

11 May 2026

Kami Kaur
Executive General Manager, Network Regulation
Australian Energy Regulator

Dear Ms Kaur,

Re: Annual Orders 2026-28 update

TasNetworks welcomes the opportunity to provide feedback on the Australian Energy Regulator's (AER) draft Annual Information Orders (**Orders**) for 2026-27 and 2027-28.

TasNetworks considers that the AER has effectively supported networks during the transition from Regulatory Information Notices (**RINs**) to the Orders. The changes to the 2026-27 and 2027-28 Orders proposed by the AER are appropriate and reflect the issues faced by networks. Additionally, TasNetworks appreciates any reduction in data requirements – for example, maintenance data, where the AER does not have strong uses cases for the data.

TasNetworks would like to note that non-network operating expenditure (**opex**) has historically also been included in the reported value for corporate overheads in table 2.1.2 standard control services opex by purpose. In the RINs, table 2.1.2 allowed networks to include a balancing item which TasNetworks used to net-off the double counted value of the non-network opex which is also considered to be a corporate overhead. In the Orders, the removal of the balancing item means that the total opex figure in table 2.1.2 is inclusive of non-network opex twice.

We would also like to acknowledge the proposed changes to Transmission sheet 8.8 Revenue Requirements and note that they are being considered by TasNetworks Pricing team directly in consultation with the AER's Pricing team.

We thank the AER for the opportunity to comment on the draft Orders. To discuss the views expressed in this submission please contact Sam Riewoldt, Senior Regulatory Analyst, at

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Yours faithfully

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Alex Burk
Leader Regulation