ENERGY CONSUMERS AUSTRALIA

Enhancing Distribution Network Planning and Reporting Draft Determination

Energy Consumers Australia's submission to the Australian Energy Market Commission

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Summary

Energy Consumers Australia (ECA) is pleased to have the opportunity to respond to the Enhancing Distribution Network Planning and Reporting (EDNPR)[1] Draft Determination and associated NER amendments released by the Australian Energy Market Commission (AEMC) on 23 April 2026.

We commend the AEMC for the approach taken in the Draft Determination and are pleased to see the refinements made to our proposed rule change.[2]

As the national voice for household and small business energy consumers, we advocate for a fair, affordable, and reliable energy system—one that meets everyone's needs and leaves no one behind on the journey to net zero.

This rule change represents a milestone in the transformation of our energy grid, with the potential for significant benefits to be unlocked for consumers. It means ensuring that electricity distribution network visibility and efficiency significantly increase, ultimately improving consumer service, reducing the need for costly network upgrades, and turning consumer investments into shared savings for everyone.

It is worth reminding ourselves, that while this is an esoteric area of work for the average Australian, the impact on their daily lives could be profound. In lay terms, 'using what we've got better' will not only help keep household bills down but also lay the foundations for consumer access to the type of services and markets that will make up Australia's future energy eco-system. This looks like generation, storage, anciliary services and the ability to manage demand spread across traditional and non traditional actors in a digitised environment, where consumers are properly rewarded for the role they play in the system.

Meeting ambitions

Our original rule change request highlighted that *"the existing Distribution Annual Planning Reports (DAPRs) are not required to include an analysis of CER hosting capacity, and the analysis undertaken every five years through the existing expenditure proposal process is insufficient to ensure Distribution Network Service Providers (DNSPs) can account for large shifts of CER uptake".*[3]

The request went on to emphasise that there is also an *'asymmetry of information between distribution networks and third-party participants, which results in less optimal consumer outcomes".*[4] And additionally, that *"the rapid and expected increase in electrification, including the adoption of electric vehicles and phase out of gas, requires more frequent, comprehensive, and granular planning".*[5]

In lieu of improvements in the system, as noted in ECA's report, *'Realising a consumer powered future'* (2025), *"if the framework does not evolve, consumers risk paying for two systems: their own CER and*

[1] Formely known as the Integrated Distribution System Planning rule change.
[2] ECA, 2025 Integrated Distribution System Planning (Electricity) Rule Change Request
[3] *Ibid,* p. 1
[4] *Ibid.*
[5] *Ibid.*

additional infrastructure that their CER could have displaced, resulting in higher and more volatile network charges".[6]

In this light we believe the AEMC has arrived at a sound framework that will be foundational in efforts to maximise how we use resources within the distribution network. The 20-year planning horizon, scenario analysis, use of IASR inputs, interconnection with revenue determination, in concert with other elements of the proposed rule, represent key advancements which will ultimately benefit consumers through better integrated resources and right-sized investment that avoid unnecessary infrastructure build.[7]

This submission makes the case for further refinements, particularly related to guidance provided to the AER, to set the the Regulator up to progress the guidelines with clarity and precision.

Feedback on the AEMC's EDNPR Draft Determination

Our set of recommendations focus on questions 4 and 5.

ECA remains of the view that there is utility in a more prescriptive approach to identifying necessary data sets, as other jurisdictions have done, within the rule change itself. Consistent with our submission on the Directions Paper,[8] we request that the AEMC clarify that the priority datasets identified in the AER's Phase 3 Final Report of the Low-voltage Network Visibility project are de facto considered in scope for the AER guidelines. While we recognise that there will need to be a formal consultation process around the Guidelines, it is important to assist the AER to avoid wherever possible, relitigating issues they have already investigated and where a certain level of clarity has been achieved.

With respect to additional guidance for the AER, we emphasise five areas for consideration. These include:

- The importance of a consistent standardised methodology across networks and jurisdictions,
- Identification of a common platform for housing and accessing data, noting scope for leveraging existing systems,
- Articulating the importance of data collection, cleaning, and sharing within the context of cost allowance processes,
- Ensuring adequate access by the public, their agents and watchdogs as a key purpose; and
- Leveraging annual planning to monitor implementation, while putting in place a 2030 implementation stocktake to drive accountability.

Questions 1: Does the draft rule provide appropriate guidance on the application of the 20-year planning horizon?

We broadly agree that guidance around the application is sufficient.

We do recommend that the interconnection and interoperability of this process with ISP planning and revenue determinations remains clearly articulated. As noted in previous submissions,[9] the rule changes

[6] SPR, 2025 – Realising a Consumer-Powered Future, p. 62
[7] *Ibid.*
[8] ECA, 2025 – IDSP Directions Paper, p. 8
[9] *Ibid,* pp. 5-6

stand to benefit a number of allied processes such as the ISP with bottom-up forecasting by DNSPs offering more accurate CER projections at the local level. It is important that the final rule considers and documents the ways in which Enhanced Distribution Network Planning can improve other planning processes, in addition to how these new planning processes can benefit from existing ones.

Question 2: Is the purpose of the DNDP sufficiently clear?

ECA supports the framework as it is proposed.

Interconnection of short and long-term planning remains a key feature – balancing forward-thinking with a more granular outlook to account for rapid changes while also considering the broader perspective.

Per our response to the Directions paper,[10] data and planning can be drawn on during revenue proposals and will ensure that consumers and distribution networks unlock greater value from existing infrastructure and data.

The AEMC has taken steps to emphasise that this rule change is about increased transparency. It is important that this language and ambition is articulated in the final determination with respect to purpose. A clear signal that consumers and their agents can, and should, be able to access data produced under this rule change as a pathway to both increased accountability around network costs, as well as opening up access to new market services will be important. For example, it may help empower local actors such as local council's participation in future DNSP public EV charging planning. But integration between the processes such as this and data collection and planning processes under this current rule change will need to be deliberate.

Question 3: Have all the implementation considerations for the annual update been identified?

We recommend that the draft rule require annual updates on changes to planned projects for the next 5 years. This will help keep plans contemporary with the rapid pace of change and identify issues for operational decisions in a more timely fashion. This would also act as an accountability mechanism, being a vehicle to identify interim progress on rule change implementation as well as ensuring that other processes that tap into the information provided in the plans, such as the ISP, are accessing the most up to date information.

Question 4: Does the purpose provide appropriate guidance on the scope of the framework?

With respect to guidance on the scope of data required in the guidelines, ECA remains of the view that, as articulated in the UTS *Distribution System Data Harmonisation* report: "*the IDSP process [should] focus on both operational data from the AER's Low-Voltage Visibility work and forward-looking data to support long-term planning, strategic forecasting, and regulatory transparency. Particular emphasis should be placed on ensuring disaggregated data accessibility beyond regulatory and market bodies, enabling CER and load flexibility market service providers to address network needs and assess connection capacity*".[11]

[10] ECA, 2025 – IDSP Directions Paper, p. 6
[11] UTS, 2025 – Distribution System Data Harmonisation, p. 18

Consistent with our submission on the Directions Paper,[12] we suggest that the AEMC clarify that the priority datasets identified in the AER's Phase 3 Final Report of the Low-voltage Network Visibility project are de facto considered in scope for the AER guidelines (see below). In the alternative, it could be reflected in the determination as a piece of work that signals the character and flavour of what is expected under the guidelines. This will give both the AER and stakeholders a headstart in framing and responding to consultations TOR and questions.

As we emphasise in our response to Question 5, standardised approaches to data collection, formatting and governance become especially valuable, as transaction costs are reduced for all third parties. Even if it's a slightly higher cost to the DNSP, it's a lower total system cost as third parties can access data and insights and value at lower cost.

Data Item	Data Category	Details
Current & forecast remaining delivery capability	Import Capability	kW or kVA by season for HV feeder and distribution substation (DS)
Network augmentation plans	Import Capability	kW or kVA by feeder and distribution substation
Indicative annual deferral value	Import Capability	$ per kW or kVA by HV feeder and distribution substation
Current & forecast remaining export capability	Export Capability	Static export limits by season and time of day
Network augmentation plans	Export Capability	kW or kVA by feeder and distribution substation
Indicative annual deferral value	Export Capability	$ per kW or kVA by HV feeder and distribution substation
Curtailment data	Curtailment	kW reduction by duration, location, season, time of day, and reason (e.g. voltage condition)
Voltage levels	Network Connection	Historic average voltage by distribution substation and HV feeder
Reliability metrics	Network Connection	SAIFI and SAIDI by distribution substation and HV feeder

Question 5: Does the draft rule provide appropriate guidance for the AER when preparing the guidelines?

There are a number of considerations that are important to reflect in any guidance given to the AER in promulgating the guidelines.

Firstly, methodology, formatting and governance arrangements should be standardised across DNSPs. To a certain extent the overall enterprise envisaged by the rule change stands or falls on appropriate systems harmonisation, and as such we request that it is included as part of the principles.

The CSIRO's National Low Voltage Taxonomy Study, a project undertaken in partnership with a majority of Australia's distribution networks in 2018-21, tried to create tools to enable the network businesses themselves to better understand what was happening in their low-voltage network. That project ran into a number of real-life data issues that the rule change holds the promise of helping to solve, which will enable

[12] ECA, 2025 – IDSP Directions Paper, p.8

the broader objectives of the rule to be met. For these objectives to be met most cost-effectively, however, organizations like the CSIRO and third-party firms need to be able to effectively ingest data from networks to test the assumptions or decisions the networks are making – to act as a watchdog – and to decipher how best to leverage consumer assets to reduce or avoid network issues – to reduce overall network costs. As the study notes, "the lack of standardised data formats and availability of software tools to clean and parse network data file formats creates a significant barrier to innovation, and indeed to improving network utilisation."[13]

CSIRO's study identifies several concrete issues with data collection by DNSPs. It states,

> *"DNSP businesses lack reliable impedance and phase connectivity data that would allow the models [of low voltage networks] to accurately represent reallife conditions….The largest challenge that the project faced was comparing common features across different datasets that were not described and maintained in standard ways across DNSPs. Varying levels of network data completeness, missing distributed generators, loads and service lines, missing grounding data, missing feeder information, undocumented GIS coordinate systems, and inconsistent or missing switch labelling, impedance representations and transformer configurations were among the most problematic and prevalent features of the majority of network models provided. For all but two DNSPs, the provided network data were incomplete and biased samples of the actual low-voltage network assets owned by the DNSPs".*[14]

The study identifies a clear opportunity to solve some of these challenges: "*[the development of] novel librairies of cable and overhead lines based on first principles. Aligning industry on a common library of cables and overhead lines could significantly simplify data harmonisation, processing, and analysis, and prove invaluable in developing impedance data and building harmonic power flow models*."[15]

Uniform methodology and delivery of data is important for third parties, like CER aggregators, who would want to use the data to build tools that work off identical or very similar data formats/governance approaches. It reduces the cost of entry for service providers and minimises costs passed on to consumers. Alongside cost of entry, as the CSIRO's National Low Voltage Taxonomy Study notes, "*developing next-level network data sets is considered one of the first milestones to enable advanced distribution management applications*' and in this sense plays and key market enabling role".[16]

Standardisation also reduces the costs to both regulators and watchdog organisations in terms of enabling benchmarking. As noted in our original rule change request, *"benchmarking is an effective tool to positively influence corporate behaviour by comparing the outputs from peer groups of companies".*[17] In particular, *"the data required for better distribution planning can also be leveraged to enable additional and valuable benchmark comparisons, the most important of which is network utilisation".*[18]

[13] CSIRO, National Low-Voltage Feeder Taxonomy Study, p x.
[14] *Ibid.*
[15] *Ibid*, p. xi
[16] *Ibid,* p. 90
[17] ECA, 2025 – IDSP Rule change request, p. 6
[18] *Ibid.*

In pursuing a unified methodology, it is important to take into account and build upon the work of some DNSPs who are already actively seeking to capture such data.

In the attachment to ECA's response to the Directions Paper, UTS researchers highlight the potential to adapt AEMO's Demand Side Factors initiative.[19] Such a consideration may be bundled with any principle related to standardisation.

Thidly, the rule needs to make clear to the AER that the DNSPs have an obligation to do the planning and data reporting fully, but cost effectively. Cost-effectiveness should be considered over a long-term horizon and with respect to the full spectrum of users, including avoiding transaction and administrative costs on non-DNSPs.

To this end, we reaffirm our recommendation provided in our submission to the Directions Paper suggesting adopting the following principle: "*that a certain level of network data visibility is essential to support the energy transition, even if it cannot be justified through a traditional cost-benefit analysis*".[20]

Fourthly, we welcome the reduction of the timeframe for implementation from seven years for four years. At the same time, we continue to stress the urgency of implementation if we want to realise the full benefits of this rule change, including services market development and network utilization optimization.

It should be noted that much data is already available through smart meters and some DNSPs are already well progressed in the collection of data and should be encouraged to continue to reinforce their systems as part of the regulatory review process.

To maintain momentum for the broader suite of DNSPs, we encourage the annual planning and review process to be used as a vehicle to track implementation progress. We recommend that the determination recommend a stocktake of implementation be conducted in 2030 to assess progress and whether the rule change is beginning to deliver on its intended purpose.

[19] UTS, 2025 – Distribution System Data Harmonisation, p. 18
[20] ECA, 2025 – IDSP Directions paper, p. 8

Conclusion

ECA thanks the AEMC for the opportunity to provide feedback on the ENDPR Draft Determination, and commends the AEMC for the approach taken throughout the consultation process.

This rule change should represent a waypoint in the more efficient and effective utilisation of the distribution network. It represents an opportunity to right-size the network and deliver the planning and data necessary to unlock new services for both consumers and the broader network.

We look forward to collaboration with the AER as it is passed the torch by the AEMC for realising this ambition.

In supporting the AER to take on this role, amongst our various recommendations, those related to the scope of data, aim to give the AER a headstart in the urgent task of development of its guidelines. Importantly the rule change can provide the coverage the AER needs to ensure that the planning and data collection process becomes consistently embedded in OPEX cost allowances.

Fundamentally, this process should be regarded as part of a broader initiative to realign network incentives towards leveraging what we have more efficiently, while capitalising on the wealth of non-network options that CER, new market service providers and expanding digitisation have to offer.

For any queries about our submission, please contact Julian Egan at julian.egan@energyconsumersaustralia.com.au.

Yours sincerely,

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