



Ref. A6003138

18 September 2025

Cameron Martin
Director, Network Expenditure
Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3001

Dear Cameron,

Preliminary 2025 Economic Benchmarking Results for Transmission Network Service Providers

Powerlink Queensland (Powerlink) appreciates the opportunity to provide feedback on the Australian Energy Regulator's (AER's) preliminary 2025 economic benchmarking results for electricity Transmission Network Service Providers (TNSPs). We note the information was prepared by Quantonomics, based on 2023/24 regulatory year data.

In the time available, we have not undertaken a comprehensive review of the report. Once we have had the opportunity to do so, we may provide further feedback to the AER. Notwithstanding this, we identified that there is misalignment between at least one reporting timeframe between the Quantonomics Report and the AER's Annual Information Order (AIO) – Electricity TNSPs. We recommend that the AER perform a wholesale cross-check between the AIO and the Quantonomics report to identify whether there are any further timeframe inconsistencies.

Reporting Timeframes for ENS Data

Powerlink's Energy Not Supplied (ENS) data for the 2023/24 regulatory year corresponds to calendar year 2023, consistent with our Economic Benchmarking Regulatory Information Notice Basis of Preparation. However, we understand that Quantonomics relied on calendar year 2024 ENS data.

Under the AIO, ENS data must be reported for the calendar year immediately preceding the reporting period (that is, calendar year 2024 for the 2024/25 period¹), using the data prepared as part of the annual Service Target Performance Incentive Scheme reports. From 2024/25 onwards, Powerlink recommends the AER align ENS reporting timeframes in its Annual Benchmarking Reports with its AIO requirement. While this means that calendar year 2024 ENS data would be used in both the 2023/24 and 2024/25 benchmarking periods, we consider it a reasonable transitional step to ensure reporting is consistent with the AIO and will help maintain comparability over time.

¹ AER AIO for Electricity TNSPs (April 2024), Appendix A – Data Workbook Instructions, pp13-14.



Benchmarking Specification Review

As noted in the AER's previous Annual Benchmarking Reports, we consider there is merit in a broader review of the transmission economic benchmarking specification to ensure the full range of TNSP services is captured in the context of the energy transformation. We also understand that other TNSPs have provided various feedback over recent years which may warrant further consideration in the context of the AER's benchmarking approach.

We encourage the AER to consider and advise when it intends to undertake its next benchmarking specification review, which presumably would occur prior to commencement of its next Network Information Requirements Review.

Please contact me if you have any questions in relation to our submission at [REDACTED]

Yours sincerely,

Signed by J Harris

Jennifer Harris
General Manager – Network Regulation