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### [Enhancing Distribution Network Planning and Reporting](#)

AGL Energy (AGL) welcomes the opportunity to comment on the Australian Energy Market Commission's draft determination on Enhancing Distribution Network Planning and Reporting.

#### [Overview](#)

The current regulatory framework still reflects legacy assumptions about network planning and service delivery. As consumer energy resources (CER) and flexible demand expand, timely and decision-useful network information becomes critical to support efficient investment, enable third-party participation and avoid unnecessary regulated expenditure.

AGL supports the intent of the draft determination and its focus on improving transparency and strengthening long-term distribution planning. However, the draft rule still relies too heavily on high-level principles and future guideline development. The Rules should set the minimum substantive obligations, with AER guidelines dealing with implementation detail and refinement.

AGL's main concerns are that the draft rule does not yet establish clear minimum data sharing obligations, provide sufficient low-voltage visibility, or ensure that planning and data outputs will be timely, granular and decision useful in practice. The draft determination moves in the right direction through the DNDP, annual update and guideline frameworks, but it still leaves too much to downstream implementation. Without stronger rule-level direction, the framework risks improving process without delivering the transparency and contestability needed in practice.

AGL therefore considers that the final rule should establish clearer minimum data publication requirements, strengthen expectations for low-voltage visibility, require more useful annual update content, and require immediate publication of available data.

Together, these changes would materially improve the framework's ability to support efficient investment, reduce information asymmetries and enable more effective competition in non-network and other contestable services.

### The refined option 3 is an improvement, but stronger rule-level requirements are still needed

AGL recognises that the draft determination materially improves on the version of option 3 set out in the directions paper. In particular, the DNDP, supported by an annual update, goes some way to addressing the loss of near to medium term visibility that underpinned AGL's earlier preference for option 1 and its potential support for option 2 if carefully designed.

AGL remains concerned, however, that the refined framework still leaves too much of the substance of planning and data disclosure to DNSP discretion and future AER guidelines. A DNDP supported by an annual update does not, by itself, ensure minimum, decision useful outputs across the NEM. The final rule should therefore include stronger safeguards for low-voltage visibility, more useful annual update content, and clearer minimum data publication requirements that support competition in non-network and other contestable services.

AGL also considers that the annual update should provide clearer visibility of material changes since the previous release DNDP. The draft determination already uses the annual update to preserve near to medium term transparency and includes reporting on network changes, RIT-D progress, joint planning, and non-network engagement. However, the draft rule should also require reporting on changes to near term investment plans, key assumptions, scenario likelihoods, and emerging constraint areas. Without this, the annual update may preserve visibility in form without providing a sufficiently useful picture of changes between DNDP cycles.

### The Rules should prescribe minimum data sharing obligations

AGL supports the direction of a new data reporting framework, but the draft rule leaves too much of the outcome to future implementation. The draft determination correctly identifies the need for greater visibility and consistency and gives the AER an important role through guidelines. However, the Rules should still establish minimum data publication requirements and core guardrails, with AER guidelines addressing implementation detail, standardisation, sequencing and future refinement.

This issue is most acute at the low-voltage level, where transparency gaps are greatest and improved visibility is central to efficient CER investment and non-network solutions. The draft rule recognises the importance of better low-voltage visibility, but does not yet establish baseline expectations for sufficiently granular, location-specific information. AGL therefore considers that minimum low-voltage data requirements should be specified in the Rules, with AER guidelines supporting implementation detail rather than defining the substance of the obligation.

The Rules should also make clear that data must be published on a timely, forward-looking, and sufficiently granular basis if the minimum data-sharing obligation is to be useful in practice. At a

minimum, the framework should support publication of information that helps stakeholders understand where constraints are emerging, how network conditions are evolving, and where there may be scope for local solutions over time, including indicators such as hosting capacity, forecast load growth, network utilisation, export limits, curtailment, voltage performance, and likely constraint type. Without clearer requirements of this kind, the framework may improve disclosure in form while still falling short of providing actionable data.

Improved planning and data transparency should also support competition by reducing information asymmetries between DNSPs and third-party providers. If planning outputs remain too broad, delayed or inconsistent across DNSPs, third parties will continue to face barriers to identifying and competing for non-network and other contestable opportunities.

#### The Rules should require immediate publication of available data

The draft determination would improve data availability through a future AER guideline process, with implementation not expected until 2028. AGL recognises the rationale for that staged approach. However, DNSPs already collect, and in many cases publish, substantial network data through existing planning and operational processes. In this context, AGL considers it feasible and proportionate for the Rules to require publication of a minimum baseline dataset at commencement, covering data that is already available or expected to be available in the near term.

Publishing readily available data at the outset would deliver immediate transparency benefits and reduce information asymmetries without imposing significant additional costs on DNSPs. That baseline dataset should then form the foundation of an ongoing obligation, with the AER guideline process used to standardise formats, expand scope and progressively incorporate more granular datasets over time where justified by net market benefit. This would correct inconsistent publication of data already held and used by DNSPs, rather than impose a wholly new reporting burden.

DNSP cost and capability constraints should inform implementation timing rather than determine whether additional requirements are justified.

If you have questions about this submission, please contact Anton King at [aking6@agl.com.au](mailto:aking6@agl.com.au).

Yours sincerely,

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