



Every Queensland
community deserves
to be a liveable one

8 July 2026

Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601
aer inquiry@ aer.gov.au

Dear Sir/Madam,

RE: Feedback on the Australian Energy Regulator's Network Resilience Guidelines Consultation Paper

As the peak body representing Queensland's 77 councils, the Local Government Association of Queensland (LGAQ) welcomes the opportunity to provide feedback on the Australian Energy Regulator's (AER) Network Resilience Guidelines Consultation Paper (the consultation paper).

Overall, the LGAQ supports the development of the Network Resilience Guidelines and considers this a critical reform to better reflect evolving risk, reliability and community resilience outcomes.

Strengthening network resilience is essential not only for electricity reliability, but for safeguarding community safety, economic continuity, and vital for enabling disaster management efforts.

As outlined in the consultation paper, widespread and prolonged power outages have had significant impacts not only on electricity networks but on the communities they serve.

Local governments and Local Disaster Management Groups (LDMGs) are at the frontline of these impacts, managing disaster events throughout all phases of prevention, preparedness, response and recovery. Local governments also hold place-based knowledge of critical infrastructure, vulnerable populations, and recovery dynamics that is not otherwise captured in network investment planning.

This submission reflects long-standing policy positions adopted by Queensland councils and expressed through the LGAQ Policy Statement (**Attachment 1**) and a recent LGAQ Annual Conference resolution (**Attachment 2**).

The importance of resilient energy infrastructure is reflected in a resolution carried at the LGAQ 2025 Annual Conference, which calls on Federal and State governments to increase energy network resilience to improve reliable power supply for communities during disasters and severe weather events. This resolution highlights the critical role that reliable electricity plays in maintaining essential services, including water and wastewater treatment, telecommunications, health services, and emergency management functions.

From a local government perspective, enhanced power reliability reduces the impact of disasters on communities, as disruptions to electricity supply can:

- Compromise access to critical services and information.
- Delay emergency response and recovery efforts.
- Increase risks to public health and vulnerable populations.
- Reduce the effectiveness of community facilities that serve as key response and recovery hubs.

As the most disaster-prone state in Australia, Queensland is experiencing an increase in the frequency and severity of extreme weather events, with 74 out of the 77 Queensland councils and Weipa Town



Authority, activated for assistance under the joint Disaster Recovery Funding Arrangements (DRFA) during the 2024-25 season¹.

With disasters frequently disrupting power networks, the LGAQ supports the development of updated network resilience guidelines to drive increased network investment and improved regulatory frameworks that better reflect evolving risk, reliability and community resilience outcomes. Importantly, the effective implementation of these guidelines will require a clear and sustainable funding pathway to ensure timely and equitable delivery across jurisdictions.

While local governments play a limited direct role within the regulatory scope of this consultation paper and the proposed future guidelines, they are primarily responsible for managing events within their local government area². Under the Queensland Disaster Management Arrangements (QDMA), Queensland councils operate within a legislative framework unique to Queensland and are therefore significantly impacted by electricity network performance during disasters. Accordingly, this submission focuses primarily on issues of network resilience and impacts to community, and the importance of enhanced power reliability to enable quicker recovery efforts during times of disaster.

Network Resilience

With a resilient energy network, local governments can better support disaster coordination efforts, and as such, network resilience should be defined in a way that reflects the continuity of communications, and electricity supply to ensure the continuity of essential services and community functions during disaster events.

The support of Queensland councils for the 2025 LGAQ Annual Conference resolution calling for improved network resilience highlights that disruptions to power networks during events such as cyclones and severe storms have significant impacts on communities, particularly through the loss of access to critical services. Reliable electricity supply is essential to maintain:

- Water and wastewater treatment systems.
- Digital connectivity and communication.
- Health services and medical devices.
- Community facilities that support response and recovery, such as libraries and cultural centres.

In this context, the LGAQ considers that the definition of network resilience should focus on the ability of the network to:

- Minimise outages during severe weather events, particularly those caused by known vulnerabilities such as aboveground infrastructure.
- Maintain supply to critical infrastructure and community services during disruptions.
- Enable faster recovery of services, supporting disaster response and community wellbeing.

For remote communities, where connectivity challenges and infrastructure fragility are common, resilient energy networks are especially crucial. Reliable power enables continued access to digital connectivity solutions, such as satellite internet, which is vital for disseminating disaster updates and safety information. It also ensures the operation of essential services like water treatment and wastewater systems, preserving public health and safety during emergencies.

Cultural spaces also play an important role during response and recovery phases. Libraries, galleries, museums, and arts centres are often essential access points during and post disasters. Resilient energy and communication infrastructure means these vital facilities can stay open and support community recovery with information access, wellbeing programs, and other recovery support services.

¹ [Queensland Disaster Management Committee Annual Report 2024-25](#)

² [Disaster Management Act 2003 \(Qld\), Section 4A\(a\)\(d\)](#)



The 2025 Annual Conference Resolution referred to above also identifies specific infrastructure vulnerabilities and solutions that should be recognised within a practical understanding of resilience. In particular:

- Aboveground powerlines are highly exposed to wind, debris and flooding.
- Undergrounding powerlines can significantly reduce outage risk and improve service continuity.
- Vegetation management (e.g. tree clearances) plays an important role in reducing disruption.

Supporting investment in these measures can deliver long-term net benefits by reducing outage costs, improving reliability, and lowering recovery expenditure across governments and communities.

Local governments are the closest level of government to communities and are uniquely placed to understand what contributes to building stronger, more resilient communities through reducing vulnerabilities to enable a more efficient response to disasters. However, councils cannot do this alone. As the level of government that is funded the least – earning around three cents in every dollar of taxation revenue compared to 80 cents for the Federal Government and almost 17 cents for the State Government – councils cannot continue to absorb additional and increasing costs

It is therefore important that through the development of the guidelines, the AER considers a sustainable funding mechanism that avoids shifting any additional cost burdens onto local governments. Councils actively seek to understand the priorities for building resilience within their communities; work which is realised using strategic tools such as Local Resilience Action Plans (LRAPs)³ that align with broader strategies to provide a pathway to seek and secure resilience funding.

Funding mechanisms such as the Disaster Ready Fund (DRF), are essential for disaster resilience and risk reduction. With the Federal Government investing \$600 million into 452 projects across rounds one to three of DRF⁴, and with Round Four currently open to applications, reducing the exposure to risks and therefore the burden on local government and communities, is essential for whole-of-government commitment to disaster resilience.

This comes at a time when the future of disaster funding is uncertain, following the Federal Government's announcement of planned changes to the Disaster Recovery Funding Arrangements (DRFA). Limited details regarding the proposed new Disaster Recovery Funding Framework (DRFF)⁵ have been released, but Queensland councils hold grave concerns regarding some of the known changes, including the proposed reduction in the Federal Government's contribution to disaster recovery from an average of 64 per cent per disaster in Queensland to just 50 per cent. The proposed DRFF is likely to result in a significant decrease in disaster recovery funding following a disaster event, leaving Queensland councils and their communities exposed to significant cost-shifting.

Based on the above, the LGAQ makes the following five recommendations:

- **Recommendation 1:** The LGAQ recommends the AER adopts a definition of network resilience in the Network Resilience Guidelines that explicitly recognises the continuity of electricity supply to essential services and community infrastructure during disasters and severe weather events.
- **Recommendation 2:** The LGAQ recommends the AER ensures the Network Resilience Guidelines support investment in preventative resilience measures, including infrastructure upgrades that demonstrably reduce outage likelihood and duration, such as targeted undergrounding, strengthened overhead assets, and enhanced vegetation management.

³ [Local Resilience Action Plans \(LRAPs\) | Queensland Reconstruction Authority](#)

⁴ [Disaster Ready Fund | NEMA](#)

⁵ [Disaster Recovery Funding Framework \(DRFF\) | NEMA](#)



- **Recommendation 3:** The LGAQ recommends the AER requires network service providers to incorporate local government knowledge and community-level impacts into resilience planning and investment decision, including through structured and ongoing engagement with local governments as part of regulatory planning processes.
- **Recommendation 4:** The LGAQ recommends the AER prioritises regulatory settings that incentivise network businesses to invest in resilience, reduce the frequency and duration of outages and support faster restoration of services following extreme weather events.
- **Recommendation 5:** The LGAQ recommends the AER ensures the Network Resilience Guidelines explicitly recognise the need for sustainable and equitable funding arrangements for resilience investments and avoid any unintended cost shifting to local governments.
- **Recommendation 6:** The LGAQ recommends the AER supports the call of local governments for the Federal Government to abandon the proposed changes to the Disaster Recovery Funding Arrangements (DRFA) that would reduce Canberra's funding, due to the funding tension this could create for local government investment in resilience investments.

The LGAQ looks forward to reviewing the draft guidelines when published for consultation, following consideration of feedback received through council engagement and this submission.

Thank you for the opportunity to provide input. The LGAQ remains committed to working closely with the Australian Energy Regulator to support the delivery of reliable, high-quality electricity services for Queensland communities.

For further discussion, please contact Crystal Baker, Manager - Strategic Policy [REDACTED] or Robert Chow, Lead - Resources and Energy Policy [REDACTED]

Yours sincerely,

[REDACTED]

Alison Smith
CHIEF EXECUTIVE OFFICER



Attachment 1: LGAQ Policy Statement

The LGAQ Policy Statement² (2025) is a definitive statement of the collective voice of local government in Queensland. The relevant policy positions of local government in the context Australian Energy Regulator's Network Resilience Guidelines Consultation Paper are as follows:

8.7.3 Energy Use

- 8.7.3.1 Local government supports a whole of government approach to improving energy performance across all sectors and greater recognition of local governments' powers and capabilities in delivering improved energy use performance through access to appropriate programs and incentives.
- 8.7.3.2 Local government supports State Government provision of accessible and relevant information on energy use management.
- 8.7.3.3 Local government supports effective and consistent standards and regulations where necessary for cleaner and more efficient energy use management.
- 8.7.3.4 Local government supports whole of government support for regional implementation of energy use management initiatives including capacity building programs, incentives schemes, regional strategies for land use planning and transport.

8.8 Economic Development

- 8.8.10 Local government plays a vital role in supporting local businesses during natural disasters and economic downturns. Local government seeks funding, training, and resources to assist councils to build the economic resilience of their communities and to shorten the timeframes for economic recovery.

8.9 Regional Development

- 8.9.12 Regional Queensland underpins the State's economy through a diverse industry base including agriculture, resources and tourism and seeks to be supported by appropriate levels of service and infrastructure.



Attachment 2: LGAQ Annual Conference Resolutions

In the context of Australian Energy Regulator's Network Resilience Guidelines Consultation Paper, the following resolutions, passed by Queensland councils at previous LGAQ Annual Conferences, are relevant:

Resolution 62 (2025): Improved Energy Network Resilience

That the LGAQ calls on the State Government to increase energy network resilience to improve reliable power supply for communities during disasters and severe weather events.