

31 October 2025

Clare Savage
Chair
Australian Energy Regulator

Dear Ms Savage,

**2025 review of network performance reporting for regulated electricity and gas networks
Consultation Paper**

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Regulators (AER) 2025 review of network performance reporting for regulated electricity and gas networks Consultation paper.¹

ENA is the national industry body representing 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.

ENA continues to support the purpose of the network performance report (NPR) to analyse key trends and outcomes of operational and financial performance of networks. The NPR is a useful tool to improve transparency of networks performance to stakeholders. Consideration should also be given to jurisdictional and environmental differences across networks as all networks have different characteristics which impact and define their performance.

Any proposed changes to reporting methodologies stemming from this review must be accompanied by thorough explanations and undergo formal consultation prior to being implemented. Changes to reporting requirements should also be accompanied by a cost-benefit analysis. This would help ensure any additional requirements are proportional to the value provided and minimise the risk of increasing the regulatory burden for networks.

ENA does not support reducing the historical time series data for operational performance to not include data from earlier than 2014. Many network assets have economic lives much longer than this period and to have a full understanding of a network's performance, a longer historical time series is required. Since this data is historical, updating the data annually may not be especially time consuming and ENA strongly recommends still including all historical data in time series analysis to provide a full picture of operational performance.

Reflecting the growing proportion of connections with consumer energy resources (CER), ENA recommends the AER incorporate additional data related to network utilisation and constraints to more accurately measure a two-way energy flow environment. Measurements of ratcheted maximum demand as a standalone indicator are increasingly less reliable in an environment of increasing CER. Including minimum demand may help to better consider the bi-directional use of

¹ AER, [2025 review of network performance reporting for regulated electricity and gas networks](#), Consultation paper, 7 October 2025

network assets. ENA supports further exploration of metrics that would consider bi-directional energy flows.

ENA does not support the transition to data-only reporting as contextual analytical commentary must often be considered to understand performance trends. Analytical commentary is useful in helping stakeholders interpret complex financial and operational data and removing this commentary risks reducing transparency and the usefulness of the NPR, especially for communicating technical data to non-technical audiences.

ENA supports the proposed new priorities for 'emissions reduction targets' and 'export services' in future network performance reporting. However, further consideration is needed for developing approaches to emissions-related performance reporting to ensure any information presented is both meaningful and reflects areas where networks have genuine influence. Where actions contribute to emissions reduction targets as the result of jurisdictional schemes, inclusion of clear definitions and methodologies is required to guarantee consistent reporting across networks.

If you wish to discuss any of the matters raised in this response further, please contact [REDACTED], [REDACTED], on [REDACTED].

Yours sincerely,

[REDACTED]

[REDACTED]