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Integrated Distribution System Planning – ERC0410

Submission via AEMC website

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ERC0410 – Integrated Distribution System Planning – Directions Paper

AGL Energy (**AGL**) welcomes the opportunity to provide responses to the Australian Energy Market Commission’s (**AEMC**) Integrated Distribution System Planning (IDSP) directions paper.

AGL supports Energy Consumers Australia’s (ECA) Rule change proposal and agrees with the need to increase transparency of distribution network conditions and hosting capacity. AGL also supports the AEMC’s intent to focus the Rule change on addressing two emerging challenges – increasing uncertainty and complexity on long-term distribution network planning and limited information available for the low-voltage distribution network.

AGL supports the AEMC’s preferred policy (option 1) – i.e., to establish a new strategic planning report and to reform the distribution annual planning process. AGL would also support policy option 2, if it were carefully designed to improve transparency in long-term planning, as there are advantages in reducing the need for third parties to refer to multiple planning documents. AGL does not consider policy option 3 would address the challenges identified by the AEMC.

In relation to policy option 1, AGL’s view remains that the IDSP process presents an opportunity for distribution network service providers (DNSPs) to undertake joint planning for high priority areas, such as capital cities, Renewable Energy Zones, and to service large loads such as data centres. AGL also notes that because DNSP regulatory reset process occur in different years across jurisdictions, there is a risk of misalignment between the development of the strategic plans and AEMO’s Integrated System Plan (ISP) process. This could reduce the usefulness of the information exchanged between parties and make comparison between the ISP and IDSP scenarios harder.

AGL supports changes to the Rules to include new low-voltage network data obligations for DNSPs, and the AEMC’s staged transition where the new network data reporting requirements are implemented within 1 to 2 years. Ideally, the strategic planning element of the Rule would be brought forward as the seven-years implementation period is long in the context of the pace of the energy transition. AGL supports the data being presented in a separate source to the DAPR, if this is easily accessible to external parties and referenced consistently across DNSP planning documents.

With regards to the proposed Australian Energy Regulator (AER) reporting guidelines, AGL acknowledges the flexibility introduced by prescribing reporting requirements within guidelines instead of the Rules. This is particularly important to avoid anticipating the outcomes of the CER Roadmap and ensuring the identified data sharing needs can be incorporated in a timely manner. However, the Rules should establish a framework for the AER’s guidelines to operate within, and to more closely



guide the DNSPs' reporting obligations. As currently drafted, the AEMC's proposed principles would enable DNSPs to feasibly argue against new obligations based on cost or data availability, while interested parties would find it difficult to counter these arguments due to information asymmetries.

At a minimum, DNSPs should be required to publish data that is already available or will be available in the short term (e.g., power quality data through the *Accelerating Smart Meter Deployment Rule*). The AEMC could also consider whether a minimum level of data sharing can be prescribed within the Rules – for example, ensuring all DNSPs deliver visualisation of network constraints in a granular map and/or publish detailed hosting capacity metrics and information on utilisation, export capacity and low-voltage network insights. The format of this data should be determined in close consultation with external stakeholders and should be subject to sufficient quality assurance to ensure it can be used to address the necessary use cases.

If you have any queries about this submission, please contact Andrea Espinosa on aespinosa2@agl.com.au.

Yours sincerely,

Kyle Auret

Senior Manager Policy and Market Regulation

About AGL

Proudly Australian since 1837, AGL provides over 4.5 million gas, electricity, and telecommunications services to our residential, small, and large business, and wholesale customers across Australia. AGL operates the largest private electricity generation portfolio in Australia, with a total operated generation capacity of almost 8000 MW across Australia as of 30 June 2025. AGL owns Australia's largest privately-owned fleet of hydro assets and operates the largest portfolio of renewables and storage assets of any ASX listed company. Since 2006, AGL has invested billions of dollars in the construction and delivery of over 2 GW of renewable and firming capacity in the National Electricity Market (NEM).