

4 June 2026

Anna Collyer
Chair
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

Dear Ms Collyer,

Enhanced Distribution Network Planning and Reporting – Draft Determination (ERC-0410)

The Australian Energy Market Operator (AEMO) welcomes the opportunity to comment on the draft rule to enhance distribution network planning and reporting.

AEMO recognises the critical role that distribution networks will play in achieving a least-cost transition of the energy sector, particularly in delivering effective and timely integration of consumer energy resources (CER) and distributed energy resources (DER). AEMO also acknowledges that this rule change is being considered as part of a set of related reforms underway, including:

- the AEMC's Review of the Integrated System Plan (ISP)
- the implementation of reforms under the National CER roadmap, and
- the continued implementation of the rule change to *Improve consideration of demand side factors in the ISP*.

AEMO would like to make the following points regarding the proposed draft rule.

1. AEMO supports the introduction of the distribution network development plan (DNDP), as described in the draft determination, as a replacement for the current distribution annual planning report.

AEMO supports the introduction of a longer-term, consistent, transparent approach to the planning of distribution networks in order to drive efficient and appropriate investment in the distribution network, CER, DER and non-network solutions.

AEMO considers that the proposed 20-year planning horizon and requirement for scenario analysis are appropriate and should enable stronger alignment between distribution network planning and AEMO's Integrated System Plan (ISP). Increased consistency in planning methodologies and assumptions across distribution networks, along with improved transparency of network plans, will better inform a whole-of-system view of energy network planning.

The planning approach, to be detailed in the new AER Planning Guidelines, should:

- Require transparency and consistency in how DNSPs undertake scenario analysis and forecasting on which their DNDP is based, and

aemo.com.au

New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

- Explicitly encourage DNSPs to collaborate with AEMO and TNSPs to identify shared issues and opportunities, including those related to hosting capacity, system strength, and procurement.

2. AEMO supports the proposed requirement for DNSPs to adopt AEMO’s IASR as baseline inputs for the DNDP and also provide flexibility for DNSPs to use alternative inputs where they better reflect local conditions.

AEMO supports the use of consistent inputs, assumptions and methodologies across distribution network plans. This is important to facilitate effective comparison and aggregation of the content and outcomes of the plans to inform a wider, whole-of-system view of network investment and opportunities. AEMO also acknowledges that some flexibility will be required to account for local inputs and assumptions, particularly where they supplement the IASR by providing greater granularity and/or additional assumptions that are material to distribution network planning but not material to transmission network planning.

3. AEMO supports the proposed requirement for DNSPs to publish network data in accordance with a new set of guidelines developed by the AER.

AEMO supports the AEMC’s proposal to establish separate reporting requirements for distribution network data as the effective and efficient sharing of data is foundational to CER integration.

AEMO agrees with the proposed approach to introduce a ‘purpose’ and a set of ‘principles’ into the NER as a basis for the AER to develop the associated Data Reporting Guidelines. AEMO’s view is that the proposed Data Reporting Guidelines should be designed with DNSPs and other key stakeholders, and should support national consistency, interoperability, accessibility and efficient data sharing across the energy system. The Data Reporting Guidelines will need to be sufficiently detailed to ensure consistency across distribution networks in terms of technical definitions, methodologies, inputs, assumptions and data reporting standards. Data Reporting Guidelines that are too general in nature may result in data that is nationally inconsistent and not useful at a system-wide level.

The draft determination proposes that the purpose of the new data reporting framework is “to improve visibility on the state of distribution networks, in a way that maximises the benefits to current and prospective network users...” (page 22 of the draft determination). AEMO proposes that the purpose of the data reporting framework should emphasise that this is done in a way that is standardised, accessible and interoperable.

The draft determination also proposes three principles (page 24 of the draft determination) which the AER would be required to consider in the development of the Data Reporting Guidelines. The AEMC should consider whether an additional principle is warranted to ensure that the Guidelines are developed to achieve the data qualities of consistency, accessibility and interoperability.

AEMO is involved in the implementation of Recommendation 1 of the *M.2 Data Sharing Arrangements Final Report*, a key workstream of the National CER Roadmap. That recommendation, endorsed by the Energy and Climate Ministerial Council in December 2025, will see the establishment of a National CER Data Management

aemo.com.au

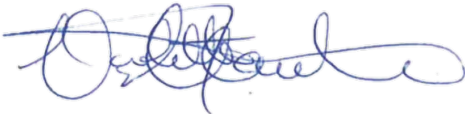
New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

Framework and a CER Data Coordination Function. The detail of this work should be reflected in the AER's Data Reporting Guidelines as they are developed, and the Data Management Framework is progressed.

AEMO considers it important that the AER's Data Reporting Guidelines also consider other data reporting requirements on DNSPs, such as those established under the *Improving consideration of demand side factors in the ISP* rule change or any identified during the establishment of Distribution System Operators, to minimise duplication or inefficiencies.

If you would like to discuss this matter further, please contact Hannah Heath, Group Manager – Strategic Market Reform (hannah.heath@aemo.com.au).

Yours sincerely,



Violette Mouchaileh

Executive General Manager – Policy and Corporate Affairs