



Part of Energy Queensland

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Network Performance Reporting  
Australian Energy Regulator  
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### **Submission to the AER's 2025 Review of Network Performance Reporting for Regulated Electricity and Gas Networks**

Ergon Energy Corporation Limited (Ergon Energy) and Energex Limited (Energex) welcome the opportunity to provide feedback on the Australian Energy Regulator's (AER's) consultation paper regarding the review of network performance reporting for regulated electricity and gas networks.

We support the AER's continued focus on transparency, accountability, and stakeholder engagement in network performance reporting and offer the following key considerations for future development:

- The importance of carefully reviewing the interpretation and weighting of performance metrics, particularly as traditional one-directional, volume-based indicators become less reflective of network dynamics.
- The need to ensure that any new reporting requirements are subject to cost-benefit consideration, to avoid unnecessary data collection where the effort to produce outweighs the practical value or insight.
- The opportunity to introduce a new reporting priority focused on Network Constraints and System Load Dynamics, to better reflect the operational realities of two-way energy flows, minimum system load, and electrification-driven demand shifts.

We also support the proposed integration of export services reporting into the main network performance report, provided the data is clearly segmented and remains meaningful for stakeholders.

Our detailed responses to the consultation questions are included in **Attachment 1**.

We appreciate the AER's engagement on this matter and look forward to continued collaboration as the reporting framework evolves to support the energy transition. If you have any questions related to this consultation response, please contact me or [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

## Attachment 1: Review of Network Performance Reporting for Regulated Electricity and Gas Networks: Ergon Energy's and Energex's Response to Consultation Questions.

Consultation Questions	EQL comments
<b>Questions for network performance</b>	
1. What are your views on the accessibility of our network performance reporting? How could we improve our network performance reporting to make the information more accessible or insightful?	<p>Ergon Energy and Energex consider that the current network performance report meets accessibility expectations through its use of visual elements such as charts, graphs, call-out boxes, and the accompanying infographic. The use of direct and clear language further supports stakeholder engagement and comprehension.</p> <p>We are also supportive of the proposed transition to interactive Power BI dashboards, which would allow users to explore data more deeply and interrogate trends more intuitively. However, it's important that downloadable Excel datasets are maintained in parallel to ensure transparency and support offline analysis. This two-pronged approach would cater to a broader range of stakeholder needs and improve overall usability.</p> <p>To enhance the report's insights, we suggest incorporating more targeted commentary on the implications of performance outcomes for different stakeholder groups.</p>
2. What are your views on the current analysis and insights in our electricity and gas network performance reports? Does the analysis and insights provide relevant and valuable information for stakeholders to assess NSP performance?	<p>The report's analysis is robust, particularly in its coverage of capital expenditure trends, regulated asset base movements, incentive scheme outcomes, and financial performance. These elements support transparency and accountability under the incentive-based regulatory framework.</p>

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<p>3. How could we expand our analysis and insights in our electricity and gas network performance reports? What additional analysis or insights would be relevant and valuable to stakeholders?</p>	<p>Ergon Energy and Energex consider there is room to improve the current reports to incorporate more consumer-centric insights. This could be done through further exploration of performance outcomes at a disaggregated customer level. This would allow for more nuanced analysis of performance outcomes through:</p> <ul style="list-style-type: none"> <li>• improved visibility of how different customer groups experience network services</li> <li>• equity-focused analysis and policy development, and</li> <li>• enhanced understanding of the impacts of electrification, consumer energy resources integration, and tariff reform in different sectors.</li> </ul> <p>We also recommend expanding the analysis to reflect the evolving energy landscape and consideration of bi-directional use of network assets and how this can influence and/or skew performance results in some instances.</p>
<p>4. What analysis could be excluded from our electricity and gas network performance reports? Would you prefer data only reports that present minimal or no analysis or insights?</p>	<p>Ergon Energy and Energex are not supportive of a shift to data-only reporting. Analytical commentary is essential for contextualising performance trends and helping stakeholders interpret complex financial and operational data. Removing this would reduce transparency and limit the report's usefulness, especially for non-technical audiences.</p>
<p>5. What are your views on the operational and financial data we currently report in our electricity and gas network performance reports? Does this operational and financial data provide relevant and valuable information to assess NSP performance?</p>	<p>The operational and financial data currently reported provides a strong foundation for performance assessment. It's useful for tracking expenditure, asset base movements, and service reliability.</p> <p>Nonetheless, we recommend the AER consider incorporating additional data related to network utilisation and constraints as the current metrics are insufficient in a two-way energy flow environment. We note that the AER has partnered with the University of Technology Sydney to develop improved metrics and we support that collaboration. We have included further commentary regarding this in our response to</p>

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	question 4 of the ' <b>Questions for Objectives and Priorities for Network Performance Reporting</b> '.
6. What are the emerging trends and issues that we could include in our future electricity and gas network performance reports? What new information should we collect to assess NSP performance in the energy transition?	<p>Additional emerging trends and issues that could be considered, some of which have previously been identified by the AER, include:</p> <ul style="list-style-type: none"> <li>• The electrification of homes and appliances and the impact this may have on network utilisation and investment trends, and</li> <li>• Electric vehicle penetration, particularly in the context of impacts on demand profiles and augmentation investment.</li> </ul>
7. What information is no longer relevant in the assessment of NSP performance? Why is this information no longer relevant?	Ergon Energy and Energex make no comment.
8. What are your views on our current operational and financial performance datasets? Do they provide the information necessary to assess NSP performance? Is the information presented effectively for your analysis?	As previously noted, the inclusion of interactive Power BI dashboards, will allow users to explore data more deeply and interrogate trends more intuitively.
9. What are your views on our proposed plan to reduce the historical time series in our datasets to only include operational performance data from the 2014 regulatory year?	Ergon Energy and Energex support the proposed reduction of the historical time series in the datasets used to inform the network performance reports, limiting it to operational performance data from the 2014 regulatory year onward. Aligning the operational performance data timeline with the financial performance data timeline is a logical and practical approach that enhances consistency and comparability across reporting periods.

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10. What are your views on our current electricity and gas infographics? What changes or improvements could be made to the infographics?	The infographics are helpful but could be improved. Exploring interactive visual summaries through the use of Power BI could enhance stakeholder engagement.
11. What are your views on our proposed plan to integrate our export services network performance reporting into the 2026 Electricity and gas network performance report?	We support the proposed integration of export services reporting into the main performance report. It reflects the growing importance of distributed energy resources and aligns with the energy transition. To ensure clarity and usability, export service data should be clearly segmented from traditional operational and financial metrics. Consistency in export metrics will also be critical to enable meaningful comparisons and support stakeholder analysis. If there is data being collected with respect to export services that is not being valuably used to report performance outcomes or trends, we recommend the AER remove those data requirements from future Regulatory Information Orders.
<b>Questions for Objectives and Priorities for Network Performance Reporting</b>	
1. What are your views on our proposed objectives for network performance reporting? Are the proposed objectives appropriate for the applicable NSPs?	Ergon Energy and Energex are generally supportive of the proposed objectives, outlined in table 4.1 of the consultation paper. They remain relevant and effective in promoting transparency, accountability, and improved performance across network service providers (NSPs). These objectives are well-aligned with the National Energy Objective's (NEO's) focus on long-term consumer interests in relation to price, quality, safety, reliability, and emissions reduction.
2. Should we have alternative objectives for our network performance reporting? If so, what objectives should be included?	Ergon Energy and Energex make no comment.

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<p>3. What are your views on our proposed priorities for network performance reporting? Are the proposed priorities appropriate for the applicable NSPs?</p>	<p>We support the inclusion of emissions reduction and export services as priorities in future network performance reporting. However, careful consideration is needed in developing approaches for emissions-related performance reporting to ensure the information is both meaningful and reflects areas where NSPs can genuinely influence. Providing clear explanations of NSPs' areas of influence in emissions outcomes would improve transparency and help stakeholders better interpret performance data. This additional context would also enhance the accessibility of the reports for a broader audience.</p> <p>Given the variation in jurisdictional emissions reduction targets, we recommend the AER consider how performance outcomes can be meaningfully compared across jurisdictions while avoiding misalignment or misrepresentation. A consistent framework that accounts for these differences will be essential.</p> <p>Historically, the development of new reporting measures has presented challenges—particularly in achieving consistency across the industry. To address this, we recommend further consultation with NSPs to support the development of standardised data collection methods and agreed approaches to both quantitative and qualitative measures.</p> <p>We also recognise that multiple parties may claim benefits from jurisdictional emissions reductions, depending on how performance is measured and suggest the AER consider how to clearly delineate contributions to avoid duplication or overstatement of impact.</p>
<p>4. Should we have alternative priorities for our network performance reporting? If so, what priorities should be included?</p>	<p>While the current priorities are broadly consistent with the NEO, Ergon Energy and Energex recommend the introduction of an additional priority focused on network</p>

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	<p>constraints and system load dynamics. This priority would address emerging challenges and opportunities associated with:</p> <ul style="list-style-type: none"> <li>• minimum system load (e.g., midday solar exports)</li> <li>• ratcheted maximum demand (e.g., electrification, data centres), and</li> <li>• bi-directional use of network assets (e.g., export/import dynamics)</li> </ul> <p>These factors are increasingly relevant to the efficient operation and planning of electricity networks and have direct implications for reliability, security of supply, and investment efficiency. However, the metrics used to report performance against this priority will require careful consideration to avoid mischaracterising performance.</p> <p>The proposed addition aligns closely with the NEO, particularly in relation to:</p> <ul style="list-style-type: none"> <li>• promoting efficient investment and operation</li> <li>• ensuring reliability and security of supply, and</li> <li>• supporting emissions reduction through effective integration of consumer energy resources.</li> </ul> <p>It also complements the AER's guidance on operationalising the amended NEO, which emphasises the importance of quantifying emissions impacts and enabling consumer energy resources.</p> <p>If not suitable as a standalone priority, this topic be incorporated as a reporting component under either:</p> <ul style="list-style-type: none"> <li>• Emerging Trends and Issues, or</li> </ul>



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	<ul style="list-style-type: none"> <li>Export services (for DNSPs) (noting some data relating broadly to this issue is captured but is not currently suitable to explore holistically).</li> </ul> <p>This would still allow for meaningful analysis and visibility without requiring a formal priority designation.</p>
Any other feedback not captured above	<p>We suggest that any proposed changes to reporting requirements be accompanied by a cost-benefit analysis. This would help ensure that any new data collection is proportionate to the value it provides. Such an approach would support targeted, efficient reporting and maintain stakeholder confidence in the relevance of the information collected.</p>