

4 June 2026

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

Submitted by email: aemc@aemc.gov.au

Reference code: ERC0410

Dear Ms Collyer

Re: Enhanced distribution network planning and reporting draft rule determination

Evoenergy welcomes the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) on its draft rule determination published 23 April 2026.

We support the views expressed in the Energy Networks Australia submission, and provide the following additional feedback.

As the energy transition continues to gain momentum and consumers continue to invest in consumer energy resources (CER), we support the need for strategic, transparent longer-term planning to support informed and efficient decision making by networks, regulators, non-network solution proponents and end consumers.

We urge the AEMC to carefully consider how the final determination best reflects a planning framework that achieves its policy intent, while providing an appropriate level of flexibility to reflect future uncertainty and the different circumstances of distribution network service providers (DNSPs). Providing adequate guidance on the role and requirements of the proposed AER guidelines, including scope, staging and proportionality of data requirements will be important in ensuring distribution network development plans (DNDPs) achieve the objective of being strategic planning documents, rather than additional regulatory burden.

We consider it necessary to require the AER to have regard to the DNDP in its regulatory decision making to ensure investment within a five year regulatory control period best reflects the long term interests of consumers through enabling forward-looking, no regrets investment over a longer time horizon than that regulatory control period.

We note the need to balance reliance on long term planning in considering investment requirements against the risk of assuming a level of precision which exceeds that achievable for longer time horizons, and encourage a framework which allows for a range of scenarios and reducing confidence levels over time to avoid stakeholders overemphasising the certainty of long term plans.

We also emphasise that planning output expectations must appropriately reflect real-world deliverability constraints and should not be interpreted as firm commitments or endorsements of specific outcomes. In Evoenergy's experience, network development is increasingly constrained by factors such as brownfield complexity, outage coordination, constructability, supply chains, resourcing, and land access. Planning frameworks that are overly theoretical risk misrepresenting what can practically be delivered within relevant timeframes, having regard to these factors.

ActewAGL House 40 Bunda Street Canberra ACT 2600 | GPO Box 366 Canberra ACT 2601
t 13 23 86 | evoenergy.com.au

We note the proposed introduction of a new data reporting framework, including the likely requirement to publish hosting capacity information with relatively high update frequency. While Evoenergy recognises that some DNSPs already provide similar outputs, and that this reform would therefore be comparatively less material for them, the uplift required for Evoenergy to implement, maintain and regularly update this capability would be more significant. In particular, the expectation (as flagged in the directions paper) of quarterly updates represents a step-change from current distribution annual planning report (DAPR) practices.

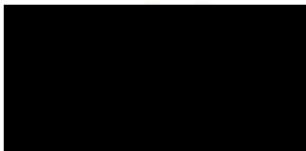
We urge the AEMC to ensure additional data and reporting requirements are proportionate to benefits and consider opportunities to remove duplication with other reporting requirements. In finalising the framework, there should be recognition that varying levels of organisational scale, maturity, resourcing and data capability exists across DNSPs, and associated costs are typically largely fixed in nature. Smaller networks such as Evoenergy do not have the same level of planning resourcing or system capability as larger DNSPs, and there is a risk that overly prescriptive or expansive reporting requirements could create a disproportionate cost for our customers.

While we support the need for consistency in long-term distribution planning, we consider it necessary to provide the option to vary inputs, assumptions or scenarios from the Integrated System Plan's Inputs, Assumptions and Scenarios Report (IASR), where this can be justified. As such, we encourage the AEMC to consider amending the proposed rule 5.13.1(d)(3) to allow for inputs, assumptions and scenarios to vary not only where it is not practicable, but also where the DNSP considers that varying these will lead to a DNDP that better serves the National Electricity Objective in its circumstances. For example, the ACT's progressive electrification policy may give cause to deviate from the IASR for the DNDP to better reflect the territory's expected pace of electrification.

As Evoenergy regulatory proposal is due by 31 January 2028, we support transitional arrangements that would exempt DNSPs on this cycle from submitting a final DAPR in December 2027.

We look forward to continuing to engage throughout this review. Please contact Gillian Symmans, Group Manager Regulatory Reviews and Policy (gillian.symmans@evoenergy.com.au) should you wish to discuss our feedback.

Yours sincerely



Megan Willcox
General Manager, Economic Regulation