

20 May 2025

Mr Gavin Fox
General Manager, Network Pricing
Australian Energy Regulator
GPO Box 3131
Canberra, ACT, 2601

Email: AERPricing@AER.gov.au

Dear Gavin,

AER Proposed Pricing Methodology Guidelines and Information Collection

Energy Networks Australia (ENA) welcomes the opportunity to make this submission in response to the Australian Energy Regulator's (AER) Proposed Pricing Methodology Guidelines and Information Collection arrangements that facilitate the implementation of the AEMC rule change for any new government interconnection cost allocation agreements.

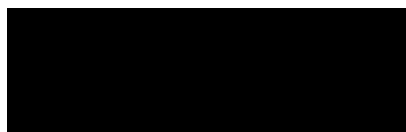
ENA represents Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia. This submission is on behalf of transmission members.

ENA appreciates the discussions and process to date with the AER on this matter, however consider that the final decision should reflect the implementation requirements of the final rule only. ENA recommends that AER clarify the following matters in its final determination;

- That the new defined terms introduced into the National Electricity Rules (NER) and new information templates do not apply to a transmission network service provider (TNSP) who is not a Coordinating Network Service Provider (CNSP), such as AusNet and Ausgrid, who have transmission pricing methodologies but are outside the scope of the new arrangements.
- That the new defined term "total regional annual aggregate revenue requirement" will be introduced in a TNSPs' pricing methodology at the time of the next revenue proposal where they are the CNSP or if a new government interconnector (I/C) cost allocation agreement comes into effect before the next regulatory period commences.
- In clause 2.9 b), which relates to a CNSP's pricing methodology, clarify that the subpoints will only apply to CNSPs with a new government I/C cost allocation agreement that commences after 3 July 2025.

In the meantime, if you would like to discuss this submission, please contact Verity Watson ([REDACTED]) in the first instance.

Yours sincerely,



Dominic Adams
General Manager Networks