



Ref. A6284524

11 May 2026

Ms Kami Kaur
Executive General Manager, Networks Regulation
Australian Energy Regulator
GPO Box 3131
CANBERRA ACT 2601

By email: networksinformation@aer.gov.au

Dear Kami

Draft Annual Information Orders 2026-28 Electricity Networks – Explanatory Statement

Powerlink Queensland (Powerlink) welcomes the opportunity to provide input to the Australian Energy Regulator's (AER's), Explanatory Statement – Draft Update to the Annual Information Orders (AIOs) 2026-28 – electricity networks, published in March 2026.

Powerlink has reviewed the AER's proposed changes to the Explanatory Statement, Workbooks and the Glossary, and notes the updates to address a number of the issues with the current AIOs. In addition, we provide the following feedback for consideration.

Document	Section	Feedback	Recommendation
Explanatory Statement	2.1.4 Overheads expenditure and 2.1.5 Non-network expenditure	The points noted by Energy Queensland relating to double counting of non-network overheads and non-network expenditure are also applicable to Powerlink.	That the same treatment proposed for Energy Queensland be applied to Powerlink.
Workbook Appendix A	2.16 Worksheet 3.6 Quality of service data, Table 3.6.2 Market Impact Component	Recommend inclusion of an additional clause after 2.16.4, identical to clause 2.24.3 under Section 2.24 (Table 7.9.4): <i>"Null is valid where the scheme does not apply to TNSP with no explanation required in the Basis of Preparation."</i>	For consistency, strongly recommend inclusion of this clause for Table 3.6.2.
AER Networks Glossary	"Version 2" page, Row 620 System Losses	System Losses has been removed from Appendix A (2.16 Worksheet 3.6). Recommend removing this glossary entry.	The definition mentions "as defined in the transmission STPIS". This is incorrect and may cause confusion. Remove glossary entry.

If you have any questions in relation to this submission, please contact me at .

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Yours sincerely,

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Jennifer Harris
General Manager, Network Regulation