Part of Energy Queensland

4 June 2026

Ms Anna Collyer
Chair
Australian Energy Market Commission
Project Reference Code: ERC0410

Dear Ms Collyer

Enhancing distribution network planning & reporting draft determination

Queensland's two distribution network service providers (DNSPs), Ergon Energy Corporation Limited (Ergon Energy Network) and Energex Limited (Energex), thank the Australian Energy Market Commission (AEMC) for the opportunity to provide a submission on its draft rule, *Enhancing distribution network planning & reporting* (Draft Determination).

The AEMC's draft decision to replace the existing distribution network planning and reporting requirements with a new, fit-for-purpose framework that is free of legacy processes is a rational and welcome outcome as we consider that of the three options previously considered by the AEMC, this approach most effectively and efficiently facilitates the integration of consumer energy resources (CER) in the National Electricity Market (NEM).

We also commend the AEMC's pragmatic approach to implementing the proposed reforms, which recognises that DNSPs are at different stages of capability in meeting the needs of end users in a rapidly evolving market. This is driven by continued improvements in the economics of battery energy storage systems (BESS), accelerated customer uptake following governments' battery rebate programs, retailers expanding their load management and flexibility service offerings, and strong market interest in DNSPs' demand response programs.

By avoiding overly prescriptive requirements in the National Electricity Rules (NER) and instead requiring the development of reporting guidelines through established NER consultation procedures, will yield a collaborative approach that builds upon DNSPs' existing innovations and supports a transition pathway that progressively delivers whilst minimising unnecessary costs that would exceed the intended benefits.

However, while these are positive developments, we consider there may be benefit in further refining the proposed reforms to ensure they do not inadvertently replace existing reporting obligations with similarly onerous and complex requirements, and instead fully deliver on their intended outcomes.

Our responses to the Draft Determination's questions are attached and should you require further information or wish to discuss any aspect of these, please feel free to contact me or Lindsay Chin on 0459 642 052. Neither this letter nor the attachment contains confidential information and may be published.

Yours sincerely

Alena Chrismas
Manager Regulatory Affairs
Telephone: 0429 394 855
Email: alena.chrismas@energyq.com.au

Enclosed: - Ergon Energy Network's and Energex's responses to the Draft Determination's questions.

Ergon Energy Corporation Limited ABN 50 087 646 062
Energex Limited ABN 40 078 849 055

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Below are Ergon Energy Network's and Energex's responses to the Draft Determination's questions.

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	Feedback sought	Ergon Energy Network's and Energex's comments
1	**Does the draft rule provide appropriate guidance on the application of the 20-year planning horizon?** Does the draft rule provide sufficient guidance on how the 20-year planning horizon is to applied by DNSPS, including for their low voltage network? If not, what additional guidance is needed for DNSPs to implement this obligation?	To assist stakeholders in better understanding the implications of the draft rule, further guidance should be provided with respect to: • The interaction between the five-year Distribution Network Development Plan's (DNDP) cycle and the biennial Inputs, Assumptions and Scenarios Report (IASR) cycle. Depending on the timing of scenario updates, a DNSP's draft regulatory proposal may rely on an IASR that is up to two years old and require a substantial revision to its final proposal once a new IASR is released. It is unclear whether this situation is intended to be accommodated within the flexibility the AEMC envisages for DNSPs to depart from IASR scenarios. If the IASR is intended to be a central pillar for the industry, it may be appropriate to consider moving to an annual cycle. • Clarity on the requirement for "…detailed forecasts" as required in Schedule 5.8(a)(1) and (3) of the draft rule because we are unsure what "detailed" means. For example, detailed forecasts could include: o the impact of approved projects o known connection requests (load/generation) o for longer term general development, population growth and technology adoption but with less specific awareness of exactly when or where this will be located and

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		o temporal resolution for population growth beyond the first five years of a forecast. • The specific information intended to be captured under draft rule Schedule 5.8(a)(4): "…risks of power outages caused by severe weather events, taking into account the impacts of climate change." This is because severe weather events that drive outages (such as storms, floods, and cyclones) are typically highly localised, short in duration, and inherently difficult to predict with precision in terms of timing, location, and intensity. Even with modern meteorological capabilities, forecasts remain subject to uncertainty, including timing errors (e.g. earlier or later arrival), intensity errors (e.g. under- or over-estimation of wind speeds), and location errors (e.g. deviations in storm or cyclone paths). Network outage outcomes are influenced not only by weather conditions, but also by asset-specific factors such as age, condition, maintenance history, and surrounding vegetation. These characteristics vary significantly across the network and are not fully observable sufficiently in advance or in real time. In addition, climate change is increasing the likelihood of rare, high-impact events for which there is limited historical precedent, further complicating forecasting and modelling efforts. Ergon Energy Network and Energex place strong emphasis on natural hazard management within their planning and operational practices, while seeking to avoid inefficient augmentation that would impose unnecessary costs on customers. Recognising the inherent limitations in forecasting severe weather-driven outages with precision, both businesses adopt a risk-based and resilience-focused approach. This approach prioritises credible, high-consequence risks rather than attempting to design the network to withstand all possible extreme events. Given the inherent uncertainty, variability, and localised nature of severe weather impacts, any assessment or reporting of outage risk under this provision can only reasonably be undertaken on a qualitative, subjective, and indicative basis. Accordingly, further guidance on the expected scope, level of detail, and methodological approach for this requirement would improve clarity and consistency of application. • The applicability of reporting requirements across DNSPs' service areas. We consider these should not be applied automatically/uniformly across entire jurisdictions. Instead, assessments should be undertaken at a sub-regional level to ensure that implementation costs (e.g. assets, monitoring, data

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		collection and analysis) do not outweigh the intended benefits, and that those benefits are based on demonstrable, rather than perceived, outcomes. • The provision of a clear definition for high voltage (HV), medium voltage (MV) and low voltage (LV) distribution networks. The absence of clear definitions is causing ambiguity. For example, the Draft Determination's statement: "… low voltage distribution network (i.e. below zone substation)"[1] conflicts with our treatment of assets below zone substations as MV. • How the 20-year planning horizon is intended to be applied across different voltage levels within distribution networks, subject to resolving the definitional issues above. These network levels differ significantly in terms of: o data availability and quality o forecasting uncertainty o planning objectives o investment decision timeframes, and o the degree of development variability (e.g. network configuration changes, extensions and augmentations). Requiring a uniform level of detail or analytical expectation across all network levels risks inefficient use of resources, particularly within LV networks, and reduced or potentially misleading clarity for stakeholders, where outputs may appear highly precise without being sufficiently robust. The application of the 20-year planning horizon could be applied through explicit recognition of differentiated expectations by voltage level, and consideration of appropriate levels of aggregation, uncertainty treatment, and output formats. For example:

[1] Enhancing Distribution Network Planning and Reporting Draft Determination, piii.

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		o HV networks (connection points, sub-transmission lines and bulk/zone substations): HV network planning is asset-specific and investment-driven, supported by relatively clear capacity constraints and long asset lives. Forecasts and network planning can therefore be more granular and actionable, particularly over the first five years. These voltage levels are critical for: ▪ identifying future augmentation needs ▪ aligning with transmission planning and the ISP, and ▪ signalling large-scale system constraints and opportunities. Accordingly, it is appropriate that detailed, location-specific forecasts are maintained in the near term, and outer-year forecasts focus on directional insights through scenario analysis, rather than overly precise projections. o MV networks (11kV, 22kV, some 33kV, and Single-Wire Earth Return): MV network planning is local area-based and less asset-specific, with greater variability in load and DER uptake. Forecasting and network planning are less certain than at sub-transmission level, particularly beyond the near term. Distribution networks play an important role in identifying emerging local constraints and informing non-network opportunities. Accordingly, proportionality for distribution networks should support: ▪ aggregation at feeder levels, rather than detailed asset-level forecasts ▪ scenario-based outputs beyond the near term, reflecting higher uncertainty, and ▪ a focus on constraint risk and trends, rather than precise timing or location of issues. o LV networks (distribution transformers and LV mains): Planning for LV networks is inherently uncertain and data-constrained, with limited visibility at granular levels. Forecast outcomes are strongly influenced by localised customer behaviour, the uptake of distributed energy resources (DER), and export limits, which reduces the reliability of highly detailed predictions.

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		Notwithstanding these challenges, a range of initiatives will progressively improve DNSPs' capabilities and visibility of LV networks. In particular, the accelerated rollout of smart meters (targeting close to 100% coverage by 2030) is a key enabler of enhanced LV network visibility, as it effectively transforms each customer connection point into a distributed sensor on the network. Specifically, smart meters provide: ▪ interval consumption data (for example, 5–30 minute reads) ▪ export data (including rooftop solar and batteries), and ▪ time-of-use consumption patterns at each connection point. Furthermore, with enough meter penetration, DNSPs can: ▪ infer loading on LV feeders and distribution transformers ▪ estimate available capacity (hosting capacity), and ▪ detect localised congestion. While smart meters will make a significant contribution to improving LV network visibility, they will not be sufficient on their own. Particularly given the tendency for battery and PV to mask behind the meter customer behaviour change. As such, complementary investment will still be required in areas such as LV sensors and substation monitoring, network modelling and state estimation, and supporting data platforms and analytics. In conclusion, in Ergon Energy Network's and Energex's 2035-40 DNDPs, we support LV transparency and forecasting of assets and non-network options as they pertain to constraints at the 11kV feeder level and progressive expansion of transparency below this level, supported by DNSPs' existing innovative offerings, opportunity mapping and data exchange mechanisms. Given the above, and draft rule 5.13.1(d)(4), we strongly recommend that the AEMC: ▪ Define the term: "material" as whilst it is used in both the Draft Determination and draft rules, it is not defined in the NER. Given that "material" is inherently subjective and has a different

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		meaning depending on its purpose, the clarity and operability of the proposed rule would be improved by including a definition or guidance on its meaning. Moreover, depending on how "material" is defined, it could impose a significant burden on DNSPs, requiring them to report on all assets and non-network options that meet the materiality threshold, with unclear value for consumers, and ▪ Amend the related draft rule Schedule 5.8(a)(3) to read: "forecasts for constraints, including detailed constraint forecasts for the initial 5-year period, of metrics underpinning: …". This amendment is necessary because, if the draft rule remains unchanged, it could result in requirements to forecast non-network options in areas of the network where there were no constraints and where such options were not required. This would be illogical and impose an unnecessary, significant burden on DNSPs.
	What would be the benefit of including this additional guidance (if any) in the draft rule? As an alternative, would it be preferable for this to be included by the AER in its guidelines (section 2.4)?	We consider an industry-wide definition of HV, MV and LV would be beneficial to ensure a consistent and standardised language across reform initiatives including National CER Roadmap activities. Earlier clarification of requirements, ahead of the AER guideline's finalisation, would enhance DNSPs' compliance and possible incorporation of appropriate funding provisions in their regulatory proposals.
2	**Is the purpose of the DNDP sufficiently clear?** Is the proposed purpose and role of the DNDP within the broader planning framework sufficiently clear?	We consider that specific aspects of the DNDP's proposed purpose and role are sufficiently clear. For example, we understand that the submission of the DNDP is not for the AER's approval but rather so that the: "…DNDP can provide useful context for the DNSP's regulatory proposal and proposed investments." [2]. While we agree that the AER should not be required to formally approve the DNDP, we strongly suggest that it should have regard for the DNDP in its assessment of DNSPs' regulatory proposals, given the significant alignment between them. Furthermore, we support DNDPs:

[2] Ibid, p16.

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	If not, what amendments do you consider would improve the clarity of the DNDP's purpose?	• Serving as strategic planning and engagement documents, rather than prescriptive investment plans • Providing forward-looking insights and signals, rather than a commitment by DNSPs to specific projects or outcomes • Informing but not replacing regulatory proposals or detailed investment decision-making processes • Enhancing transparency and coordination across the planning framework, and • Facilitating stakeholder engagement and informing decision-making, including consideration of non-network opportunities. Without this understanding, there is a risk that stakeholders may interpret the DNDP as binding or determinative or expect a level of precision and commitment that is not intended. Lastly, with respect to publication of the DNDP, we do not support updating this following the final determination of a DNSP's regulatory proposal due to the policy intent that the AER is not required to approve a DNDP. Instead, we consider that changes should be communicated through the annual update process. This reflects the distinct and complementary roles of the DNDP and annual updates within the proposed framework. Updating the DNDP following the regulatory reset would: o undermine its role as a stable and coherent baseline for planning assumptions, scenarios and strategic direction o create confusion regarding which version of the DNDP reflects the authoritative planning position, and o risk shifting the DNDP toward a continuously evolving document, rather than a clear reference point for stakeholders. Conversely, maintaining a fixed DNDP ensures: o a consistent baseline against which changes can be understood, and o improved transparency in how planning evolves over time.

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3	**Have all the implementation considerations for the annual update been identified?** Does the draft rule identify all the critical planning information that would need to be updated annually by DNSPs? If not, could this information be captured by the AER guidelines published under Clause 5.13.3 of the draft rule? Should the draft rule also require DNSPs to report in the annual update on changes: - to planned network projects for the next 5 years since the strategic plan or previous year - in the likelihood of the scenarios that were considered in the DNSP's strategic plan for the next 5 years?	We support the intent of this rule change to improve transparency by providing stakeholders with timely, up-to-date information on changes to DNSPs' distribution networks, operating environment and assets, RIT-D projects, joint planning with other network service providers, non-network options considered and engagement with non-network providers. This approach enhances opportunities for flexibility service providers, including for Distribution System Operators, to thoroughly assess these changes, evaluate their commercial positions when entering into flexibility contracts, and support the ongoing development of market capability. We note that the draft rule will not require the annual update to include changes in the likelihood of the scenarios that were considered in a DNSP's strategic plan and suggests this would be more effectively implemented through AER guidelines.[3] However, we do not support this being included in the draft rule or the AER's proposed guidelines. This is because long-term network plans are inherently strategic, designed to explore plausible future pathways over a 20-year horizon rather than to produce short-term forecasts. Minor changes in inputs and assumptions may not materially affect long term planning outcomes. The requirement to report annually on changes to longer-term scenarios is inconsistent with the intent of the DNDP as a vehicle for delivering clear, stable strategic insights. It risks undermining the DNDP's role as the primary long-term planning document. Over short timeframes (e.g. year-on-year): • Changes in scenario likelihoods are typically: o incremental and highly uncertain, or o driven by temporary or emerging trends that do not justify adjustments to long-term strategic plans or formal reporting. • Frequent updates would be unlikely to materially improve decision-making and may instead: o duplicate content already captured in the DNDP

[3] Ibid., p18.

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		o introduce noise rather than meaningful insight, and o reduce the clarity, coherence, and integrity of long-term planning narratives. Material changes to scenarios are more appropriately addressed through subsequent DNDP updates. Lastly, we consider that the definition of "changes" should be made clear in the final determination to ensure complete clarity on what is required.
	What would be the benefits of including the above requirement in the draft rule rather than AER guidelines?	The benefit of including these requirements in the draft rule, rather than in the AER's guidelines, is an important design consideration and involves striking a balance between a more prescriptive framework and a light-touch approach. Specifying the annual reporting requirements for planned project and scenario changes in the rule would provide greater: • transparency • consistency across DNSPs • clarity and more effective market signalling • regulatory certainty, and • time to prepare processes and IT systems for the specific reporting requirements. Conversely, this approach would: • reduce flexibility in implementation, and • risk creating additional compliance burden.
	Should the draft rule also allow the AER to specify the form of any information or data to be provided in the DNDP and annual update?	Yes. It would be beneficial for the AER's guidelines to set out the requirements necessary to enable reported information to be effectively used to realise the intended benefits of reporting. This could include guidance on the expected users of the information and the appropriate format for dissemination. For example, whether data should be machine-readable, shared through industry platforms, or presented in a format accessible to end users.

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		Where the anticipated benefits rely on consistency across jurisdictions (such as those highlighted in Box 4 on page 21 of the Draft Determination), more prescriptive requirements may be warranted. Greater transparency and clearly articulated cross-jurisdictional requirements would support the development of flexibility markets. That said, while there is value in improving consistency across DNSPs, requirements should avoid being overly prescriptive so as not to unduly constrain flexibility in reporting.
	Would the proposed reporting dates for the annual update be simple for DNSPs to implement? If not, what is the most suitable alternative date for the annual update?	The AEMC proposes that DNSPs complete an annual update of the DNDP by 31 October each year, to align with the submission date for annual information orders. However, in Ergon Energy Network and Energex the responsibility for delivery of these two reports falls on the same teams which would lead to increased resourcing pressures and costs that outweigh any benefits of the proposed timing alignment. We therefore recommend that the deadline for the annual update be aligned with the current Distribution Annual Planning Report date of 31 December.
4	**Does the purpose provide appropriate guidance on the scope of the framework?**	We consider that the purpose of the framework should be changed from: • "To improve visibility on the state of distribution networks, in a way that maximises the benefits to current and prospective network users…" to • "To improve visibility on the state of distribution networks, in a way that maximises the benefits for the long term interests of consumers of electricity…". This is because consumers, not network users, are at the centre of the national energy objectives.[4]
	Does the framework's purpose provide clarity on the different types of data that are intended to be captured in the AER's guidelines (section 3.2)?	Yes.

[4] National Energy Objectives | AEMC.

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	If not, what types of data would not be captured by the current framing of the purpose? What would be the benefits of including this data in the framework's purpose or scope?	Ergon Energy Network and Energex have no comments.
5	**Does the draft rule provide appropriate guidance for the AER when preparing the guidelines?**	With respect to DNSPs' compliance with the AER's guidelines, we are concerned that the proposed six-month period between publication of the final guidelines and DNSPs' compliance may be insufficient to implement all new data reporting requirements, especially those that were not discussed in the guideline's development consultation stages. A staged or transitional approach should be adopted to allow for partial compliance during an initial transition period (greater than the current six months being proposed), whereby DNSPs can progressively meet reporting requirements as systems and data maturity improve. Furthermore, summary item 49 in the Draft Determination which relates to the implementation of the distribution network data reporting framework states:[5] "*49 However, the draft rule would allow the AER to make guidelines that do not treat DNSPs the same, reflecting differences in DNSPs capabilities. We therefore expect that there would be transitional arrangements in the first version of the guidelines.*" However, Clause 5.13A.2 (b) of the draft rule does not appear to reflect the above intent, as it states:[6] *(b) When developing or amending the guidelines, the AER must:* *(1) consider:* *(i) the purpose in clause 5.13A.1(b);*

[5] Enhancing Distribution Network Planning and Reporting Draft Determination, pvi.
[6] Draft National Electricity Amendment (Enhancing distribution network planning and reporting) Rule 2026, p9.

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		(ii) the net economic benefit of compliance with the guidelines; *(iii) protection of confidential information and personal information; and* *(iv) data that would otherwise be publicly available; and* *(2) follow the Rules consultation procedures.* We therefore recommend a positive obligation be placed on the AER to consider, by way of a new part (v) which recognises: "the differences in DNSPs capabilities". Similarly, clause 5.13A.2 (d) of the Draft Rule states:[7] *(d) The guidelines may require Distribution Network Service Providers to:* *(1) publish data in stages;* *(2) publish different data, according to the circumstances of the Distribution Network Service Provider;* *(3) publish a plan for how they will collect, use and publish data; and* *(4) consult with relevant stakeholders when preparing the plan under paragraph (3).* In the first sentence in part (d), we believe the wording "may require" (as it applies to parts (1) and (2)), provides the AER the option to not allow DNSPs to publish data in stages and or different data, according to their circumstances. To align with the intent of the rule change, we request that this be changed to: "Subject to their capabilities, the guidelines may require Distribution Network Service Providers to:…".
	Do the principles and the framework's purpose capture all the relevant considerations for the AER when it prepares its guidelines? If not, what	Ergon Energy Network and Energex generally support the use of guidelines to provide the level of detail necessary to minimise ambiguity, particularly where such detail is not well suited to inclusion in the NER. However, with respect to the Draft Determination's principles that will guide the AER in preparing the guidelines[8] we make the following comments:

[7] Ibid., p10.
[8] Enhancing Distribution Network Planning and Reporting Draft Determination, p24.

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	additional considerations do you consider are missing and what would be the benefits of including them in the draft rule?	• Draft Determination Principle 1: Net economic benefit of compliance with the guidelines: We do not understand the rationale or value in this principle replacing the four principles from the AEMC's Directions Paper[9] because this shifts the focus away from the key beneficiaries, being end consumers, as demonstrated by draft rule 5.13.1(b) which states: "*The purpose of the Distribution Network Development Plan is to maximise the long-term interests of consumers across a range of future scenarios*." Furthermore, whilst the draft rule may benefit NEM stakeholders and market participants in their operations, ultimately, this is all done for the benefit of end-use consumers. We therefore consider that the four principles are better than relying on a single "Net economic benefit of compliance…" principle because they decompose, operationalise and govern that broad concept in a way that is more practical, equitable and defensible, especially in the regulated infrastructure context for DNSPs. This is further explained below: o Consumer benefit (Directions Paper Principle 1) makes value explicit and tangible - A single "net economic benefit" principle assumes everyone agrees on who the beneficiaries are, how benefits arise, and when benefits occur. This is rarely true and the previous principle that explicitly requires assessment of consumer benefits: ▪ anchors the development of the guidelines to the statutory objective (long-term interests of consumers) ▪ forces clarity on how data publication improves outcomes (e.g. lower connection costs, better CER planning, increased competition), and ▪ avoids abstract or indirect benefits being overstated (e.g. "innovation potential" with no credible pathway).

[9] Ibid., p25.

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		Net benefit calculations can hide weak or speculative consumer outcomes behind large system-wide aggregates. This principle ensures benefits are real, traceable, and relevant to consumers and not just theoretically positive. o Cost–benefit sufficiency (Directions Paper Principle 2) prevents illusory net benefits - A single net economic test often underestimates implementation and ongoing costs, ignores transitional costs and operational risk and assumes marginal cost homogeneity across DNSPs. By requiring the AER to separately consider whether consumer benefits offset DNSPs' costs in the development of the guidelines, this principle: ▪ recognises that DNSPs' costs ultimately flow through to consumers ▪ prevents situations where "net" benefits depend on optimistic assumptions about uptake or future use, and ▪ encourages proportionality (lighter requirements where benefits are marginal). A single net test can justify high-cost mandates if benefits are speculative or back-loaded. This principle introduces cost discipline and realism. o DNSP capability differences (Directions Paper Principle 3) addresses equity and feasibility - A single net economic benefit test implicitly assumes DNSPs have comparable data maturity, implementation costs scale linearly and one-size-fits-all obligations are efficient. However, in reality: ▪ DNSPs vary significantly by size, IT maturity, data quality, and legacy systems ▪ uniform obligations can overburden smaller or less mature DNSPs, and ▪ high compliance costs can reduce funds available for network investment. This principle: ▪ makes capability heterogeneity explicit ▪ enables mechanisms like phasing, exemptions, minimum standards, or support, and ▪ reduces the risk of regulatory failure or non-compliance.

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		Aggregate net benefits can produce unfair or unworkable outcomes for individual DNSPs and this principle ensures feasibility without abandoning the policy goal. o Use cases (Directions Paper Principle 4) reduce option-value and speculation bias - Net economic benefit frameworks often rely on vague claims about "enabling innovation", assign high option value to data without knowing who will use it or how and discount implementation risk but inflate future upside. Requiring the AER to explicitly consider the identification of credible use cases in its guidelines' development will: ▪ result in linkages between data publication to real decisions and stakeholders ▪ improve benefit estimation accuracy ▪ allows prioritisation of high-value datasets, and ▪ support iterative development rather than big-bang releases. Furthermore, without use cases net benefit analysis tends to overstate hypothetical benefits. This principle ensures data is published because it will be used, not just because it might someday be useful. Lastly, in the NER "net economic benefit" is defined as the net economic benefit of changes to Australia's greenhouse gas emissions and the sum of the net economic benefit to all those who produce, consume or transport electricity in the NEM.[10] This requires the AER, when developing the guidelines, to first and foremost, have regard for all NEM stakeholders. However, this could be to the detriment of individual jurisdictions' DNSPs and by extension, their customers. In other words: o Benefits are system-wide but costs are localised, and o DNSPs' revenues are regulated and not linked to system-wide welfare. For the above reasons we strongly support the reinstatement of the four principles from the AEMC's directions paper.

[10] National Electricity Rules v246, p1555.

	Feedback sought	Ergon Energy Network's and Energex's comments
		• Draft Determination Principle 2: Protection of confidential information and personal information: The second proposed principle in the Draft Determination should be broadened to explicitly consider information sensitivity, including the potential for sensitivity to arise when reported data is combined, aggregated (across a network, multiple DNSPs, or reporting periods), or cross-referenced with other publicly available or readily obtainable datasets (such as address or location information). • Draft Determination Principle 3: Data that would otherwise be publicly available: We do not agree with the assessment in Table 3.1 in the Draft Determination that this principle adequately encompasses the Directions Paper's principle relating to the "feasibility of collecting and publishing data in the proposed format." The concept of feasibility is distinct, as it focuses on the effort and cost required for DNSPs to collect, prepare, and deliver the data in the specified format.
	Does allowing for additional requirements, such as the publication of data roadmaps, create an overly broad scope for the guidelines?	We support the inclusion of additional requirements in the AER's guidelines insofar as they relate to distribution planning and reporting and have a demonstrable net consumer benefit. With regards to data roadmaps, we support their use as a means of establishing a level of certainty on the timing of deliverables and providing an avenue for stakeholders to engage with DNSPs. It must be understood that such roadmaps, especially long-term roadmaps, are indicative and may shift given the rapid pace of regulatory and technological environment that DNSPs operate in, as well as factors outside of DNSPs' control and should not be relied upon by third parties to make commercial decisions.
	If so, how could this be addressed? Would additional restrictions for these provisions be sufficient or should they be a separate requirement from the guidelines?	It should be noted that as we operate in a dynamic and rapidly evolving environment, we continually review and assess the delivery of our comprehensive ICT and data program of works, which are regularly reviewed and reprioritised to ensure the safety, security, and reliability of our networks. Accordingly, the timing and allocation of resources to any new proposed requirements in the guidelines would also be considered in the context of, and evaluated against, competing requirements.