

9 June 2026

Australian Energy Market Commission  
Level 15, 60 Castlereagh Street  
Sydney NSW 2000

Email: [aemc@aemc.gov.au](mailto:aemc@aemc.gov.au)

Marjorie Black House  
47 King William Road  
Unley SA 5061

P. 08 8305 4222  
F. 08 8272 9500  
E. [sacoss@sacoss.org.au](mailto:sacoss@sacoss.org.au)  
[www.sacoss.org.au](http://www.sacoss.org.au)

ABN 93 197 662 296

**RE: Enhancing Distribution Network Planning and Reporting: Draft Rule Determination – ERC0410**

The South Australian Council of Social Service (SACOSS) is the peak body for non-government health and community services in South Australia with a mission to advocate for the interests of people on low incomes or experiencing disadvantaged across the state. We thank the Australian Energy Market Commission (AEMC) for the opportunity to provide feedback on the *Enhancing Distribution Network Planning and Reporting: Draft Rule Determination*, dated 23 April 2026<sup>1</sup> (the Draft Determination).

SACOSS refers the AEMC to the individual submission to this process from Christian Alexander, a Deakin University student and Research & Policy Coordinator and a Policy Advisor with Darling Downs Environment Council, writing in a personal capacity, dated 9 June 2026. We lend our strong support for the submission, which we consider provides meaningful and actionable suggestions for improvements to the Draft Rules that would strengthen the proposed DNSP planning and reporting frameworks and result in better long-term outcomes for consumers.

SACOSS also refers the AEMC to our previous submission on this process,<sup>2</sup> where we supported the proposed reforms to enhance DNSP planning and reporting, and highlighted the urgent need for disaggregated energy consumption data to drive policy development aimed at addressing systemic inequities. Our submission to the AEMC's Pricing Review Draft Report also points to the significant and growing energy affordability challenges facing low-income South Australian households and calls for the AEMC to support our ongoing requests for publicly reported disaggregated network consumption data.<sup>3</sup>

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<sup>1</sup> AEMC, [Enhancing Distribution Network Planning and Reporting: Draft Rule Determination](#), dated 23 April 2026

<sup>2</sup> SACOSS, [Submission to the AEMC on the IDSP Rule 2026 Consultation Paper](#), July 2025

<sup>3</sup> SACOSS, [Submission to the AEMC on the Pricing Review Draft Report](#), 28 February 2026, SACOSS, [Submission to the AER on SAPN's 2025-30 Revised Regulatory Proposal](#), January 2025, SACOSS, [Submission to the AEMC on Consumption Benchmarks Rule Change](#), July 2023

As previously submitted, SACOSS is deeply concerned about the increasing inequity in the distribution of electricity costs across all elements of the price stack. Non-transparent retail trading practices and risk management strategies, as well as an increasingly volatile wholesale market and the future costs of the energy transition - including forecast distribution and transmission network expenditure, jurisdictional scheme costs and metering costs - all combine to place additional and increasing cost and risk burdens on residential consumers. Low-income / low-wealth households, renters and others unable to reduce grid consumption through access to distributed energy resources, disproportionately bear the burden of these costs.

This consultation represents an important opportunity to ensure distribution network service providers (DNSPs) publicly report on disaggregated energy consumption data. There is currently a lack of meaningful data on household energy use, with the last *Household Energy Consumption Survey* conducted by the ABS in 2012,<sup>4</sup> and DNSPs are no longer required to report on energy consumption under the Rules.<sup>5</sup>

The AEMC's Pricing Review team has undertaken an analysis of DNSP consumption data at a post code level, disaggregated into 'non-CER, solar-only and battery household groups'. This data was '*helpfully provided by DNSPs*',<sup>6</sup> and formed the basis for calculating distributional impacts of tariff design. Given our rapidly changing energy system (escalating home battery uptake, data centres, electrification), increasing DNSP / TNSP expenditure and jurisdictional scheme costs, it is vital that policy makers, governments and market bodies have access to accurate data to drive policy responses to the inequitable impacts of the current system.

As part of the reforms considered in this process, we strongly submit DNSPs should **be required** to report on residential consumption (and export) data at a postcode level (which can be overlaid with the SEIFA), and separated into solar-only, solar-and-battery, battery-only and non-solar/non-battery households. This could be separately reported for smart meter households, with annual consumption for accumulation meter households (likely to be non-solar / battery) also required. Including accumulation meter households is important as we understand potentially 20% of households may miss out on having a smart meter installed due to site remediation costs and other barriers in South Australia. These households are likely to be amongst the most disadvantaged.

Separately reporting on small business (solar, battery, non-solar) and industrial consumption would also be useful to inform analysis on allocation of network costs.

We also consider publicly reporting on DNSP consumption data is central to tracking and comparing AEMO's 'underlying', 'delivered' and 'operational' consumption forecasts, directly linked to cost recovery, network expenditure drivers and allocation of network costs between industry and residential consumers.

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<sup>4</sup> ABS, [Household Energy Consumption](#), 2012, see also The Australia Institute, [How low income households use electricity](#), January 2018

<sup>5</sup> SACOSS, [Submission to the AEMC on Consumption Benchmarks Rule Change](#), July 2023

<sup>6</sup> AEMC, [Smarter, cleaner, cheaper energy: What network reform means for different consumers](#), 23 April 2026, p.11

The Draft Determination poses the following questions (question 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? 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?*

For reasons outlined above, SACOSS does not consider the framework's current purpose is sufficiently broad to capture the different types of data (including consumption data) that would drive decision-making and policy development to not only maximise shared benefits, but also to minimise future costs to consumers, and allocate those costs more fairly.

Draft Rule 5.13A.1(b) currently provides:

*The purpose of publishing the data is to improve visibility on the state of distribution networks in a way that maximises the benefits to current and prospective network users.*

SACOSS suggests this Draft Rule should also include a reference to 'minimising costs', for example:

*The purpose of publishing the data is to improve visibility on the state of distribution networks in a way that **minimises costs** and maximises the benefits to current and prospective network users.*

We would welcome the opportunity to discuss our submission further. If you have any questions in relation to this submission, please contact me at [georgina@sacoss.org.au](mailto:georgina@sacoss.org.au) or 8305 4214.

Yours sincerely,



**Georgina Morris**  
Senior Policy Officer  
South Australian Council of Social Service