

04/06/2026

Matthew Tsikrikas
Project Lead
Australian Energy Market Commission

Dear Mr Tsikrikas,

Enhancing distribution network planning & reporting Draft Determination

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) Enhancing distribution network planning & reporting Draft Determination.¹

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA supports the policy intent of the AEMC's draft determination for a more preferable draft rule to replace the Distribution Annual Planning Report (DAPR) with a Distribution Network Development Plan (DNDP). However, ENA considers without refinement to the draft rule, there is a risk the DNDP will lose its strategic purpose, instead becoming a resource-heavy compliance document similar to the DAPR it replaces.

To ensure DNDPs meaningfully informs decisions, ENA strongly recommends that the National Electricity Rules (NER) require the Australian Energy Regulator (AER) to have regard to the DNDP in its decisions on revenue resets and to provide clear reasoning where it has materially departed from a networks long-term strategic planning. Extending network planning to a 20-year forecast will provide important context to each Distribution Network Service Providers (DNSP's) five-year regulatory revenue proposal. This value will only be realised if the DNDP has a clear and practical role in regulatory decision-making, including by requiring the AER to have regard to the DNDP when assessing revenue proposals.

The draft rule responds to rapid growth in consumer energy resources (CER) and the need for greater visibility of low-voltage (LV) networks, particularly to support efficient integration of rooftop solar, electric vehicles and batteries. ENA agrees that modernised distribution planning and data reporting are essential to unlocking the value of CER while minimising total system costs and sees the DNDP as a key vehicle for delivering this outcome. A fully considered final rule, which provides sufficient weight to the DNDP in regulatory decisions, would strengthen alignment of five-year regulatory proposals with the long-term direction of networks and improves availability of planning information for stakeholders and consistency with the Integrated System Plan (ISP), the National CER Roadmap and related reforms.

It is important to weigh the benefits of any additional data publishing requirements against the cost of providing that data. Customers are the ultimate bearer of increasing costs related to data collection and refinement. Therefore, it is crucial to consider the benefit of additional data, including through avoiding repetition of existing and future reporting requirements.

¹ AEMC, Enhancing distribution network planning & reporting, [Draft Determination](#), 23 April 2026.

ENA recommends amendments to the proposed timeframes to avoid peaks and troughs in workloads for networks reporting teams. The final determination should clarify timeframes around revenue reset proposals to ensure DNSPs are not required to publish a final DAPR and the first DNDP in a short timeframe. There are also state-based reporting requirements that should be considered to avoid conflicts and duplication.

Consideration in regulatory reset decisions

ENA strongly supports the proposal for DNDPs to be included in a DNSPs regulatory reset proposal, but the success of doing so is contingent on the DNDP having sufficient practical and regulatory relevance. The central issue is not whether DNSPs can prepare longer term planning documents, but whether the framework gives those documents the weight required to truly contribute to strategic outcomes. The DNDP serves as an important evidentiary input to future revenue proposals, providing additional strategic information and transparency to customers and the AER on a DNSPs long-term planning direction. The DNDP would also provide additional context on how the five year regulatory proposal fits into the networks long-term strategic investment program and forecast changes in current and emerging network pressures.

ENA strongly recommends that the final rule require the AER to have regard to the DNDP in its regulatory decisions. Currently, in the draft determination, there is no explicit obligation on the AER to consider the DNDP submitted by the network in its reset decisions on revenue or expenditure. As the DNDP will outline the long-term forecast and investment planning, it is crucial for decisions to be made with the context of the DNDP.

To ensure sufficient consideration is given, ENA recommends the AER be required to provide reasoning as to why it seeks to depart from the DNDP in its revenue decisions. This would clarify where and why the AER takes a different view of the network's long term strategic direction, providing transparency to DNSPs and stakeholders. It will also strengthen the role of the DNDP as a contextual supporting document. As the DNDP outlines the business's long-term planning direction, ENA believes requiring the regulator to justify deviations promotes good regulatory practice and ensures decisions are in the best interests of customers.

DNSPs are key enablers of the energy transition, investing to enhance and manage rapidly changing customer energy use patterns. Decisions made today will determine the network's ability to keep pace with accelerating change. Recent Victorian DNSP revenue resets highlight the impact of CER uptake and the electrification of home and transport on network demand profiles, largely from behavioural changes made at the household level. Strategic, long-term focused investment is a major opportunity to bring down the costs associated with the energy transition for all customers, and the DNDP can only contribute if it is provided sufficient weight in regulatory and investment decision-making. Revenue decisions that appropriately reflect long-term objectives and forecast changes will support a lower cost energy transition.

Purpose of the Distribution Network Development Plan

ENA supports the purpose of the DNDP as defined in draft rule clause 5.13.1 (b) to maximise the long-term interests of consumers and agrees that this purpose can appropriately guide effective use of data in investment planning. An outcomes focused purpose provides flexibility for the DNDP to evolve over time as methods for designing and applying a DNDP improve, and as approaches to CER integration and LV visibility mature. However, this purpose will only be achieved if the framework enables DNSPs to undertake meaningful long term planning that is given appropriate weight in regulatory and investment decision-making.

ENA supports DNSPs using the Australian Energy Market Operator's (AEMO) IASR as a baseline for inputs, assumptions and scenarios in the DNDP. Doing so would support consistency with the ISP and

across DNSPs. To accommodate jurisdictional differences, ENA supports flexibility for DNSPs to select its own scenarios and deviate from the IASR with justification. Localised impacts are important to consider in the DNDP as DNSPs face different challenges, including differences in CER and jurisdictional policy settings.

ENA supports an outcomes focused approach to the AEMC's proposed principles for the AER to consider in developing its guidance, as it supports ensuring the costs of data publication are proportionate to the benefits provided. Avoiding duplicating existing reporting requirements will reduce overall costs, as reflected in the proposed principles.

ENA agrees that the DNDP should not be subject to formal AER approval. Such a requirement would have added another layer of regulatory approval, duplicating existing processes. In its absence and to avoid the DNDP becoming a compliance focused document, the final rule must clearly state the AER's requirements for having regard to the DNDP in its regulatory decision making.

Data provided proportionate to the benefits

ENA believes further detail can be prescribed on data inclusions DNSPs are expected to include in the DNDP to achieve the intent of the rule change request. The rule change to date focuses on including a greater level of granular data, with a lack of detail on what such data this should include. DNSPs are already or actively progressing network hosting capacity maps to provide a greater level of granular and technical data in a customer-friendly manner, which have received positive stakeholder feedback and represent a practical mechanism to support the intent of the rule change. To retain success to date, ENA recommends the AEMC guide the AER to explicitly include network hosting capacity maps in its guidance as a method of providing more granular network data.

ENA supports a staged implementation of the new DNDP data reporting framework through the AER's guidelines, with appropriate testing and engagement, to ensure the benefits of enhanced visibility are realised at least cost to customers.

ENA is supportive of a minimum standard of data publishing, allowing flexibility for DNSPs to procure and publish more data above the standard. The minimum standard improves consistency of data availability across DNSPs and ensures all DNSPs provide the most useful core datasets. The minimum standard avoids the inefficiency of mandating that all DNSPs adopt the practices of the furthest developed where each dataset may not be economically beneficial for every network to publish.

Any additional and more granular data provided should be proportionate to benefits the data provides. Customers are the ultimate bearer of costs to obtain and report on network data, and any DNDP data should explicitly consider the costs borne by customers. It is not accurate to assume the cost savings from not developing and publishing the DAPR would cover the cost of the DNDP. The DNDP reflects an increase in granularity of data and extensive forecasting and is intended to provide more targeted information than the DAPR.

ENA emphasises the importance of the AER not duplicating DNDP reporting requirements from other public reporting such as Regulatory Information Orders (RIO) and ISP demand side factors. In its guidance development, the AER should also consider in progress rule changes, reviews and other consultations that would have an impact on the DNDP. For example, DCCEE's consultation on Distribution System Operator (DSO) is likely to introduce additional reporting requirements. Considering other work programs will reduce DNSPs overall data development and reporting costs, improving outcomes for customers.

The current regulatory framework does not directly incentivise improved data availability, which underpins the rationale for this rule change request. Historically, DNSPs have faced challenges in securing cost recovery for data granularity through revenue reset processes, particularly for

investments in LV network data. Introducing targeted incentives would provide a strong mechanism to encourage DNSPs to enhance the availability, quality, and efficiency of data provision. Incentives allow DNSPs to balance the quantity of data published above a minimum standard with the costs of providing it, and to choose the data most beneficial to their own network planning. What data is most beneficial may differ between DNSPs, reinforcing the importance of incentives to deliver investment alongside a minimum data standard. Stakeholders have highlighted the value of increased access to network data, reinforcing the case for incentivising DNSPs to act. By aligning DNSP incentives with broader system and consumer benefits, enhanced data availability can deliver long-term value. ENA recommends that the AEMC's Electricity Network Regulation Review consider incentive mechanisms to promote efficient and high-quality network data publishing.

Interaction with jurisdictional planning reforms

ENA considers the final rule and supporting AER guidelines should give greater attention to the interaction between the DNDP framework and jurisdictional planning reforms already underway or emerging across the NEM. The draft determination recognises that DNSPs operate within different jurisdictional contexts, including through existing planning, reporting and data publication obligations. This recognition should be carried through more explicitly in the final rule to avoid duplicative reporting, inconsistent planning assumptions and unnecessary implementation costs for customers.

This issue is particularly relevant in NSW and Victoria, where several planning and network visibility reforms are being progressed, overlapping with the objectives of the DNDP framework. Where jurisdictional processes or data platforms already provide information that is equivalent to or materially overlaps with DNDP requirements, DNSPs should not be required to recreate that information in a separate national template.

ENA recommends that the final rule adopt a flexible 'one set of inputs, multiple uses' approach. This would allow related planning processes to draw from common assumptions, datasets, engagement processes and published outputs wherever possible. Where existing or emerging jurisdictional planning frameworks already deliver outcomes that are equivalent to, or materially overlap with, DNDP requirements, DNSPs should be able to reference, incorporate or rely on those processes rather than duplicate them through a separate national reporting template for the DNDP.

Timeframes and transitionals

The AEMC proposes DNSPs complete an annual update of the DNDP by 31st October each year, coinciding with the due date of RIOs. Within DNSPs it is commonly the same team that develops both reporting documents, and the dual deadline could create peaks and troughs in workloads, contributing to additional costs and pressures for networks that outweigh any benefits of alignment. ENA therefore recommends the deadline for all DNDP annual updates be aligned with the current DAPR date of 31st December.

The AEMC proposes DNSPs complete the first annual DNDP update at similar timing to a revenue reset revised proposal. Since drafting of a revenue reset proposal often begins two years prior to a draft decision, it is possible for a demand forecast to materially change in this time. A DNSP is incentivised to include an updated DNDP in its revised proposal to detail material changes, provided there is flexibility to include more information than the annual update requires. However, the six week revised proposal timeframe poses challenges for DNSPs to meet the required annual update, especially in instances where there might not be sufficient benefit in doing so. Completing the first annual update after the final decision may be more beneficial for stakeholders as it would include any changes from the final approved allowances. ENA strongly recommends there should be no requirement to publish an updated DNDP as part of the revised proposal, only the option if the DNSP determines there is benefit in doing so.

DNSPs in NSW, Tasmania and ACT are due to submit revenue reset proposals to the AER by 31st January 2028 with a DNDP as supporting information. One month prior, the draft determination does not clearly exempt the same DNSPs from publishing their last DAPR by 31st December 2027. ENA considers the transitional arrangements should explicitly exempt the outlined DNSPs from publishing a final DAPR in 2027. Requiring both documents in close succession would create unnecessary duplication and would be inconsistent with the objective of replacing, rather than layering onto, the existing DAPR framework.

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Senior Regulatory Analyst, on vbaikie@energynetworks.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R Pendlebury', written in a cursive style.

Russell Pendlebury
General Manager Regulation and Policy