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Lodged via the AEMC website

To Whom It May Concern,

### **Enhancing distribution network planning & reporting – Draft Decision**

Jemena Electricity Networks Vic. Ltd. (**Jemena**) welcomes the opportunity to respond to the Australian Energy Market Commission's (**AEMC**) *Enhancing distribution network planning & reporting – Draft Decision* and appreciates the opportunity for collaboration that the AEMC has provided throughout the process. The energy transition and the proliferation of consumer energy resources (**CER**) has changed the relationship Jemena, as a distribution network service provider (**DNSP**), has with our customers. The homes and businesses connected to our network are no longer simply electricity consumers, but rather consumer-producers.

To support this changing relationship and ensure efficient outcomes for the market, we understand the importance of working collaboratively with the communities we serve. As such, Jemena supports the intent behind the proposed distribution network development plans (**DNDP**) and annual reporting guidelines. However, we believe several amendments would ensure this rule change leads to the best possible outcome for electricity customers.

In this submission we:

- Outline our support for the proposed twenty-year planning horizon,
- Reiterate our ongoing commitment to meaningful customer engagement and express our concerns around the currency of the information that will be provided in DNDPs, and
- Support the proposed principles which will underpin the data reporting guidelines and reiterate our support for the proposed 'data roadmaps'

#### [DNDPs increase the transparency of DNSP's long-term planning and give customers assurance around the value of their investments](#)

Jemena supports the twenty-year planning horizon proposed by the AEMC and recognises the need for scenario analysis. We appreciate the AEMC's pragmatic approach both regarding low-voltage (**LV**) network forecasting and in allowing networks to depart from Integrated System Plan (**ISP**) scenarios when required.

Jemena considers that this will balance stakeholder concerns around the need for consistency in demand forecasting (at both the distribution and transmission levels) while also recognising that growth is not uniform across jurisdictions. The ability to depart from ISP scenarios when required is particularly important, given that DNSPs will be expected to engage with stakeholders as we develop our DNDPs. By ensuring each network's unique characteristics are reflected in its demand forecast, the needs of our customers are not lost to averages.

We note that the draft rule focuses only on the obligations of the DNSP. This contrasts with the AEMC directions for gas network service providers within the *Gas Networks in Transition Directions Paper*. In gas, the direction of the AEMC would also require the Australian Energy Regulator (**AER**) to consider the longer-term outlook and assess and report on the longer-term consequences of its decision. The intent is to support more informed regulatory decision-making and to provide consumers and other stakeholders greater transparency of the potential implications of such decisions. This should be given further consideration in the National Electricity Rules and we look forward to further engagement on this through the upcoming Electricity Network Regulation Review.

[While stakeholder fatigue is concerning – this customer assurance can only be achieved if the plan is deliverable.](#)

We understand the increasingly substantial role consumer choices play in shaping electricity networks. In addition to our ‘business-as-usual’ customer engagement, Jemena has also conducted an award-winning customer engagement programme dedicated to ensuring our customer preferences were reflected in our electricity distribution price review (**EDPR**) proposal.<sup>1</sup> While we can attest to the value this brings, we also note that meaningful engagement is an incredibly involved process that requires significant input from both the DNSP and customers/customer representatives.

As such, Jemena supports the AEMC’s objective of reducing stakeholder fatigue by aligning the engagement required for our DNDP preparation with our EDPR customer engagement. However, we are concerned about the timing implications of this and wary of the possible frustrations caused by engaging stakeholders and then not being able to deliver on their preferences.

For example, it is generally expected that DNSPs will update their underlying demand forecasts to reflect the most recent underlying information as part of their revised proposal.<sup>2</sup> This could mean a change in the projects proposed for their required timing, which may result in a departure from the DNDP before the period has even begun. Additionally, if a DNDP is submitted to the AER along with an EDPR proposal that is only partially accepted, the network business will have to reprioritise investments to meet the approved allowance, which may also result in a departure from the DNDP.

[The proposed data reporting principles are reasonable](#)

We understand the consumer (and industry) frustrations with the current Distribution Annual Planning Report (DAPR), particularly the lack of visibility it provides for conditions on the LV network. It seems clear that the data reporting requirements currently included in the NER are no longer fit for purpose, given the energy transition. Therefore, Jemena supports removing these requirements from the NER and replacing them with an AER guideline that can be more responsive to the changing stakeholder needs.

Jemena supports the proposed core principles that the AER must follow when developing these guidelines. Particularly “*would the data otherwise be publicly available*” as this will safeguard against the reports becoming a duplicative compliance exercise for networks, while also preventing the document from becoming dense, unwieldy and difficult for stakeholders to engage with.

[However, we cannot guarantee we can be compliant within six months](#)

While we support the intent behind these guidelines, we cannot confirm we will reach compliance within six months of their creation until we have more information about their content. For example, if the final guidelines required DNSPs to publish data that we do not currently collect, nor validate, Jemena could be required to make a significant investment in our IT systems to capture and share this data.

Therefore, while we would have every intention of reaching compliance, we seek a longer commencement period of at least 24 months for any LV data reporting. This longer period is required especially due to the

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<sup>1</sup> Energy Consumers Australia, [Consumer Engagement Report Highlights Network Innovation | Energy Consumers Australia](#), April 2020

<sup>2</sup> AER, Draft Decision Attachment 5 - Evoenergy Electricity Distribution Determination 2024 to 2029, Appendix A.1 and AER, Final Decision Attachment 5 – SA Power Networks Electricity Distribution Determination 2025 to 2030, Appendix A.2 provide an overview of these required updates.

significant reforms and system changes already underway, increasing the projects' delivery risks and the costs which are borne by our customers.

#### Data roadmaps provide a neat balance between data sharing and prudent and efficient costs

We support the AER adopt 'data roadmaps' as suggested by Energy Consumers Australia in its initial rule change request. This allows networks to develop the capabilities and systems required in a strategic fashion, minimising the costs borne by end users while also providing oversight of when each data set is available.

As a DNSP, we understand our role in facilitating an efficient and equitable energy transition for both customers who can invest in CER and those who cannot. We look forward to working with the AEMC to ensure we can meet the intent the proposed rule change, at the lowest possible cost to all customers.

If you have questions regarding the above, please feel free to contact Chloe Finn, Senior Regulatory Advisor on 03 9173-7000 or [chloe.finn@jemen.com.au](mailto:chloe.finn@jemen.com.au)

Kind regards,

A handwritten signature in blue ink, appearing to read 'Matthew Serpell', is positioned above a thin yellow horizontal line.

Matthew Serpell  
Manager, Electricity Regulation