



Australian Government



AUSTRALIAN
ENERGY
REGULATOR

AER Decision

Annual Information Orders – Electricity 2026-28

June 2026

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AER decision - Annual information order - electricity	5 April 2024	17
AER decision - Annual information order - electricity 2026-28	30 June 2026	14

Contents

1	Executive summary.....	1
2	Annual information orders – 2026-28 Update.....	2
2.1	Outcomes.....	2
2.2	Issues raised in consultation	2
3	Annual information orders - Changes from 2026-28 draft Orders	7
3.1	New data requirements	7
3.2	Redundant information	8
3.3	Error correction/clarification.....	8
3.4	Data requirements.....	9
3.5	Other information updates	10
3.6	Power and Water Corporation	11

1 Executive summary

On 30 June 2026 the AER made the Annual Information Orders (2026-28 Orders) to apply to regulated electricity networks. This Decision accompanies the 2026-28 Orders. It sets out our positions on matters we have identified as relevant to achieving our long-term vision for how we collect, manage, and share information about regulated electricity networks.

The 2026-28 Orders supersede the Annual Information Orders made on 5 April 2024 (2024-28 Orders) and set out the annual reporting obligations for regulated electricity distribution networks, transmission networks, and interconnectors. The 2026-28 Orders were made by the AER using its information gathering powers under the National Electricity Law (NEL).

The 2026-28 Orders correct for issues and anomalies identified in the 2024-25 annual information submissions responding to the 2024-28 Orders. The 2026-28 Orders will reduce the volume and complexity of issues arising in future information reporting processes. Our proposed updates:

- clarify ambiguous requirements
- rectify information specification errors
- update definitions in the glossary
- address issues requiring an exemption from the 2024-28 Orders
- help streamline the reporting process by minimising the need for additional guidance.

The 2026-28 Orders will incrementally improve the AER's information requirements and help reduce regulatory burden by increasing the clarity of reporting obligations.

We have reviewed all issues raised in submissions on the draft 2026-28 Orders. This Decision sets out the outcomes of our review, discusses key issues raised in consultation, and highlights changes from the draft 2026-28 Orders. For issues relating to specific information requirements, we provide a response in our Issues Register, published with the 2026-28 Orders and have not included our detailed review in this Decision document.

We were encouraged by the engagement of regulated networks and other stakeholders throughout this process. We are grateful participants found the time to participate and raise issues with the objective of improving the Orders. Hearing from those affected by our work helps us make better decisions, provides greater transparency and predictability, and builds trust and confidence in the regulatory regime.

2 Annual Information Orders – 2026-28 Update

2.1 Outcomes

The 2026-28 Orders set out:

- The class of persons to whom the 2026-28 Orders apply:
 - *regulated transmission system operators*
 - *regulated distribution system operators* (excluding Power and Water Corporation)
 - *regulated interconnectors*

For each class we have used terms defined in the National Electricity Law or National Electricity Rules to limit the coverage to only those electricity networks we regulate.

- The reporting years for which the 2026-28 Orders apply – 2026-27 to 2027-28.
- The annual submission date – four months after the end of the regulatory year.
- Our reasons for issuing the 2026-28 Orders.
- Our data requirements, specified in section 3 of each 2026-28 Order, covering the data submission workbooks and the data submission workbook instructions.
- Our supporting information requirements:
 - additional information, specified in section 4
 - basis of preparation, specified in section 5
 - audit and assurance reports from independent assurance practitioners, specified in section 6
 - statutory declaration, specified in section 6.

This Decision sets out our considerations in making the 2026-28 Orders and explains material changes from our draft 2026-28 Orders. Where the 2026-28 Orders reflect the draft 2026-28 Orders, we refer to our previous explanatory statement and only provide a high-level summary of the outcomes in this Decision.

2.2 Issues raised in consultation

2.2.1 Centre for Smart Power and Energy Research

A submission from the Centre for Smart Power and Energy Research (CSPER) highlighted opportunities for the AER to improve its annual information orders.¹ CSPER noted the changes in the way networks operate, with a shift to increasing inverter-based resources, consumer energy resources, storage, export services, curtailment and flexible demand impacting how data collected by the AER can be interpreted.

¹ CSPER, From Data Collection to Decision: Enhancing Observability in the Annual Information Orders 2024-25 to 2027-28, Submission to the AER, 8 May 2026.

CSPER stressed the need for greater clarity around the context of the network performance outcomes being reported, to minimise the risk of changes in the operating environment being interpreted as changes in operational efficiency. Key issues noted by CSPER are set out in Table 2.1.

Table 2.1 Summary of CSPER submission

Issue	CSPER response	Suggested refinement
Clarity and consistency of reporting requirements	Supported. Clearer definitions and instructions improve the quality and comparability of reported data.	Continue refining definitions, validation rules, and Basis of Preparation requirements.
Standardised annual reporting	Supported. Standardisation is essential for comparability across distributors, TNSPs, and interconnectors.	Preserve standardised reporting while allowing targeted contextual fields where operating conditions materially affect interpretation.
Aggregated expenditure, asset, and performance data	Supported, but aggregation can reduce visibility of operational context.	Add metadata or explanatory fields to identify material drivers such as curtailment, export constraints, PF duty, temperature effects, and loading conditions.
Data used for benchmarking and regulatory assessment	Supported. However, benchmarking depends on whether reported data captures relevant system conditions.	Improve observability of condition-dependent factors so performance differences are not misread as efficiency differences.
Future information requirements	Supported. The 2026-28 update is an opportunity to prepare reporting frameworks for a more dynamic electricity system.	Consider a staged pathway toward condition-aware reporting, beginning with low-burden metadata and targeted fields.

The AER is addressing the issues raised by CSPER in a number of ways, including:

- improving transparency around existing metadata collected in the basis of preparation, by publishing the basis of preparations submitted for the 2024-25 reporting year, and in future years. The basis of preparation will provide some details relating to data quality, sources, and consistency with prior year reporting to assist with interpretation
- improving access to contextual information provided as part of the supporting information requirements set out in the Orders. The supporting information provides some contextual material, for example, in relation to expenditure drivers.

We have published this material on our website in relation to the 2024-25 reporting year and will include the material when we publish the 2025-26 responses to the Orders.

The 2026-28 Orders also continue refining glossary terms, data consistency and validation rules. Submissions from regulated networks as well as CSPER support these improvements, and the AER will continue to refine, and improve its information requirements in each iteration of Annual Information Orders.

There are other processes currently underway to help improve visibility of distribution networks' operational performance:

- an AEMC rule change to enhance distribution network planning and reporting.² The draft rule sets out a role for the AER to develop data reporting requirements (guidelines), that will result in information about the detailed operation of the networks being published by the networks
- a working group facilitated by the Department of Climate Change, Energy, the Environment and Water, which recommends the AER undertake a process to develop specific reporting requirements relating to the distribution system operator function of the distribution networks.³

The AER will commence any work arising from these processes when the outcomes are finalised, expected to be later in 2026. Consultation on data and reporting requirements will provide a pathway for CSPER to provide further detail on the contextual and other information it would like made available.

2.2.2 Submission date

Ergon Energy and Energex (referred to as EnergyQueensland) provided feedback on the timing of annual submissions and suggested that targeted timing relief for new information requirements would help them manage the transition to the 2026-28 Orders.

We also received feedback from Ausgrid, initially raising concerns relating to timing of annual submissions. It later advised a detailed review of the draft 2026-28 Orders meant it no longer expected it would need additional time to prepare its annual information submissions.

We have not amended the submission timing for the 2026-28 Orders. Responses to the 2026-28 Orders are due 4 months after the end of the reporting period, generally 31 October.⁴

However, we will consider requests for relief on timing for businesses that can explain how issues impacting them mean they are unlikely to meet all their reporting obligations within that four-month period. This is consistent with current practice. The AER has the power to exempt specific businesses, or a whole class of persons, that are subject to a 2026-28 Order from specified obligations under the 2026-28 Order. We will review and process any requests for exemption made by regulated networks, in accordance with our powers under the NEL⁵, including requests relating to timing relief for the submission of specific information.

In addition to the overall submission date, the AER has introduced a variation to the submission timing relating to protected information under the *Security of Critical*

² See AEMC website: <https://www.aemc.gov.au/rule-changes/enhancing-distribution-network-planning-reporting>

³ See DEECW, Final advice to Ministers to progress M3/P5 priority of the National CER Roadmap, available at <https://www.energy.gov.au/energy-and-climate-change-ministerial-council/working-groups/electricity-working-group/consumer-energy-resources-sub-working-group/redefining-roles-for-market-and-power-systems-operations>

⁴ AusNet Services Transmission provides its annual responses on 30 July, reflecting its regulatory years which end on 31 March each year.

⁵ National Electricity Law, section 28P.

Infrastructure Act 2018. If such information is required to be provided in response to a 2026-28 Order, we have included a requirement for the relevant regulated network to advise us of the protected information, one month prior to the submission date. This new requirement is discussed in detail in section 3.5.1 of this Decision.

2.2.3 Supporting examples and guidance material

EnergyQueensland requested the AER provide more guidance material to assist with interpretation of reporting requirements. Where we have identified specific issues, we have improved the clarity of requirements by updating the Appendix A - Instructions or addressing the concern in the Issues Register. We also consider our decision to publish the supporting material and basis of preparation submitted by each regulated network may help identify inconsistencies in the data and provide us with opportunity for future improvements. As new issues arise, we will work with the regulated network to understand the issues and if needed provide additional guidance to support their reporting. This is consistent with our current practice.

2.2.4 MED threshold assurance

EnergyQueensland raised concerns about the implied assurance requirement for the major event day threshold, noting the calculation of the threshold relies on 5 prior years of information that was collated outside of the Annual Information Orders reporting framework.

The required assurance standard (ASAE 3000 Assurance engagements other than audits or reviews of historical financial information) has been maintained as it is appropriate for non-financial information, such as the major event day threshold. However, we have clarified that the underlying data which is used to calculate the major event day threshold does not need to be included in the scope of the assurance procedure. We consider that as the information has already been scrutinised and accepted by the AER in its annual Service target performance incentive scheme review, additional assurance is not necessary. That information was also included in prior year assurance reviews, associated with regulatory information notices that were used to collect the data.

2.2.5 Accounting standards

The 2026-28 Orders set out a reporting framework for financial information that is based on the audited statutory accounts of a business.⁶ Differences in accounting treatments between regulatory accounts and statutory accounts are implemented through regulatory adjustments, which are reported on the income statement and operating expenditure disaggregation. Differences arise due to service classifications, and in some cases differences in accounting standards required in the regulatory framework, for example asset impairments are not included in the regulatory accounts.

The regulatory accounting principles and policies set out in the Appendix A - Instructions also require information to be reported in a way that allows for comparisons to be made over time. In circumstances where the accounting standards being applied to meet statutory reporting obligations change, and the change has a material effect on how financial information is

⁶ The reporting framework is not new in the 2026-28 Orders, it has been rolled over from the 2024-28 Orders, and prior to that underpinned the transmission regulatory accounts, Annual reporting, category analysis and economic benchmarking RINs.

classified and reported, there is a potential conflict between the overall reporting framework set out in section 1.2 of the Instructions and the regulatory accounting principles and policies set out in section 1.6 of the Instructions.

An example of this issue is the changes in accounting standards relating to the reporting of lease costs, and Software as a Service (SAAS) expenditures. The AER has requested additional information from regulated networks to address reporting issues and is working with regulated networks to ensure we get the information we need, for our specific functions and analysis. We also require information relating to regulatory adjustments to be provided (Section 4.3 of the 2026-28 Orders), which will help our understanding of the data being presented.

However, we will include this issue in our future work to refine the annual information requirements, and ensure all stakeholders have an opportunity to provide feedback on options to address the potential inconsistencies in the regulatory and statutory accounting frameworks.

2.2.6 Future work

Proposed process and timing 2028-32 Annual Information Orders

The AER continues to refine its information requirements, in response to changes in analytical tools, regulatory functions, and operating environments for regulated electricity networks. The Annual Information Orders provide a framework for driving consistency and efficiency in our information collections but are not the only tools used by the AER to collect necessary data or supporting information.

New data collections are often introduced via information requests where the scope of available information is explored, alternative information sources are identified, and the cost of information provision are considered. This work is continual and not dependent on the review cycle set for Annual Information Orders. However, as new information requirements are defined, we may integrate them into Annual Information Orders, to help improve the efficiency of the overall collection, and reduce the costs associated with stand-alone compilation and assurance obligations.

We will develop Annual Information Orders to apply in the 2028-29 to 2031-32 reporting years by 30 June 2028. The consultation process will commence by mid-2027 and will include new information collections developed by the AER in the period since the 2024-28 Orders were made.

3 Annual Information Orders - Changes from 2026-28 draft Orders

3.1 New data requirements

The following new data requirements as set out in the draft 2026-28 Orders have been retained without amendment:

- Interconnector cost allocation agreements
- Major event day threshold.

3.1.1 Transmission revenue reporting

In response to ongoing consultation with transmission networks and interconnectors, we have updated the new information requirements relating to transmission revenue reporting. The changes reflect the differing roles the co-ordinating network service providers have in comparison to other transmission network service providers.⁷ Amending the reporting requirements has provided clarity to the transmission networks and reflects their roles and obligations under the NER.

3.1.2 Non-network expenditure

We have amended the non-network expenditure requirements to collect disaggregated expenditure data, rather than only collecting direct non-network expenditures. This change requires direct and indirect or total expenditures to be reported. It has been made to address concerns about consistency in the data being reported by some networks, and consistency in the data across networks. Initial feedback from regulated networks indicated that they did not classify any expenditures as indirect non-network expenditures. However, the information provided as part of the 2024-25 data submissions has shown that is not the case for all businesses.

Disaggregating the expenditure data will improve our understanding of the data being reported. That increased understanding may lead to future amendments to our data requirements or reporting frameworks – if needed to minimise inconsistency in the current arrangements.

3.1.3 Overheads expenditure

We have introduced a new table for reporting capitalised corporate overheads. This table was included in the 2025-26 data submission workbooks but limited in its application to EnergyQueensland. It addressed an issue identified by EnergyQueensland whereby non-network indirect expenditures reported in Table 2.1.1 – Standard Control Services Capex by Purpose were double counted, against both the corporate overheads category and against specific activity categories (such as replacement capital expenditure, or ICT capital

⁷ A coordinating network service provider is the TNSP within a region of the national Electricity Market that is primarily responsible for calculating, coordinating, and publishing the combined transmission prices (such as Transmission Use of System, or TUOS, charges) for their entire region.

expenditure). Since the initial issue was raised relating to the 2024-25 responses to the Orders, other businesses have advised that they may face similar issues.

This additional table is not mandatory but must be completed if reporting in Table 2.1.1 allocates non-network overheads to activity specific capital expenditure categories, rather than only to the generic 'Corporate overheads' category. It will enable the AER to undertake detailed trend analysis in relation to overheads expenditures, as well as maintain its trend analysis for other capital expenditure categories.

3.2 Redundant information

The following redundant information requirements, as set out in the Explanatory Statement to the draft 2026-28 Orders⁸ have been removed from the 2026-28 Orders:

- Descriptor metrics for routine and non-routine maintenance (Table 2.8.1)
- Alternative control services – revenue grouping by chargeable quantity (Table 3.1.1) (Distribution Order).

In response to issues raised relating to reporting alternative control services revenues, we have also removed the requirement to report alternative control services revenues disaggregated by customer type or class, as set out in Table 3.1.2 – Revenue Grouping by Customer Type or Class, of the distribution Order.

We have reinstated the obligation to report system losses in Table 3.6.3 – System Losses. This information is being used by AEMO to support its analysis for its annual statement of opportunities and the AER also considers it may be able to use the data in future analysis associated with network utilisation. Given the current use of the data and potential use case by the AER we have retained the information requirement. This change will impact electricity distributors and transmission networks.

3.3 Error correction/clarification

The following information requirements have been corrected, consistent with the draft 2026-28 Orders:

- Large project capital expenditure
- Maximum demand – AusNet Services Transmission.

3.3.1 Transmission benchmarking asset base

The AER has identified an error in the transmission Order - data submission workbook relating to the benchmarking asset base. The data submission workbook issued for the draft 2026-28 Order incorrectly included a table heading 'Partially as incurred', relating to reporting benchmarking asset base values. The benchmarking asset base is required to be reported on an 'as-commissioned' basis, not partially as incurred basis.

We have corrected this error for the 2026-28 Order, in the data submission workbook, worksheet 3.3 Assets, Table 3.3.1 Regulatory asset base values – benchmarking asset

⁸ [AER, Explanatory statement, Draft update to Annual Information Orders 2026-28 – electricity networks, March 2026.](#)

base, Table 3.3.2 Asset value roll forward and Table 3.3.2A Asset value roll forward – group 3 assets.

3.3.2 Distribution feeder performance

We have provided clarification in the Appendix A – Instructions relating to the reporting obligation for distribution feeders – as set out in Table 3.6.8 Feeder performance.

EnergyQueensland raised issues relating to the different data elements (customer numbers, line length and maximum demand) in this table, and the impact changing feeder classification over the reporting period can have on presenting the information. We note the data is being collected to support our analysis of feeder performance and is required to reconcile with the network interruptions data being collected in Table 6.3.1 Sustained Interruptions to Supply. We have retained the reporting requirement but provided clarification in the Appendix A instructions relating to the different metrics set out in Table 3.6.8.

3.4 Data requirements

The data requirements are set out in appendix A of the 2026-28 Orders:

- data submission workbooks and
- data submission workbooks instructions.

3.4.1 Data submission workbooks

The 2026-28 data submission workbooks substantially reflect those published with the draft 2026-28 Orders. They have been updated to address changes in data requirements as set out in sections 3.1 to 3.3 of this Decision. Where issues relating to specific data requirements were raised in submissions we have responded to the issues, as set out in the Issues Register published with the 2026-28 Orders.

We have maintained the data validation rules in the data submission workbooks published with the 2026-28 Orders.

We have maintained the inclusion of data Checks and Totals in the data submission workbooks for the 2026-28 Orders. As set out in the draft 2026-28 Orders, we have updated the Appendix A - Instructions to allow “FALSE” Checks and Totals values to be retained in the data submission workbook, where the underlying cause of the difference in the related data is explained on the worksheet.

Where issues relating to specific data validation rules or Checks and Totals were raised in submissions, we have responded to the issues, as set out in the Issues Register published with the 2026-28 Orders.

3.4.2 Data submission workbook instructions

The Appendix A - Data Submission Workbook Instructions have been amended to align with the updated data requirements. Where issues relating to specific data reporting instructions were raised in submissions we have responded to the issues, as set out in the Issues Register published with the 2026-28 Orders.

3.5 Other information updates

3.5.1 Protected SOCI information

The *Security of Critical Infrastructure Act 2018* (SOCI Act) outlines the legal obligations of energy sector participants (amongst others) that own, operate or have direct interests in critical infrastructure assets. It identifies some information about critical infrastructure assets as protected information, as defined under the SOCI Act (protected SOCI information).

The AER has introduced a new obligation, requiring regulated networks to provide information about any *protected SOCI information* they intend to submit as part of their annual response to the 2026-28 Orders. A new section 2.3.3 has been inserted, requiring regulated networks to advise the AER, three months after the end of the reporting period, of their intention to include *protected SOCI information* in their annual information submission.

The information required is limited to:

- identifying each file containing *protected SOCI information*; and
- describing the type of information, within each file, that has been classified as *protected SOCI information*.

We are requesting this information to highlight the importance of the correct classification and identification of *protected SOCI information* to the regulated networks. Early consideration of this material is expected to reduce errors in classification and identification of the *protected SOCI information* submitted to the AER. It will also enable the AER to prepare its information management systems to ensure the information can be protected, in accordance with our obligations under the SOCI Act.

We do not expect this new reporting obligation to create a material burden on the regulated networks. This is because very few of the networks have identified *protected SOCI information* in their responses to Annual Information Orders or Notices, and the volume of *protected SOCI information* is limited to one or two data tables, in those instances where it has been identified.

3.5.2 Glossary updates

We published our Networks Data Glossary with the 2026-28 Orders. We have made amendments to the Glossary in response to issues raised – these changes are set out in the Issues Register and identified in the Glossary itself.

We note the Glossary is integral to, and necessary to interpret, the information requirements set out in the 2026-28 Orders. It also includes terms and definitions relevant to other information requirements applying to regulated networks and pipelines, including annual regulatory information notices for gas distribution and transmission pipelines, and regulatory information notices issued to support revenue and access arrangement determinations.

3.5.3 Supporting information requirements

Supporting information requirements are set out in section 4 of the 2026-28 Orders. This information includes details of drivers of material changes, compliance reporting, reconciliation of expenditure data, methodologies for some data requirements, incentive

scheme information, and other material that relates to the data requirements. Changes made to this supporting information have been addressed in the Issues Register.

3.5.4 Basis of preparation

We have retained the basis of preparation, including the obligation to provide information relating to changes from prior years, and details of policy references or approvals that support the reporting methodologies of the regulated networks. These details provide useful information about consistency of information being compiled by the regulated networks, and can be used in trend analysis, or other analytical tools used to assess performance outcomes of the networks.

We note the basis of preparation is also the tool for providing additional information that will assist the AER (and other stakeholders) interpret the data being reported. Publication of the submitted basis of preparation from each regulated network will also help drive quality improvements in the material, by enabling scrutiny of the material across the sector.

3.5.5 Assurance requirements

We have retained the assurance requirements, as set out in section 6 of the 2026-28 Orders. The assurance requirements are tailored to reflect the type of data (financial or non-financial), its inherent quality (actual or estimated) and our use case. We have addressed specific issues relating to assurance obligations in the Issues Register.

3.6 Power and Water Corporation

3.6.1 Annual Information Notice

Power and Water Corporation is not subject to the 2024-28 Order for electricity distributors, but is subject to an annual information notice, developed concurrently with the 2024-28 Orders.

On 30 June 2026 we revoked the current Power and Water 2024-28 Annual Information Notice and served Power and Water with a new annual information notice, for the 2026-28 reporting years. The amendments and updates to the distribution 2026-28 Order have been applied as relevant to the Power and Water 2026-28 Annual Information Notice.