# Network performance reporting for regulated electricity and gas networks

## Final position on objectives and priorities for network performance reporting

**December 2025**

AUSTRALIAN ENERGY REGULATOR

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# 1 Overview

Our network performance reporting analyses the key outcomes and trends in the operational and financial performance of the 28 network service providers (NSPs) regulated by the AER under the National Electricity Objective (NEO) and National Gas Objective (NGO).

The main output of this reporting is our Electricity and gas network performance reports, the accompanying operational and financial performance datasets and the infographic which summarises the key information to stakeholders.

In addition to this report, in 2023 we commenced our annual Export services network performance report. This report and the accompanying dataset and infographics analyse the performance of electricity distribution networks in providing services for embedded generators, such as residential solar and batteries, to export into their networks.

In October 2025, we published our Network performance reporting for electricity and gas network service providers Consultation paper ("Consultation paper"). This Consultation paper sought stakeholder views on the effectiveness and timing of our network performance reporting and our objectives and priorities for network performance reporting. We received 12 submissions (11 written responses and one meeting discussion) in response to the Consultation paper.

This paper provides:

- the final objectives and priorities for network performance reporting alongside our responses and considerations of issues raised by stakeholders in their submissions.
- our immediate actions for our 2026 network performance reporting following stakeholder feedback in relation to the network performance reporting process.

The responses received by some stakeholders also highlighted potential new network performance reporting metrics, which could require additional analysis and insights included in our network performance reports and/or the network performance reporting datasets. This paper summarises stakeholders' responses on our current network performance reporting process and deliverables.

As we need to carefully consider this feedback, we have not yet reached a final view on all the changes we could make to our network reporting process. Therefore, in this paper, we are only providing our views on the immediate actions for our 2026 network performance reporting.

However, we plan to work with stakeholders in the second half of 2026 to discuss potential options for our network performance reporting in 2027 and future years.

## 1.1 Purpose of our network performance reporting

We regulate electricity and gas NSPs to deliver good long-term outcomes for consumers in respect to the

- price, quality, safety, reliability and security of supply of electricity and covered gas services

- the achievement of targets set by a participating jurisdiction for reducing Australia's greenhouse gas emissions or that are likely to contribute to reducing Australia's greenhouse gas emissions.

To support our role, under the national energy laws and rules, we may prepare and publish reports on financial or operational performance of network service providers (NSPs), including in relation to compliance with relevant standards and the profitability and efficiency of electricity and gas NSPs.[1] In addition, we must prepare and publish reports on the performance of electricity DNSPs in providing services for embedded generators, such as residential solar and batteries, to export into their networks.[2]

The reporting of the NSPs' performance is an important task in an incentive-based regulatory framework. Done effectively, reporting on the performance of the networks should assist stakeholders, including the AER, to:

- more comprehensively understand the overall performance of NSPs against our regulatory determinations
- obtain greater insights into the benefits consumers receive from the NSPs' services, to align with our role under the NEO and NGO
- form a better understanding of ultimate returns to investors in networks over time
- quantify the impact of NSP performance and/or regulatory decisions on ultimate returns
- evaluate the effectiveness of the regulatory framework and our decisions under it, and
- having regard to this information, make better regulatory decisions.

1 NEL, s.28V; NER, r.8.7.4; NGL, s.64; NGR, r.140.

2 NER, r.6.27A.

# 2 Stakeholder responses received to Consultation paper

In October 2025, we published our Consultation paper. This Consultation paper sought stakeholder views on the effectiveness and timing of our network performance reporting and our objectives and priorities for network performance reporting. This consultation was required under the NER rule 8.7.4(a) and NGR rule 140(1).

We received 12 submissions (11 written responses and one meeting discussion) from the following stakeholders in response to the Consultation paper:

- Consumer advocacy groups - Energy Consumers Australia (ECA) and Australian Council of Social Service (ACOSS), Justice and Equity Centre (JEC) and South Australian Council of Social Service (SACOSS)[3]
- Industry bodies - Energy Networks Australia (ENA) and National Electrical and Communications Association (NECA)
- NSPs - Ausgrid, Ergon Energy and Energex and SA Power Networks
- Energy retailers - EnergyAustralia
- Retailer/technology providers - Tesla
- Analyst and advisory firms - Institute for Energy Economics and Financial Analysis (IEEFA) and Nexa Advisory (Nexa)

All public submissions have been published on the AER website.

We thank all stakeholders who participated in this consultation. The breadth and quality of submissions demonstrate growing interest from stakeholders in network performance reporting. We look forward to continuing to work with stakeholders to ensure our network performance reporting provides the accurate, reliable and transparent information stakeholders need to effectively consider the performance of NSPs.

[3] This submission was based on a meeting between SACOSS and AER staff. There is no public submission for SACOSS available on the AER website.

# 3 Our final objectives and priorities for network performance reporting

Our final objectives and priorities for our network performance reporting have been developed based on the feedback provided by stakeholders to the Consultation paper.

We have largely maintained the objectives and priorities proposed in the Consultation paper, making only minor changes to:

- inform consideration of the effectiveness of the regulatory regime objective to reflect the need to achieve the NEO
- the emerging trends and issues priority to expressly reference the energy transition to net zero
- the emissions reduction targets priority to clarify that the priority would only apply to jurisdictional schemes set by the NSP's respective jurisdiction.

In this section we have provided stakeholder views on our proposed objectives and priorities, our response to the issues raised and the final objectives and priority to be addressed through the preparation of network performance reporting.

## 3.1 Stakeholder feedback on objectives and priorities

The stakeholder feedback on the objectives and priorities questions in the Consultation paper is detailed in Table 3-1.

**Table 3-1 Stakeholder feedback on objectives and priorities for network performance reporting**

| Question | Comments |
|---|---|
| 1. What are your views on our proposed objectives for network performance reporting? Are the proposed objectives appropriate for the applicable NSPs?<br>2. Should we have alternative objectives for our network performance reporting? If so, what objectives should be included? | **General support for proposed objectives**<br>• Stakeholders broadly supported the proposed objectives, noting alignment with the National Electricity Objective (NEO) and consumer interests.<br>• Ausgrid emphasised that successful implementation depends on the robustness of underlying data and methodologies.<br>• IEEFA called for clearer wording of Inform consideration of the effectiveness of the regulatory regime objective, particularly in relation to the phrase "Improve transparency and accountability over the effectiveness of the regulatory regime."<br>• EnergyAustralia emphasised aligning performance reporting with regulatory determinations to support stakeholder engagement. |
| 3. What are your views on our proposed priorities for network | **Emission reduction targets priority** |

| Question | Comments |
|---|---|
| performance reporting? Are the proposed priorities appropriate for the applicable NSPs?<br>4. Should we have alternative priorities for our network performance reporting? If so, what priorities should be included? | • While there was general support for prioritising emissions reduction, stakeholders expressed concerns about scope and implementation of the priority.<br>• JEC argued that the AER's proposal to limit reporting to "applicable jurisdictional schemes" was too narrow and should be expanded. They advocated for comprehensive emissions reporting across the NSP's operations. JEC also urged the AER to assess each NSPs' net zero transition plan and avoid approving expenditures that lock in future emissions without proper analysis.<br>• ENA (along with other individual NSPs) stressed the need for emissions reporting to reflect areas where networks have genuine influence, and consideration in developing approaches for reporting. They called for clearer articulation of NSPs' roles in emissions outcomes, a consistent framework that accounts for jurisdictional differences, and further consultation to standardise data collection. Additionally, they requested clear definitions and methodologies from the AER to ensure the information reported is consistent across the networks.<br>• IEEFA added that emissions reduction targets are particularly urgent for gas networks, which face declining demand due to electrification.<br>• Tesla recommended developing metrics to track how network investments support or hinder emissions abatement, such as avoided curtailment of renewables and electrification enablement.<br>• Nexa raised concerns that emissions reporting could be misused by DNSPs to justify unnecessary investments in network assets. They cited Ausgrid's recent Community Power Networks proposal, which included emissions reduction as a project benefit. Nexa argued that competitive markets are better positioned to deliver emissions benefits.<br>**Emerging trends and issues**<br>• SA Power Networks recommended explicitly incorporating the 'energy transition' within the emerging trends and issues priority. They noted the energy transition encompasses a broader scope than decarbonisation alone, addressing the structural, technological, and operational changes required to transform the energy system.<br>**Network constraints and load dynamics**<br>• Ergon and Energex proposed an additional priority area in relation to network constraints and system load dynamics. This priority would report on emerging challenges and opportunities associated with minimum system load, ratcheted maximum demand, and bi-directional use of networks asset. |

## 3.2 Our consideration of stakeholder feedback

In this section we have provided our response to the stakeholder feedback on the proposed objectives and priorities in the Consultation paper.

### 3.2.1 Response to feedback on proposed objectives

The stakeholder feedback provided broad support to the proposed objectives, noting their alignment with the NEO and NGO and consumer interests. The only change to the proposed objectives was in relation to the "Inform consideration of the effectiveness of the regulatory regime" objective.

#### Inform consideration of the effectiveness of the regulatory regime

IEEFA raised concerns in relation to the wording for the Inform consideration of the effectiveness of the regulatory regime objective and recommended making this objective clearer.

Having regard to this feedback, we note there could be ambiguity as to how our reporting achieves this objective and how effectiveness of the regulatory regime is determined. This objective is designed to provide information and insights to both the AER and stakeholders on our regulatory framework, our decisions under the framework and network performance under those decisions.

The purpose of this objective is not to provide commentary or assessments on the performance of the regulatory framework, but rather to provide insights to stakeholders to support their assessment of the effectiveness of the regulatory regime. The role of our network performance reporting is to effectively inform stakeholders and provide the information they need to make their own determination of the effectiveness of the regulatory framework. This objective is achieved through both the analysis and insights in our Electricity and gas network performance reports and operational and performance datasets which accompany the report.

To remove any ambiguity in relation to how effectiveness of the regulatory regime should be determined, we are modifying the objective to explicitly reference the achievement of the NEO. We believe this will provide more clarity to stakeholders on the purpose of this objective and what information and insights our network performance reporting will provide to stakeholders. This involves the following changes to the objective (in italics)

**Inform consideration of the effectiveness of the regulatory regime *in achieving the National Energy Objectives***

Provides us and stakeholders with insights into the regulatory framework, our decisions under the framework and network performance under those decisions.

This will allow all stakeholders to analyse these inputs and assess the effectiveness *of how the regulatory regime is achieving the National Energy Objectives.*

Other comments on the objectives for network performance reporting were provided by:

- Ausgrid who emphasised that achieving some of the objectives was dependent on the underlying approach, data and analysis in the performance reporting

- EnergyAustralia who noted that the performance reporting should align with the lines of inquiry leading into and following the regulatory determinations for each NSP

In our view, these comments provide feedback on the contents and analysis and insights in our network performance report, and not the whether the objectives and priorities:

- are clear and fit-for-purpose
- can provide the required information for stakeholders to consider the effectiveness of the regulatory framework for electricity and gas NSPs
- are adaptable, robust and flexible to allow our reporting to evolve alongside electricity and gas network sectors changing with the energy transition
- can adequately identify and inform stakeholders on emerging trends in the electricity and gas network sectors which may require a regulatory response
- can provide the information of interest to stakeholders for their analysis of NSP performance.

Due to this, these comments have been added to the stakeholder responses to the network reporting process.

### 3.2.2 Response to feedback on proposed priorities

Stakeholder feedback in relation to the proposed priorities was predominately in relation to the emissions reduction target priority and the emerging trends and issues priority. Based on this feedback we have made minor changes to each priority.

#### Emission reduction targets priority

The stakeholder feedback noted general support for the emission reduction targets to be included as a priority following the amendment to the NEO and NGO to incorporate emissions reduction into the national energy objective. However, stakeholders expressed differing views and concerns around its scope and how it would be implemented as a network performance reporting metric.

As noted in our Consultation paper, there is uncertainty in relation to how NSP performance can relate to current or future schemes or targets set by jurisdictions to reduce or contribute to reduce Australia's greenhouse gas emissions. Further, we also noted that we didn't believe any of the current operational or financial performance data reported by NSPs could be used to assess their performance in relation to emission reduction targets. In the stakeholder feedback, there was no suggestions made by stakeholders on how current operational and financial performance data could be used to assess NSP performance under the proposed priority.

Based on this stakeholder feedback, our current view is that there is no current operational or financial performance data that could be used to assess NSP performance under this priority. Therefore, it is likely that any future potential reporting under this priority would require new reporting requirements or obligations on NSPs.

In relation to future potential reporting, ENA's submission noted that reporting NSPs' performance under the emissions reduction target priority would need a consistent framework. They noted the framework would need to account for jurisdictional differences, as

well as have clear definitions and methodologies from the AER to ensure the information reported is consistent across NSPs. We agree with this view, as to ensure the performance data on emissions reduction targets is accurate, reliable and transparent there needs to consistent instructions and definitions used by NSPs to prepare and report the data. To prepare consistent instructions and definitions, we would consult with NSPs to ensure they reflected jurisdictional differences and differences between NSPs' reporting approaches and data systems.

In addition to consultation with NSPs, we expect any potential future reporting on emission reductions targets to require consultation with other stakeholders including industry and consumer groups. This consultation would ensure our performance data on emissions reductions targets was holistic and presented all relevant views.

In the final emissions reduction priority, we have made a minor change to clarify that the priority would only apply to jurisdictional schemes set by the NSP's respective jurisdiction. This involves the following changes to the priority (in italics).

**Emission reduction targets**

Reporting on the performance of NSPs to applicable jurisdictional schemes, where the NSP's performance is a relevant measurement to achieving the target set by the *NSP's respective* jurisdiction to reduce or likely to contribute to reducing Australia's greenhouse gas emissions.

In relation to other feedback provided by stakeholders in relation to the emissions reduction priority, we believe:

- Tesla's recommendation to develop metrics to track how network investments supported or hindered emission abatement relates to the contents of the network performance reports and therefore we have included these comments in the stakeholder responses to the network reporting process.
- The regulatory determination process to determine the efficient and prudent capex that an NSP requires in their regulatory period, should help to alleviate Nexa's concerns of emissions reporting being misused by DNSPs to justify unnecessary network assets investments.

### Emerging trends and issues priority

The feedback on the emerging trends and issues priority related to SA Power Networks' recommendation to explicitly incorporate the energy transition. We agree with this view, noting that expressly referencing the energy transition to net zero would provide greater clarity and detail on the reporting under this priority. This involves the following changes to the priority (in italics).

**Emerging trends and issues priority**

Reporting on emerging trends and issues for electricity and gas networks, including those relating to the *energy transition to net zero and* decarbonisation of the energy systems.

### Possible network constraints and load dynamics priority

Ergon and Energex proposed an additional priority area in relation to network constraints and system load dynamics. Their submission noted this priority would report on emerging challenges and opportunities associated with minimum system load, ratcheted maximum demand, and bi-directional use of networks assets.

In our view, NSP performance in relation to network constraints and load dynamics would be reported under the emerging trends and issues priority, and therefore a new priority is not necessary.

The emerging trends and issues priority is designed to be flexible and adaptable to report on emerging trends and issues of high interest to stakeholders. This is evident in our Consultation paper, which included two possible topics; the utilisation of electricity distribution networks and the uncertainty in relation to the pace of decline in gas demand, which could be reported under this priority. Due to this, the network constraints and load dynamics and other potential emerging issues that are of interest to stakeholders could be reported under the existing emerging trends and issues priority.

## 3.3 Final objectives and priorities for network performance reporting

In this section we have provided the final objectives and priorities to be addressed through the preparation of NSP performance reports as prescribed under the NER and NGR.[4]

### 3.3.1 Objectives for network performance reporting

The objectives we aim to advance in our network performance reporting are provided in Table 3-2. These objectives apply to both electricity and gas NSPs.

**Table 3-2 Objectives for network performance reporting**

| Objective | Details |
|---|---|
| **Provide an accessible information resource**  | Enables the AER to collect and report accurate and reliable information on the performance of NSPs. This information should:<br>• educate those stakeholders seeking to better understand network regulation.<br>• equip engaged stakeholders to more comprehensively understand and assess the overall performance of NSPs and regulatory outcomes. |
| **Improve transparency**  | Promotes transparency by reporting on the NSPs' expenditure, investment decisions and service levels allowing comparisons between NSPs and over time.<br>This will provide an insight into the NSPs' business practices and decision making. This will lead to better informed stakeholder participation in regulatory processes and enhance the effectiveness of the regulatory framework. |

[4] NER, r.8.7.4; NGR, r.140.

| Objective | Details |
|---|---|
| **Improve accountability**  | Enhances accountability through outcomes monitoring. Performance reports will allow stakeholders to see whether an NSP's actual expenditure is consistent with its forecast expenditure, and to review why differences may have occurred.<br>Performance reports will also review and compare the NSPs' service performance levels. |
| **Encourage improved performance**  | Enables comparisons between the NSPs' expenditure, revenues, and performance, in different regulatory years and jurisdictions.<br>This may encourage NSPs to adopt more efficient processes and promote technologies applied successfully by better performing NSPs. It may also provide NSPs with an incentive to increase service performance while maintaining efficient investment levels. |
| **Inform consideration of the effectiveness of the regulatory regime in achieving the National Energy Objectives**  | Provides us and stakeholders with insights into the regulatory framework, our decisions under the framework and network performance under those decisions.<br>This will allow all stakeholders to analyse these inputs and assess the effectiveness of how the regulatory regime is achieving the National Energy Objectives. |
| **Improve network data resources**  | Allows us to analyse and test our existing datasets. This will allow us to identify areas where data is not directly comparable between networks and improve our data accuracy.<br>Performance reporting will also allow us to identify opportunities to improve our data collection process over time. |

### 3.3.2 Priorities for network performance reporting

The priorities we seek to address in our network performance reporting are provided in Table 3-3. All priorities except for export services (which will only apply to electricity DNSPs), will apply to both electricity and gas NSPs.

### Table 3-3 Priorities for network performance reporting

| Priority | Details | Applicable NSPs |
|---|---|---|
| **Operational performance and network efficiency**  | Reporting on forecast and actual capital expenditure and operating expenditure, identifying reasons for differences between forecast and actual expenditures and NSPs' forecast and actual outputs. | Electricity and gas NSPs |
| **Financial performance**  | Reporting on the NSPs' profitability, comparing businesses within and across jurisdictions and regulatory control periods. | Electricity and gas NSPs |
| **Network service quality**  | Reporting on service standard levels or reliability metrics. | Electricity and gas NSPs |
| **Emerging trends and issues**  | Reporting on emerging trends and issues for electricity and gas networks, including those relating to the energy transition to net zero and decarbonisation of the energy systems. | Electricity and gas NSPs |
| **Emission reduction targets**  | Reporting on the performance of NSPs to applicable jurisdictional schemes, where the NSP's performance is a relevant measurement to achieving the target set by the NSP's respective jurisdiction to reduce or likely to contribute to reducing Australia's greenhouse gas emissions. | Electricity and gas NSPs |
| **Export services**  | Reporting on the performance of electricity DNSPs in providing services for embedded generators, such as solar and batteries, to export into their networks. | Electricity DNSPs |

# 4 Our future network performance reporting

Our Consultation paper asked stakeholder a number of questions on our network performance reporting process and the deliverables of our reporting. These questions sought feedback on our current network performance reporting process and deliverables and what improvements we could make to provide more timely and relevant information for stakeholders to assess NSP performance.

Stakeholders provided detailed feedback on our network performance reporting process and deliverables, which highlighted future potential new network data and work programs for our network performance reporting. This feedback differed across the stakeholders, reflecting the variety of stakeholders who use our network performance reporting to assess NSP performance.

In this paper, we are only providing the immediate actions for our 2026 network performance reporting and not the actions for our future network performance reporting. However, we will carefully review the feedback received and work with stakeholders in the second half of 2026 to consider the potential options for our network performance reporting in 2027 and future years.

## 4.1 Immediate actions for our 2026 network performance reporting

Based on the feedback provided by stakeholders, we are progressing the following actions for our 2026 network performance reporting.

| Action | Explanation |
|---|---|
| **Retain analysis and insights in network performance reports**  | We will be maintaining the analytical and insights in the network performance reports.<br>This action is based on the strong consensus amongst stakeholders for the analysis and insights in our network performance reports.<br>Stakeholders also unanimously opposed data-only reporting, with Ausgrid highlighting that the explanations from the analysis and insights provide a counterpoint to potential misleading claims of network performance. |
| **Retaining historical time series of operational performance data**  | We will not be reducing the time series of the operational performance data. Therefore, we continue to include the operational performance from 2006 to 2013 for electricity NSPs and 2011 to 2013 for gas NSPs in the operational performance datasets.<br>This action is based on limited support from stakeholders to limit the operational performance data from the 2014 regulatory year and some stakeholders highlighting that network assets have long economic lives and that retaining full historical data is essential for comprehensive analysis |

| Action | Explanation |
|---|---|
| **Improve reporting timeliness**  | In 2026, we plan to release the 2026 Electricity and gas network performance report earlier in the calendar year, targeting a June 2026 publication date.<br><br>The timeliness of the Electricity and gas network performance report was raised by stakeholders as a common area of improvement, with some noting that delays in publication decreases the relevance of the network performance data. |
| **Integrate Export services reporting into Electricity and gas network performance report**  | In 2026 our Electricity and gas network performance report will also report on the performance of electricity DNSPs in providing services for embedded generators, such as solar and batteries, to export into their networks.<br><br>Stakeholders largely supported integrating export service reporting into network performance reports, noting that export services were now considered core network functions rather than ancillary offerings. In their submission IEEFA emphasised that consumers now receive two distinct services: import and export services. |

## 4.2 Stakeholder feedback on our future network performance reporting

The stakeholder feedback on the network performance reporting process and deliverables questions in the Consultation paper is detailed in Table 4-1.

This feedback is detailed and covers the manner, form and contents of our reporting and how we should undertake network performance reporting in the future. The feedback also highlights both short and long term issues, with some suggested changes to our reporting (such as those relating to AEMC's Integrated Distribution System Planning rule change process) requiring external processes to be finalised, before any changes could be implemented.

In addition, some stakeholders highlighted new network data and work programs for our network performance reporting, which may require additional reporting requirements for NSPs. Although we are yet to reach a view on these suggestions, before we include new requirements for NSPs, we will undertake a regulatory process to ensure our reporting is efficient, effective and reliable for stakeholders. This typically includes completing a cost benefit analysis on any new potential data, to test whether the reporting benefits of the data outweigh the costs incurred by NSPs in preparing the data.

We plan to work with stakeholders in the second half of 2026 to discuss this feedback and the potential options for our future network performance reporting.

### Table 4-1 Stakeholder feedback on our future network performance reporting

| Question | Comments |
|---|---|
| **Accessibility of our network performance reporting**<br>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? | **Support for interactive dashboards**<br>• Several stakeholders expressed support for transitioning to interactive Power BI dashboards, noting they allowed stakeholders to undertake more detailed analysis of performance trends in performance data.<br>• The need for network performance data to continue to be reported in downloadable excel workbooks was highlighted by Ergon Energy and Energex and IEEFA. These stakeholders noted that publishing the data in excel workbooks was necessary for the data to be extracted for offline analysis.<br>**Timeliness of reports**<br>• The timeliness of the reports was raised by stakeholders as a common area of improvement. ECA and ACOSS proposed publishing future network performance reports earlier in the calendar year to incorporate the most recent network performance data.<br>**Recommendations for improvement and current barriers**<br>• Tesla recommended improving report accessibility through timely publication, interactivity and interpretability. They noted that clear narrative summaries that highlight key drivers, emerging issues, and outliers, would bridge the gap between content and practical insights. Further, Tesla highlighted that static PDF and spreadsheet formats are difficult to navigate and limit the ability of third parties outside the regulatory community to conduct meaningful analysis.<br>• Ergon Energy and Energex recommended the network performance reports include targeted commentary to help different stakeholder groups better understand the implications of reported performance.<br>• SA Power Networks supported streamlining the written report to focus on critical insights.<br>**Presentation of current network performance reports**<br>• Ergon Energy and Energex noted that the current network performance reports were effective in using visual elements, such as charts, graphs, and infographics to enhance clarity and engagement. Their submission also praised the use of direct, plain language to support stakeholder understanding and participation. |
| **Analysis and insights in network performance reports**<br>2. What are your views on the current analysis and insights in our electricity and gas network performance | **Strong consensus for analytical commentary**<br>• Stakeholders unanimously opposed data-only reporting, emphasising that analytical insights are essential for interpreting complex trends. These submissions noted that without context, network performance reports risked becoming mere compliance tools rather than meaningful decision-support resources.<br>• Ausgrid noted that network performance data had been used to make misleading claims, and the AER's explanations in the network performance reports provided a necessary counterpoint. |

| Question | Comments |
|---|---|
| reports? Does the analysis and insights provide relevant and valuable information for stakeholders to assess NSP performance?<br>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?<br>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? | • ENA noted the network performance report's analytical commentary is useful in helping stakeholders interpret complex financial and operational data and removing this commentary risked reducing the transparency and the usefulness of the reports.<br>• ENA supported the network performance report's role in analysing key trends but advised that reports should account for jurisdictional and environmental differences across networks, as these factors significantly influence performance outcomes<br>**Gaps in network price analysis**<br>• ECA and ACOSS provided a detailed critique, noting that current reports focus on network costs rather than prices, despite the NEO's emphasis on long-term consumer interests in pricing. They noted concerns with "cost per customer" metric, as it ignored volume-based cost recovery. ECA and ACOSS recommended providing clear explanations of price drivers and providing analysis on network costs per kWh/GJ, network tariffs and annual bill estimates.<br>• SACOSS noted that network customers pay a network cost, which includes transmission and jurisdictional costs. They noted that currently there is limited visibility or transparency on the jurisdictional portion of network costs, noting these costs were expected to rise due to the NSW REZ.<br>**Profitability reporting in dollar terms**<br>• IEEFA highlighted that current network profitability is only reported as percentage returns, and not actual dollar figures. They recommended annual reporting of absolute profits at the network level and quantifying the benefits received by consumers under incentive regulation.<br>**Outdated network model perspective**<br>• Ausgrid critiqued the focus on a one-directional distribution of electricity in the current network performance reporting. They noted this approach failed to reflect the modern role of DNSPs in enabling consumer energy resources (CER) and supporting the energy transition.<br>• Nexa emphasised a lack of transparency around planning and operational network data, including around CER hosting capacity, network congestion and export constraint locations.<br>**Under-utilisation of incentive schemes**<br>• Tesla proposed annual reporting on demand management incentive schemes. This proposal involved incorporating project details in the reporting, as well as expenditure and network deferrals achieved. Their submission also recommended a new "demand-management performance" indicator.<br>**Need for consumer-centric insights**<br>• Ergon Energy and Energex called for more granular, customer-level analysis to understand how different groups experience network |

| Question | Comments |
|---|---|
| | services. Their submission emphasised the importance of equity-focused insights, particularly regarding the impacts of electrification, CER integration, and tariff reform across sectors.<br>• SACOSS emphasised the importance of including more granular consumption data for customers at varying stages of CER adoption. They noted this information could support analysis of network costs across different consumer groups during the energy transition, particularly around inequity between CER and non-CER customers.<br>**Process and reporting requirements**<br>• ENA and Ergon Energy and Energex emphasised that any changes to reporting methodologies must be supported by thorough explanations, formal consultation, and a cost-benefit analysis. They noted that new requirements need to deliver more value to stakeholders, than the cost and effort to produce the network performance data.<br>• Ausgrid emphasised that achieving the some of the objectives was dependent on the underlying approach, data and analysis in the network performance reporting<br>**Alignment with regulatory determinations**<br>• EnergyAustralia noted that the performance reporting should align with the lines of inquiry leading into and following the regulatory determinations for each NSP. |
| **Contents of network performance reports**<br>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?<br>5. What are the emerging trends and issues that we could include in our future electricity and gas network | **Current data is effective but more information is needed to meet gaps in network data**<br>• A number of stakeholders including Ergon and Energex and Ausgrid agreed that operational and financial data in current reports provided a solid foundation for network data, noting that current data is useful for tracking expenditure, asset movements, and service reliability. However, several stakeholders highlighted that key gaps remain in our network performance data.<br>• Ausgrid suggested a review of the network performance reporting framework to ensure it remains fit-for-purpose, especially as DNSPs increasingly contribute system-wide economic value beyond traditional metrics like energy consumption. They noted that current network performance reports do not adequately recognise the role of NSPs in leading the energy transition.<br>**Network utilisation: A critical gap**<br>• There was unanimous support for improving network utilisation metrics. Stakeholders noted the current focus on non-coincident maximum demand over zone substation capacity was “informative but incomplete,” as it failed to reflect two-way energy flows, local constraints, and asset productivity across the full operating cycle. Tesla noted that the current network utilisation calculation approach was outdated in a decentralised, flexible grid.<br>• Stakeholders supported introducing new network utilisation metrics, with some suggesting using the utilisation measures proposed by the |

| Question | Comments |
|---|---|
| performance reports? What new information should we collect to assess NSP performance in the energy transition? | University of Technology Sydney (UTS), alongside the current network utilisation data. These submissions noted the UTS' utilisation measures would better support network planning, consider CER, and reduce stranded asset risk. ECA and ACOSS noted that these measures could be calculated at a zone substation level, with the AER reporting the proportion of substations above or below certain utilisation thresholds. |
| **6.** What information is no longer relevant in the assessment of NSP performance? Why is this information no longer relevant? | • Ausgrid expressed that new network utilisation metrics must be clearly explained and consistently interpreted, suggesting DNSPs start with a baseline index to track annual changes.<br>• IEEFA argued that customer self-consumption should be excluded from network utilisation metrics, as it reduces network constraints and disencumbered network capacity.<br>• ENA noted that measurements of ratcheted maximum demand as a standalone indicator are increasingly less reliable in an environment of increasing CER. They suggested including minimum demand may help better consider the bi-directional use of network assets and supported further exploration of metrics that supported bi-directional energy flows.<br>**Emerging trends: electrification, CER, and flexibility**<br>• Stakeholders called for reports to reflect emerging trends such as electrification of household gas appliances for heating and cooking and EV charging which will impact network demand and investment.<br>• Tesla, EnergyAustralia, and Nexa recommended detailed service-level metrics for CER and export services, including connection times, curtailment volumes, hosting capacity, and voltage quality.<br>• SA Power Networks supported a revision of the traditional network performance measures such as energy delivered, network utilisation and reliability to reflect the penetration of CER and how energy is generated, consumed and exported across the networks.<br>• Nexa and EnergyAustralia emphasised the need to identify opportunities for non-network solutions by utilising underutilised network capacity.<br>• Telsa recommended developing metrics to track how network investments supported or hindered emission abatement.<br>**Gas networks: declining demand and stranding risks**<br>• IEEFA encouraged more granular reporting on gas networks, given the expected decline in gas demand. They recommended analysis on customer disconnections, capital expenditure categorisation, pipeline network assets age by region, and differences between forecast and actual gas demand.<br>• Tesla noted that asset stranding and cross-subsidisation risks for gas networks should be addressed through reporting on gas demand and depreciation metrics.<br>**Connections performance: transparency and timeliness** |

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| | • NECA and Nexa raised concerns about performance in relation to network connections, and suggested metrics on connection timeframes (from enquiry to offer and offer to completion) for each connection type. NECA also recommended reporting on alternative control services such as safety advice and permit costs.<br>**Governance gaps**<br>• Nexa raised critical concerns about ring-fencing and waiver governance, citing issues in relation to enforcement, the reliance on self-reporting, and lack of independent audits. Nexa suggested clearer reporting obligations to ensure compliance and better consumer protection. |
| **Network performance report datasets**<br>7. 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?<br>8. 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?<br>**9.** What are your views on our current electricity and gas infographics? What changes or improvements | **Format and accessibility**<br>• IEEFA emphasised the importance of maintaining Excel-format workbooks, specifically recommending that workbooks include a visible worksheet with complete raw performance data. IEEFA cautioned that Power BI reporting may be less convenient for data extraction and analysis by stakeholders.<br>• SA Power Networks supported the introduction of Power BI dashboards to replace Microsoft Excel workbooks.<br>**Data quality and alignment**<br>• Ausgrid highlighted the need for operational and financial performance datasets to reflect the most current annual information orders submissions (including any resubmissions), to reduce the time taken reconciling and verifying data.<br>**Historical time series in operational performance data**<br>• Stakeholders were divided on the proposal to limit historical data to post-2014. ENA and IEEFA opposed the reduction, arguing that network assets have long economic lives and that retaining full historical data is essential for comprehensive analysis. They noted that updating historical data is not particularly burdensome and that pre-2014 data remains useful.<br>• Ausgrid expressed concerns over the shortened data series creating potential inconsistencies, especially given that Economic Benchmarking regulatory information notice (RIN) includes data from 2006, with requirements on DNSPs to possibly backcast data. They recommended either retaining the longer time series or providing a clear rationale for the change.<br>• Conversely, Ergon and Energex supported the reduction, citing benefits in have consistent operational and financial time series.<br>• SA Power Networks recommended a flexible approach, where longer time series are kept on datasets related to network assets, with shorter time series for some operational data.<br>**Infographics** |

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| could be made to the infographics? | • The infographics in the visual summaries were generally seen as valuable by stakeholders, with some calling for more detail. For example, Ausgrid noted that the profitability infographic could provide more detail to prevent incorrect interpretations of the profitability results.<br>• Stakeholders also recommended enhancing engagement through interactive visual summaries which provided more detail network performance data. |
| **Integration of export service network performance reporting**<br>10. 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? | **Support for integration**<br>• Stakeholders largely supported integrating export services reporting into network performance reports, noting they are now considered core network functions rather than ancillary offerings. Stakeholders noted the integration reflected the growing role of distributed energy resources and aligned with the broader energy transition. Ausgrid also noted, that as export services data is now captured in the Annual Information Orders, the integration was both logical and practical.<br>**Implementation of export service reporting into Electricity and gas network performance data**<br>• In relation to the integration of export service reporting, Ergon Energy and Energex stressed the need to clearly segment export service data from traditional operational and financial metrics. Ergon Energy and Energex also noted the AER should consider removing export services data that does not meaningfully inform performance outcomes from future Annual Information Orders.<br>• Ergon/Energex and Tesla highlighted the importance of consistency terminology and definitions across the DNSPs, particularly in relation to curtailment, dynamic export limits, and export tariff participation.<br>• Tesla proposed developing an Export service performance index for each DNSP, incorporating metrics such as export-limit coverage, customer participation in flexible export arrangements, and average realised export hosting capacity.<br>**Recognising export services in benchmarking reporting**<br>• Ausgrid argued that integration should include recognition of export services as measurable outputs within benchmarking productivity models. They noted this would represent the contribution of export services to overall network performance.<br>**Importance of export service reporting**<br>• IEEFA highlighted the rapid uptake of residential batteries in Australia, particularly with the increase in installations of larger systems which is creating significant excess capacity for grid export. They suggested that a growing share of households may end up utilising the grid more for export services than for traditional import services, highlighting the need for robust and integrated export service reporting. |

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| **Other feedback provided** | **Concerns about the consultation process**<br>• Nexa raised concerns about the three-week consultation period, suggesting it was insufficient for meaningful engagement on a complex topic.<br>**Overlap of consultation with IDSP rule change process**<br>• Nexa highlighted the overlap with the AEMC's Integrated Distribution System Planning (IDSP) rule change process, warning of potential duplication and misalignment. Nexa cautioned against making changes to the network reporting process before the rule change process was finalised.<br>• EnergyAustralia also strongly recommended deferring substantive changes to reporting and data collection until the IDSP rule change process was finalised. They noted this deferral would reduce regulatory burden and better align with the AEMC's preferred approach, which includes standardised planning transparency and a unified reporting guideline. |