7 November 2025

Clare Savage
Chair
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

Provided by email: networkperformancereporting@aer.gov.au

Dear Ms Savage,

Re: Submission to the AER Consultation Paper – Network Performance Reporting for Regulated Electricity and Gas Networks

SA Power Networks welcomes the opportunity to respond to the Australian Energy Regulator's (AER's) consultation paper on Network Performance Reporting for Regulated Electricity and Gas Networks. As South Australia's sole electricity distribution network service provider (DNSP), we are committed to delivering safe, reliable, and sustainable electricity services to our customers while supporting the energy transition and the integration of customer energy resources (CER).

We recognise the critical role that transparent and effective network performance reporting plays in fostering accountability, improving stakeholder engagement, and driving better outcomes for consumers. Reporting must remain fit-for-purpose, particularly considering the evolving energy landscape and the increasing focus on decarbonisation and export services.

Our submission outlines recommendations to enhance the accessibility, relevance, and effectiveness of network performance reporting. These include:

- Streamlining reporting to improve usability and accessibility for stakeholders, including introducing Business Intelligence (BI) dashboards for enhanced data visualisation.
- Revising key metrics such as network utilisation and reliability to better reflect the impact of CER and the broader energy transition.
- Integrating export service reporting into the main network performance report to provide a more comprehensive view of network performance.
- Retaining existing objectives while recommending the explicit inclusion of the "energy transition" within the emerging trends priority.

On the AER's proposal to reduce the historical time series in network performance datasets, we consider that while a shorter time series may be appropriate for some datasets, a more flexible approach is required. Most network assets have economic lives extending well beyond 10 years, and a longer historical time series is often necessary to fully understand long-term network performance and investment outcomes. For these datasets, maintaining a broader historical view is critical to providing stakeholders with meaningful insights.

SA Power Networks is committed to collaborating with the AER and other stakeholders to ensure that network performance reporting continues to meet the needs of the sector and supports the long-term interests of consumers. We believe that the proposed enhancements will improve the accessibility and relevance of reporting, enabling stakeholders to better understand and respond to the challenges and opportunities of the energy transition.

We appreciate the opportunity to contribute to this important consultation and look forward to working with the AER to refine and implement these improvements.

Should you require further information or wish to discuss our submission in more detail, please do not hesitate to contact [redacted], [redacted] at [redacted] or on [redacted].

Yours sincerely

[redacted]

[redacted]

Accessibility of Network Performance Reporting

Noting that the current reporting framework was developed in 2020, we see opportunities to improve its accessibility and relevance for stakeholders, particularly as the energy transition continues to reshape the industry.

While it is important to include additional relevant content, such as insights related to the energy transition, we are mindful that the performance report has become lengthy and, in some areas, overly detailed. To enhance its usability, we recommend streamlining the report by reducing unnecessary content and focusing on the most critical and actionable information. Striking a balance between data-only reports and reports with analysis would also help cater to the diverse needs of stakeholders. These changes would make the report easier to consume and engage with, especially for those with limited time or technical expertise.

We also support the AER's proposal to incorporate Business Intelligence (BI) dashboards for enhanced data visualisation. Interactive dashboards would provide a more user-friendly and dynamic way for stakeholders to access and analyse key performance data. This approach would improve accessibility by allowing users to tailor their analysis to their specific needs and focus on the areas of greatest interest.

Analysis and Insights in Network Performance Reports

As mentioned above, a balance is needed between data-only reports and reports with analysis to ensure the report does not become overly cumbersome. While analysis and insights are valuable for stakeholders, excessive detail in the written report can detract from its usability and make it more difficult to identify key takeaways.

With the inclusion of a Business Intelligence (BI) dashboard, we recommend that the written performance report focus on highlighting key trends, insights, and actionable information. This would allow stakeholders to quickly understand the most critical aspects of network performance without being overwhelmed by excessive detail. For more granular or supplementary information, the report could refer stakeholders to the BI dashboard, which would provide a dynamic and user-friendly platform for exploring additional data.

This approach would ensure the written report remains concise and focused while leveraging the BI dashboard to provide stakeholders with the flexibility to access and analyse the data most relevant to their needs. By streamlining the written report and integrating interactive tools, the AER can enhance the overall accessibility and effectiveness of network performance reporting.

Contents of Network Performance Reports

We support the ongoing refinement of the contents of the network performance report to ensure it remains relevant and reflective of the evolving energy landscape. In particular, there is a need to revise key metrics such as energy delivered and network utilisation to better account for the growing impact of CER and the broader energy transition.

The increasing penetration of CER, including rooftop solar, batteries, and electric vehicles, is fundamentally changing how energy is generated, consumed, and exported across the network. Traditional measures of energy delivered, network utilisation and reliability may no longer fully capture the complexities of these changes, such as the impact of bidirectional energy flows, peak demand shifts, and the role of export services

We recommend that the AER work with stakeholders as part of a more fulsome review, to update these metrics to reflect the realities of a more decentralised and dynamic energy system – particularly given that there will likely be several different use-cases for these metrics (e.g. performance reporting, benchmarking, potential new incentives). With respect to performance reporting metrics, this could include:

- Incorporating measures of export energy and its contribution to network utilisation.
- Revising utilisation metrics to account for the capacity of the network to accommodate CER exports and manage peak demand.

By revising these key metrics, the network performance report can provide a more accurate and comprehensive view of network performance in the context of the energy transition. We would welcome the opportunity to collaborate with the AER and other stakeholders to ensure these updates are fit-for-purpose and aligned with the needs of the sector.

Network performance report datasets

The AER proposes to reduce the historical time series in the network performance datasets to include operational performance data from 2014 onwards. While we agree that this may be appropriate for some datasets, a more nuanced approach is required to ensure the reporting framework aligns with the nature of network investments and provides sufficient historical context for meaningful analysis.

Most network assets have economic lives that extend well beyond 10 years, and a longer historical time series is often necessary to fully understand a network's performance over time. For example, data related to long-term asset performance, reliability trends, and investment outcomes may require a broader historical view to capture the full lifecycle of assets and the impact of past decisions. Since this data is historical and does not require ongoing updates, maintaining a longer time series for these datasets may not impose a significant administrative burden.

At the same time, we recognise that for other datasets, particularly those focused on operational performance or emerging trends, a shorter time series may be sufficient to meet stakeholder needs while ensuring the datasets remain manageable and aligned with current priorities. For these datasets, the AER's proposal to limit the time series to data from 2014 onwards, with pre-2014 data stored in standalone, static workbooks, is a practical solution that balances accessibility with efficiency.

Noting this, it is also important to ensure that performance reporting highlights any relevant changes in short-term trends where these may be of interest to stakeholders. While a longer time series provides valuable historical context, identifying and drawing attention to recent shifts or emerging patterns in performance can help stakeholders better understand current challenges, opportunities, and the effectiveness of recent initiatives. This approach ensures that both long-term and short-term insights are captured, providing a more comprehensive and balanced view of network performance.

Integration of export service network performance reporting

We support integrating export service reporting within the broader network performance report, now that export services data is included and reported through the annual Regulatory Information Orders (RIO). Combining these reports will streamline the reporting process and provide stakeholders with a more comprehensive view of network performance in a single, consolidated document.

This integration will also offer valuable context regarding the impact of export services on other metrics reported within the network performance report, such as network utilisation, reliability, and operational efficiency. As export services, including CER like solar and batteries, continue to grow in significance, it is essential to understand how they interact with and influence broader network performance trends.

By incorporating export service reporting into the main network performance report, the AER can provide stakeholders with a clearer and more holistic understanding of the evolving energy landscape and the role of export services in supporting the energy transition.

Objectives and priorities for network performance reporting

Overall, we broadly support retaining the existing objectives, as they remain clear, fit-for-purpose, and aligned with the long-term interests of stakeholders. In particular, we support the objective to "Improve network data resources," as this is critical for enabling stakeholders to access accurate, reliable, and comparable information. The proposed introduction of Power BI dashboards to replace Microsoft Excel workbooks is a positive step forward.

We also support the proposed amendments to the priorities, especially the inclusion of those related to emission reduction targets and export services. To ensure a more comprehensive approach, we recommend explicitly incorporating the "energy transition" within the emerging trends and issues priority. The energy transition encompasses a broader scope than decarbonisation alone, addressing the structural, technological, and operational changes required to transform the energy system.

Additional thought is required to develop approaches for emissions-related performance reporting, ensuring that the information provided is both meaningful and focuses on areas where networks have a genuine influence. When actions contribute to emissions reduction targets through jurisdictional schemes, it is essential to include clear definitions and methodologies to ensure consistent reporting across all networks.