NSW Reconstruction Authority

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15 October 2026

Executive General Manager Network Regulation
capex@aer.gov.au

Re: NSW Reconstruction Authority submission on Australian Energy Regulator Network Resilience Guidelines – Draft guidelines for consultation, September 2026

Dear Executive General Manager Network Regulation,

We appreciate your consideration of our earlier submission on the *Network Resilience Guidelines Consultation Paper, June 2026.*

Please find enclosed the NSW Reconstruction Authority's submission on the *Network Resilience Guidelines – Draft guidelines for consultation, September 2026* (the draft Network Resilience Guidelines).

RA welcomes the consideration the draft Network Resilience Guidelines bring to the future impacts of climate change on networks and local communities.

As previously stated, RA understands that completely eliminating the risk of power outages during and following disaster events is likely to be cost prohibitive, and the costs of risk reduction need to be managed in the context of overall issues of energy affordability and cost of living impacts. Our response to the draft Network Resilience Guidelines has been prepared with these considerations in mind.

RA's priority is the resilience of the NSW community and therefore our feedback on the draft Network Resilience Guidelines is focused on section 3.1.2 which sets out arrangements for 'Community resilience expenditure assessment' (pp.11-13), as follows:

State Disaster Mitigation Plan (SDMP) and Disaster Adaptation Plans (DAPs) as relevant independent findings recommending specific initiatives to support community resilience
• Under the NSW Reconstruction Authority Act and Regulations, essential service providers, such as Distribution Network Service Providers (DNSPs), are required to have regard to the NSW SDMP and DAPs in carrying out their functions. With reference to bullet point 2 (pp.11), we anticipate that under Principle 3 Prudency Assessment, DNSPs will be able to draw on the NSW SDMP and relevant DAPs as '… independent

findings/inquiries recommending specific initiatives to support community resilience…' where relevant. For the benefit of clarity, we recommend that this bullet point is amended to include '…findings/inquiries/*plans…*'.

Vulnerability assessments and DNSP roles in supporting community resilience

- RA welcomes the AER's recognition of the role of DNSPs in assisting communities to better prepare for severe weather events.
- RA's work on infrastructure resilience and economic disaster resilience in the preparation of DAPs has highlighted the criticality of energy networks in supporting community resilience, particularly in the context of supporting security of supply to critical services like telecommunications, emergency services, health facilities, transport systems and water supply and wastewater systems. In many instances, failure of these systems during disasters has been a consequence of power outages with significant indirect impacts for consumers and communities, including increased risk to life and property.
- RA appreciates the need to set boundaries of what DNSPs are responsible for, linked to the definition of a network service. RA's main priority is that the guidelines ensure that the AER has regard to the role of network upgrades in supporting broader community resilience, beyond general community liaison and preparedness activities.
- Specifically RA would recommend that bullet point 3 (pp.11) is amended to include the text in italics below, so that this bullet point reads 'Where there are interlinkages with other essential service providers (such as utilities, telecommunications, transport), documentation to demonstrate that the existing interplay between these providers is not providing sufficient assistance to the community, and reasons that the DNSP should be accountable for providing community assistance, *and where appropriate network upgrades to improve network resilience so as to improve community resilience*'.
- Via the NSW Joint Telco & Power Resilience Forum, RA is currently facilitating a process of collaboration between telecommunications carriers, BAI communications (Broadcast Australia) and the NSW TelcoAuthority (NSW public safety network operator), to conduct telecommunication power outage vulnerability assessments. This work has involved:
  - establishing data sharing agreements between each of the DNSPs and telecommunication organisations involved
  - reaching agreement on a telecommunication prioritisation framework to enable classification of the criticality of telecommunication assets across organisations (e.g. highest priority assets are hubs assets).

- exchange of telco asset data (including asset priority) and DNSP data on power outages linked to natural hazard events
- sharing of improvement and investment plans

This work is enabling telcos and DNSPs to collaborate to prioritise investment, including avoiding investing in sites that are already being improved by others. As this work progresses it is anticipated that sites will be identified where investment in network assets represents an efficient solution for preventing future telecommunications outages, particularly where this investment impacts sites where multiple carriers have high-priority assets.

It will be important that DNSPs are able to use the evidence provided by these collaborative vulnerability assessments to demonstrate the case for investment in network upgrades to enhance community resilience.

Community and stakeholder engagement in preparation of Disaster Adaptation Plans

- The NSW Reconstruction Authority undertakes community and stakeholder engagement in the preparation of DAPs. We anticipate that documentation that sets out community and stakeholder engagement undertaken in the DAP process and community and stakeholder perspectives on resilience investments to address power outages will be considered relevant evidence under bullet point 5 (pp.11-12).

Thank for the opportunity to provide this submission on the draft Network Resilience Guidelines. We look forward to seeing the final Guidelines when they are published in November 2026.

Sincerely,

Steve Hartley
Executive Director, Disaster Risk Reduction