



4 June 2026

Anna Collyer
Chair
Australian Energy Market Commission

Lodged online: www.aemc.gov.au

Dear Ms Collyer,

Enhancing Distribution Network Planning and Reporting – Draft Determination

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC's) draft determination on the Enhancing Distribution Network Planning and Reporting rule change.

Origin supports the direction of the draft determination and the Commission's decision to make a more preferable draft rule. Origin considers that the proposed reforms are a practical and proportionate evolution of the existing distribution planning and reporting framework and should improve the transparency, consistency and accessibility of distribution network planning and information across the National Electricity Market (NEM).

In particular Origin supports:

- the replacement of the Distribution Annual Planning Report (DAPR) with a longer-term Distribution Network Development Plan (DNDP), supported by an annual update;
- the requirement for Distribution Network Service Providers (DNSPs) to undertake scenario analysis using AEMO's Inputs, Assumptions and Scenarios Report (IASR) as a baseline, while retaining flexibility to depart where justified by local circumstances;
- stronger alignment between distribution planning, DNSP regulatory proposals and broader system planning processes, including the Integrated System Plan (ISP); and
- the establishment of a separate distribution network data reporting framework, supported by guidelines developed by the Australian Energy Regulator (AER).

Origin considers that the increasing importance of distribution-level network development to the energy transition warrants a more forward-looking and transparent planning and reporting framework. The proposed DNDP, together with the new distribution network data reporting framework, should improve visibility of both future network development and current network conditions, supporting more informed decision-making, better coordination across the sector and a more efficient transition.

AER guidelines

Origin supports the Commission's decision to adopt a principles-based framework in the Rules for both the new planning and reporting frameworks, supported by AER guidelines.

The detailed requirements associated with these frameworks are likely to evolve over time as network capabilities improve, data availability increases and broader CER reforms progress. The AER is well placed to develop and maintain the guidelines given its existing role in network regulation and its experience administering planning, forecasting and reporting frameworks across the NEM.

Origin also supports the draft rule's requirement that the AER develop and amend the guidelines in accordance with the consultation procedures in rule 8.9 of the National Electricity Rules (NER). This is an important safeguard that will ensure stakeholders have appropriate opportunities to provide input as the planning and reporting frameworks evolve over time.

In developing the guidelines, Origin encourages the AER to focus on proportionality, practicality and avoiding duplication, particularly given related reforms on distribution visibility, data sharing and CER integration, including the National CER Roadmap, the AER's Low Voltage Network Visibility Project and AEMO's CER Data Exchange.

In relation to one specific question within the draft determination — 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 — Origin considers that the AER should be permitted to specify the form of information and data where doing so would improve consistency, accessibility or comparability for stakeholders. Providing the AER with this discretion does not require a highly prescriptive approach. Rather, it provides flexibility to introduce standardised formats where they deliver clear benefits, while allowing DNSPs to retain flexibility where standardisation is unnecessary.

Annual updates

Origin supports the inclusion of an annual update to preserve transparency between DNDP cycles.

The annual update will play an important role in maintaining visibility of material planning developments, including changes to network conditions, investment priorities, RIT-D activities and non-network opportunities. Given the five-year interval between DNDPs, it is important that stakeholders continue to have access to timely information regarding significant planning developments and changes in network outlooks.

If you wish to discuss any aspect of this submission further, please contact Megan Findlay at Megan.Findlay@originenergy.com.au.

Yours sincerely,



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