and for DNSPs to comply within six months. We encourage the AER to prioritise granular loading data and locational investment signals in the first iteration of the guidelines, given the immediate value this information would provide to developers and other network users.

We note that the draft rule appropriately allows the AER to require different levels of data reporting from DNSPs during the transition period to reflect differences in data capability. This is a pragmatic approach. However, the AER should make clear that, after the transition period, all DNSPs will be expected to publish a consistent baseline set of data within a reasonable timeframe.

Conclusion

Alinta Energy supports the draft rule as a necessary reform that will improve distribution network planning and data transparency. We encourage the AEMC and the AER to ensure the guidelines deliver granular, actionable data that enables generators, large consumers and other distribution network users to make informed investment decisions.

Thank you for considering our submission. If you would like to discuss this further, please contact Karan Sharma, Manager Public Policy, at karan.sharma@alintaenergy.com.au.

Yours sincerely

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