

Network Information Requirements Review

Preliminary Annual Information Orders -
Explanatory statement

January 2023

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1 Introduction

This explanatory statement accompanies the preliminary Regulatory Information Orders (preliminary Orders) that compel electricity transmission and distribution networks to provide information to the AER. This explanatory statement describes our positions on matters that we have identified as relevant to achieving our long-term vision for how we collect, manage, and share information about regulated networks.

Publication of the preliminary Orders is a key milestone in the Networks Information Requirements Review (the review) being undertaken by the AER. The review helps ensure the information we collect from and about regulated electricity networks is robust, accessible, and fit for purpose into the future. The review is also about improving the quality of the information about regulated networks that we use and share.

Decision-makers and energy sector participants working for the long-term interests of consumers need consistent, relevant, and transparent information about regulated networks. It is critical to our ability to undertake our regulatory roles, including making revenue and price determinations and assessing and reporting on the performance of regulated networks. It underpins our analysis of regulatory proposals and supports the work of all stakeholders as they contribute to the future development of electricity networks and the energy sector.

The need for this review is driven both by the energy sector transformation and by recognition that our current information requirements and collection processes need to be refreshed.

1.1 Scope of the review

The review focuses on the information we collect from regulated electricity networks each year. Our annual information requirements support our assessment of regulatory proposals and our performance reporting functions. We use the data in our annual compliance and approval processes, including determination of service performance incentive rewards or penalties, annual pricing approvals, and demand management reports. We also use the information to review and refine our regulatory tools, to assess the impact of our decisions and to develop tools to analyse new areas of interest, such as the incentive arrangements relating to export services.

Our annual information collection is an important input to assessing expenditure forecasts and revenue proposals. Our review focusses on annual historical information, but it will be informed by changes in the regulatory assessment tools and models being developed and used in regulatory determination processes.

This review does not address changes to the data exchange IT systems and processes.¹

¹ See AER website *Future Technology Platforms Review*: <https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/future-technology-platforms>

1.2 Getting involved

On 23 March 2022, we initiated the review by publishing a Discussion Paper.² The Discussion Paper set out our initial positions on seven key areas and sought submissions from stakeholders. On 21 April 2022, we held a public forum so stakeholders could ask questions about the Network Information Requirements Review before submissions on the Discussion Paper closed on 6 May 2022. To address issues raised in the submissions relating to data requirements, we held a series of eight public workshops.³ All issues raised are addressed in Appendix C. To simplify presentation of the issues raised on the Discussion Paper, Appendix C is in two tables. Table C.1 sets out the issues frequently raised and our common responses. Table C.2 outlines the remaining issues individually with an AER response provided.

These preliminary Orders take into account responses to the AER's Discussion Paper, data requirements workshops and any other issues raised (see Appendix C).

The publication of the preliminary Orders marks the second stage of the review. We are now asking stakeholders to provide feedback on the preliminary Orders, and that feedback will be considered as we prepare the Draft Orders.

We aim to develop Draft Orders by June 2023 and finalise the Annual Information Orders by September 2023. All stakeholders can give us further feedback on the Draft Orders, prior to the AER finalising the Annual Information Orders.

We encourage engagement by all energy sector participants and stakeholders. The decisions we make and the actions we take affect a wide range of individuals, businesses, and organisations. 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.

Consultation

We are now seeking submissions from stakeholders on the issues raised in this paper and other issues relating to networks information requirements. Table 1 sets out the key milestones planned for the completion of this review.

² The Discussion Paper is available on the AER website:
https://www.aer.gov.au/system/files/AER%20-20Network%20Information%20Requirements%20Review%20-%20Discussion%20paper%20-%2023%20March%202022_1.pdf

³ Material relating to the workshops is available on the AER website:
<https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/networks-information-requirements-review/preparation>

Table 1.1 Key dates for Network Information Requirements Review

Milestone	Date
AER publishes Preliminary Draft Instrument (including data requirements)	25 January 2023
Consultation on the Preliminary Draft Instrument closes	31 March 2023
AER issues Draft Instrument	June 2023
Consultation on Draft Instrument	July 2023
AER issues Final Instrument	September 2023

1.3 Invitation for submissions

We invite energy consumers and other interested parties to make submissions on the Preliminary Annual Information Orders by Friday, 31 March 2023.

Submissions should be emailed: networksinformation@aer.gov.au

Alternatively, submissions may be sent to:

Dr Kris Funston
 Executive General Manager, Networks Regulation
 Australian Energy Regulator
 GPO Box 3131
 CANBERRA ACT 2601

We prefer that all submissions be publicly available to facilitate an informed and transparent consultative process. We will treat submissions as public documents unless otherwise requested. We will publish all non-confidential submissions on the AER's website. For further information on the AER's use and disclosure of information provided to it, see the [ACCC/AER Information Policy](#).

We request parties wishing to submit confidential information:

- clearly identify the information that is the subject of the confidentiality claim
- provide a non-confidential version of the submission in a form suitable for publication.

2 Discussion topics

2.1 Regulatory information instrument

The AER compels regulated electricity networks to provide information by serving regulatory information instruments on each business. Regulatory information instruments can only be served when the AER believes it is reasonably necessary to collect the information being requested. A regulatory information instrument will set out the type of information to be submitted by the regulated business and the reasons the AER requires the information, but it must also describe:

- the business or businesses on whom it is served (coverage)
- the period for which it applies (reporting period).

In this section we discuss the type of regulatory information instrument the AER intends to serve for annual information obligations, the coverage of the instrument and the period for which it applies.

2.1.1 Type of Instrument

AER preliminary view

The AER will develop regulatory information orders to specify the future annual information reporting obligations imposed on regulated networks. Separate information orders will be developed for the transmission and distribution networks.⁴

The AER currently uses a range of Regulatory Information Notices (RINs) issued to individual businesses, requiring them to submit information to the AER each year. In the Discussion Paper we put forward a preliminary view to change from issuing individual RINs to issuing Regulatory Information Orders (Orders) that would apply to all businesses in a defined ‘class’.

In the Discussion Paper we noted the benefits of consistency and administrative efficiency associated with issuing Orders rather than individual Notices (although the same information requirements can be specified in both). Our preliminary view was that we would develop Orders to specify the future annual information reporting obligations imposed on regulated networks and with separate Orders developed for the transmission and distribution networks.

2.1.1.1 Responses to the AER’s Discussion Paper

There was overall support for the consolidation of the existing suite of RINs and information requests into a single instrument.

Five parties responded to the issue of whether to move to a Regulatory Information Order in preference to RINs.⁵ There was broad support for the use of an Information Order, in the expectation it would help progress standardising requirements and broaden the consultation process. However, Powercor stressed the need to balance flexibility against the certainty

⁴ AER, *Networks Information Requirements Review – Discussion Paper*, March 2022, p 5.

⁵ Essential Energy, Victorian Department of Environment, Land, Water and Planning, Energy Safe Victoria, Jemena, Powercor (Citipower/Powercor/United Energy).

offered under an Information Order and cited business specific reporting requirements (such as the customer service incentive scheme).⁶ EnergyQueensland also raised concerns about the lack of flexibility associated with Orders, limiting the AER's ability to respond to unforeseen events that may impact a business' ability to meet the requirements of the Order. (See Appendix C for our responses to specific issues raised in the submissions on the Discussion Paper.)

2.1.1.2 Preliminary Orders

The AER has decided to develop Regulatory Information Orders. We have balanced the need for flexibility against the drive for consistency across the sector, the reduction in administrative burden, and increased transparency of the expanded consultation process.

We acknowledge the risk in reducing the flexibility with which we can amend the obligation imposed on a specific business. That flexibility has been used in circumstances where a business faces events that affect its ability to meet RIN requirements, and request changes to the relevant RINs to address those specific events. In section 2.1.4 we address options for providing flexibility within the framework of Orders.

We consider the need for flexibility should be minimal where the timing of the submission process is known well in advance and the information requirements are stable and well defined. In such circumstances the risks arising from issuing Orders should be low and able to be managed by the network businesses.

2.1.2 Class of persons - coverage

We serve Regulatory Information Orders on a 'class of persons' rather than individual businesses. That means any business that meets the definition of the class of persons described in an Order must comply with the Order. As such the Order applies uniformly across all existing participants and any future participants in the relevant class.

The AER's preliminary view was that it would develop separate Orders for distribution and transmission networks.

2.1.2.1 Responses to the AER's Discussion Paper

There was limited response on this issue. The Department of Environment, Land, Water and Planning (Victoria) (DELWP) commented that it did not think it was necessary to carve out any specific businesses from the Orders. However in the data workshops held by the AER, Power and Water Corporation raised a significant number of concerns about the data requirements that it was not able to meet. Participants also noted that regulated interconnectors, as a subset of transmission networks, currently have very different reporting obligations to other transmission networks.⁷

2.1.2.2 Preliminary Orders

We have developed preliminary Orders to cover the following three classes of participants:

⁶ TasNetworks raised similar concerns when it addressed the issue of future reviews and developing new information requests.

⁷ See Appendix C for our responses to issues raised in the submissions on the Discussion Paper.

1. Distribution:

Applies to the following specified class of *regulated network service providers*:

- *regulated distribution system operators* that own, control or operate a *distribution system* that is located in the Australian Capital Territory, New South Wales, Queensland, South Australia, Tasmania or Victoria.

2. Transmission:

Applies to the following specified class of *regulated network service providers*:

- *regulated transmission system operators* that own, control or operate a *transmission system* that is located in the Australian Capital Territory, New South Wales, Queensland, South Australia, Tasmania or Victoria.

For the avoidance of doubt, this preliminary Order does not apply to:

- *regulated interconnectors*; or
- AEMO.

3. Interconnectors:

Applies to the following specified class of *regulated network service providers*:

- *regulated interconnectors*.

For each class of participants we have used terms defined in the National Electricity Law or National Electricity Rules to limit the coverage to those businesses that we regulate.⁸

We have developed the Orders to recognise that different businesses supply different services or operate in different regulatory environments, meaning not all information requirements may be relevant to every business within a class of participants. For example, in the distribution class not all businesses provide public lighting services, and Tasmania categorises its network using different criteria to other states. The Orders accommodate such

⁸ NEL, Part 1 – Preliminary, 2 – Definitions:

regulated network service provider means—

- (a) a regulated distribution system operator; or
- (b) a regulated transmission system operator

regulated distribution system operator means an owner, controller or operator of a distribution system—

- (a) who is a Registered participant; and
- (b) whose revenue from, or prices that are charged for, the provision of electricity network services are regulated under a distribution determination

regulated transmission system operator means an owner, controller or operator of a transmission system—

- (a) who is a Registered participant; and
- (b) whose revenue from, or prices that are charged for, the provision of electricity network services are regulated under a transmission determination

NER, Chapter 10 – Glossary:

regulated interconnector

An interconnector which is referred to in clause 11.8.2 of the Rules and is subject to transmission service regulation and pricing arrangements in Chapter 6A.

issues, allowing businesses to explain why specific material is not relevant, or specifying the requirements in such a way that all variations are included.

We have separated interconnectors from the general transmission Order. Much of the data requirements related to transmission businesses are not relevant for interconnectors, including many of the metrics associated with benchmarking and detailed expenditure analysis. The Order for interconnectors clearly differentiates the interconnectors from other regulated transmission networks, although the information requirements that are included are consistent as possible with those applying to the transmission sector.

We have decided to exclude Power and Water Corporation from the Orders and instead define the annual reporting obligations for Power and Water Corporation under a separate RIN. Compared to other distribution networks in the national electricity market (NEM), Power and Water Corporation:

- is smaller in network size
- undertakes unique functions such as management of the technical code, market dispatch operations and transmission functions
- has community service obligations to remote communities
- is transitioning to NEM arrangements.

Our decision to exclude Power and Water from the Orders will be reviewed as part of an ongoing four yearly review cycle for the Orders (discussed in section 2.1.3).

2.1.3 Reporting period

AER preliminary view

An update of the AER's network information requirements should be scheduled for every 4 years, with informal collaborative processes used to address changing information requirements between reviews.

The reporting period refers to the years for which the Orders will apply and, following on from that, the length of time before the Orders are updated.

The AER will use the Orders to collect information each year where the information relates to the preceding regulatory year. All the regulated electricity networks are regulated on a financial year basis, and for all but AusNet Services Transmission their regulatory years end on 30 June. AusNet Services Transmission reports on a Singaporean financial year that ends on 31 March. The reporting periods correspond to the relevant financial years of each business, for the duration of the Order.

2.1.3.1 Responses to the AER's Discussion Paper

Of the 11 submissions on the issue, Energy Networks Australia, Energy Safe Victoria and DELWP generally supported the proposed fixed four-year cycle. Energy Queensland preferred a minimum review cycle of five years. Stakeholders also addressed the need to update information requirements outside the fixed review cycle, and generally supported a collaborative approach based around informal information requests, with some highlighting:

- minimising the need to back cast new data requirements

- timing of new requirements – including allowing sufficient time to build data systems to address new requirements
- constant changes increase the costs and complexity of meeting information requirements
- using formal consultative approaches to develop new requirements.

2.1.3.2 Preliminary Orders

The AER has implemented a four-year reporting cycle in the preliminary Orders. The four-year review cycle has been selected as it offers stability but does not allow the information requirements to stagnate. The preliminary Orders set out the following reporting periods for regulated networks:

- the financial year ending in 2024
- the financial year ending in 2025
- the financial year ending in 2026
- the financial year ending in 2027.

We will review and update the Orders on a four-year cycle, with new Orders needed for the financial year ending in 2028 and beyond.

The Orders create a reporting framework, and capture information upon which the AER relies in its decision making. As such, stability in information requirements is highly valued, supporting use of data across multiple periods for time series analysis, enabling us to understand patterns in behaviours and outcomes and identify anomalies in the information reported.

EnergyQueensland noted its preference for the annual reporting obligations to be at least five years. It noted the potential impact on costs of new information requirements being introduced within a regulatory period. It also raised concerns about the need to backcast historical information, in the context of reset processes, where historical data align with regulatory review periods.

A five-year review cycle will only address the concerns about the costs of information requirements and backcasting if the cycle aligns with a regulatory review. As the regulatory reviews are staggered over each five-year period, the suggestion by EnergyQueensland potentially disadvantages any businesses not aligned with the review cycle or requires the AER to move away from the proposed Orders that cover the sector and develop RINs specific to each network. That process would impose higher costs on the AER and other stakeholders that use data, requiring a continual cycle of developing annual information instruments. It is also unlikely to mitigate against the need to supply historical (backcast) data, where new data requirements are developed after a business specific Information Notice or Order is issued.

The AER is conscious of the cost of information provision. It is a factor explicitly considered when the AER serves a RIN or issues an Order. However, there will always be new data requirements. Changes to information requirements can be driven by internal factors including development of new analytical tools and models. Change can also be driven by external factors such as the energy sector transition, and the need to collect information to

enable us to analyse, understand and report on how regulated networks are responding to the transition. The information needs of stakeholders across the sector are another important consideration in formulating information requirements, where the information and insights we share underpin discussion of the future of the energy sector.

The four-year cycle balances the need to refresh information requirements against the benefits of stable reporting obligations. The four-year cycle also sits outside the regulatory review cycle for regulated networks and will therefore spread any benefits or costs driven by timing across all participants in the sector into the future.

2.1.4 Compliance and flexibility

2.1.4.1 Response to the AER's Discussion Paper

Stakeholders also raised the issue of compliance risk associated with Regulatory Information Orders. Of particular concern is the reduced flexibility inherent in Orders, whereby if a business cannot meet the requirements of the Order in a particular year there are fewer options available to address the specific issue, compared to the current RINs.

In 2021 we varied the obligations relating to the timing of RIN submissions for four regulated networks. In some cases the request to the AER to vary the RIN submissions date was made less than four weeks before submissions were due. These variations are examples of where flexibility has been used to enable regulated networks to meet RIN obligations. Without that flexibility, regulated networks were concerned they face increased risk of non-compliance with the Orders.

2.1.4.2 Preliminary Orders

The issues around flexibility and risk should be considered from the perspective of both the compliance framework associated with the Orders, and the AER's ability to respond to issues that may face an individual business in responding to the Orders.

Compliance framework

The Orders impose a legal obligation on businesses covered by the Order. Section 280 of the National Electricity Law requires the regulated networks to comply with a general Regulatory Information Order and classify breaches as a 'tier 1 civil penalty provision'. Tier 1 civil penalty provisions carry the most severe penalties for non-compliance, reflecting the importance of the obligations to the regulatory framework and operation of the national electricity market.

If a business does not comply with the Order, the AER has a range of options to address that non-compliance, including:

- Administrative resolution – accept a voluntary commitment from the network to address the non-compliance and undertake steps to minimise non-compliance in the future
- Issue guidance notes / compliance bulletins – the AER may want to publish education / guidance materials to clarify and inform expectations around non-compliance
- Issue an infringement notice – for a tier 1 civil penalty provision, a payment of \$67,800 (for body corporates) applies. Payment of an infringement notice does not constitute an

admission of a breach, but if a business chooses to make payment the AER cannot later bring proceedings in relation to that breach

- Depending on the nature / severity of the breach, the AER could also:
 - commence court proceedings to seek a declaration by the court of the breach and payment of a civil penalty amount or
 - accept a court enforceable undertaking (which is used to obtain commitments from the company to undertake steps to ensure the business has identified the cause of breach and mitigated the risk of future breaches, and/or other types of commitments which, for example, could relate to customer redress).

The AER uses the compliance and enforcement factors to consider the appropriate compliance outcome. These are set out in our compliance and enforcement policy.⁹

Amending Orders or obligations

To amend an Order the AER must follow the same process as it uses to develop Orders – that is, issue and consult on a draft amendment prior to issuing a final amendment.¹⁰ The consultation process is open to all stakeholders and we must allow a minimum of 30 business days for stakeholders to respond to our draft amendments.¹¹ We expect the process to amend an Annual Information Order to take a minimum of three months, depending on the complexity of the change.

However, while the AER is not able to quickly amend the Orders in response to specific issues raised by a business, it does have the power to exempt businesses from complying with an Order.¹² That power allows the AER to exempt an individual business (rather than just the class of person to whom the Order applies). In doing so the AER can limit the application of the exemption to specific obligations under the Order, as well as impose conditions. We cannot use these powers to vary the Orders, but they do provide us with an ability to address exceptional circumstances a regulated business may face from time to time.

For these reasons we do not consider a shift to Orders materially increases the risk of non-compliance faced by the regulated networks. As noted in section 2.1.1, the annual reporting process is not new, and the timing and extent of the obligations are well known. We consider the regulated networks should be able to manage those risks where the reporting obligations transfer to Regulatory Information Orders.

2.2 Data requirements

Data is at the core of the annual information requirements. We collect financial data covering regulated networks' revenues, expenditures, and asset base values, as well as non-financial

⁹ See AER Website:
<https://www.aer.gov.au/system/files/AER%20Compliance%20and%20Enforcement%20Policy%20July%202021.pdf>

¹⁰ Schedule 2 of the National Electricity Law, clause 20.

¹¹ Section 28H of the National Electricity Law; and clause 8.7.3 of the NER.

¹² Section 28P of the National Electricity Law allows the AER to exempt a person or class of persons from complying with a Regulatory Information Order.

data that describes the networks' outputs, operating environment, service performance and customers. The information informs our regulatory decisions, including decisions on forecast revenues, annual prices, and targets for service performance standards. The data is also used for performance reporting and informing analysis of the energy sector, by the AER and other industry stakeholders.

In this section we discuss how we structure and define our data requirements and summarise changes to the current data requirements. This work builds on responses to the Discussion Paper, and further discussion on issues undertaken at a series of data workshops held between July and September 2022.

2.2.1 Revised data requirements

AER preliminary view

Using our new data model, which groups like data into data categories, we will update our annual data requirements to:

- capture new data requirements
- eliminate duplication and redundant requirements
- standardise concepts and definitions
- document data validation rules
- enable crosschecking of data within data categories.

In the Discussion Paper we describe our new data model, which focuses on the type of data collected, rather than the type of regulatory information instrument or purposes for which we collect it. We published 'consultation workbooks' which transcribed the existing data requirements into the new data categories, and set out validation rules, definitions, and linkages between datasets. While some new data requirements were included, the bulk of the data in the consultation workbooks mirrored existing data collections, from both annual RINs, and ongoing informal information requests.

2.2.1.1 Response to the AER's Discussion Paper

All submissions to the Discussion Paper addressed the issue of data requirements. General themes relating to data requirements included:

- strong support for removing duplicate data
- strong support for removal of redundant data requirements
- a need for detailed use cases to be explained by the AER
- a need for clear mapping of data requirements to existing RIN worksheets and tables.

While there was recognition of the utility of grouping data by category, there was also concern about the use of the consultation workbooks as a future data collection tool, and the separation of related data concepts into multiple workbooks.

We provided information on the issues raised about specific data concepts, definitions, consolidation and use cases to inform our data requirements workshops. In addition, DELWP, Cadency Consulting, and Energy Safe Victoria wanted to see data relating to export services made available to all stakeholders. We provided this information as part of the supporting materials for workshop 8, noting we will incorporate outcomes our detailed engagement processes on export services into the distribution *Order*, but do not propose to

duplicate the other processes underway.¹³ QEUN raised concerns about the lack of information on demand management initiatives. We discussed these concerns at workshop 8, noting:

The data requirements do not include demand management expenditure and projects outside of the demand management allowance mechanism. The AER will work with NSPs to identify how demand management activity expenditure can be reported where it sits outside of any incentive scheme arrangement, but that information is most likely to be incorporated into future reset analysis.¹⁴

2.2.1.2 Preliminary Orders

The data requirements specified in section 3 of the Orders are set out in the workbooks attached at Appendix A to the Orders. Each workbook includes relevant definitions and overarching concepts that help define requirements.

We classify the data by ‘type of data’, grouping like concepts together, with an individual workbook created for each type of data:

- Operational outputs Information about the volume of activities and services delivered by the network.
- Network metrics Information about the configuration of the network and the environment in which it is located.
- Customer numbers Information about the network’s customer base.
- Service performance Information about how well the network delivers its services to consumers.
- Operating expenditure Information about expenditure used to operate or maintain the network.
- Capital expenditure Information about expenditure used to build or expand the network.
- Asset base values Information about the value of the assets of the network.
- Revenue and financial statements Information about revenues, financial transactions, and balances
- Prices Information about prices charged or paid by networks.

These workbooks specify data requirements - they are not intended to be used as a data collection tool for annual data submissions. That is, the process and tools to be used by

¹³ See <https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/networks-information-requirements-review/preparation#step-84231>. Workshop 8 – New data requirements – Export services.

¹⁴ See <https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/networks-information-requirements-review/preparation#step-84231>. Workshop 8 – DNSP Service performance and other information – AER response to issues raised – Discussion Paper.

regulated networks to submit data to the AER is to be developed separately to this process, which is focussed on the specification of data to be reported.

In response to issues raised we amended the workbooks and created a separate *Instructions* document to aid interpretation of the data requirements. The amendments include:

- removal of some data requirements
- inclusion of new data requirements particularly in relation to export services and safety incidents
- more detailed cross referencing to existing RIN tables
- reclassification of data relating to total expenditure to the revenue and financial statements category.

Changes in data requirements are set out in Appendix B.

We also amended some of the terms (names) used in specifying data requirements to clarify and clearly distinguish between similar but non-identical data requirements. For example, we renamed the asset base data collected for economic benchmarking from regulated asset base to benchmarking asset base. The derivation of the benchmarking asset base is different to the derivation of the regulated asset base used in the AER's revenue determinations and renaming the data series helps all data users recognise the two series are not the same and have different purposes. In renaming a data term we have not redefined the underlying data requirement, therefore the existing historical data series will align with future data collections.

2.3 Other information requirements

We require information, in addition to data, to help us understand the data being submitted. The information collected includes the basis of preparation, explanatory material, details of relevant policies, processes and methodologies, incentive scheme reports and some compliance information. We also collect information relating to data quality – independent assurance reports and declarations from company officers.

In the Discussion Paper we put forward the preliminary view that we would minimise non-data reporting requirements. In this section we discuss the basis of preparation and other changes to non-data requirements: assurance requirements are discussed section 2.3.2.

2.3.1 Basis of Preparation

The basis of preparation is critical to understanding how the regulated networks compile their data. We use it to understand the sources and methods they use and assess year on year movements in data against changes in data sources or methodologies. It is also critical to the independent assurance process. In that process the independent auditor assesses the data against the audit standards, RIN requirements and the basis of preparation before supplying an opinion or review report.

2.3.1.1 Response to the AER's Discussion Paper

Many network businesses supported the concept of a standardised basis of preparation, with the structure and form to be developed by the AER in conjunction with the regulated

networks. Options for a standardised basis of preparation were suggested by some businesses, reflecting the respective business’ current practice.¹⁵

There was widespread recognition that the basis of preparation is a critical element in the assurance processes, although the utility of the information to end users was questioned by some businesses.

2.3.1.2 Preliminary Orders

We have included a standardised basis of preparation in the Orders.

Standardisation will improve comparability, especially our ability to identify changes over time. A defined file structure for the basis of preparation will also help us use the information in the future. The current range of file types (PDF/Word/Excel) and tables structures within files limits searchability and comparability – and therefore overall usability. We consider increasing usability is likely to drive improvements in the quality of the information presented in future. The information required reflects the instructions in the Orders (section 5.2). These information requirements are consistent with current requirements, but now include reporting of NULL responses and explanations for NULL responses, and description of changes compared to the previous year’s basis of preparation.

The standardised basis of preparation is in the form of a table, which can easily be sorted and filtered using current systems and tools.

2.3.2 Assurance requirements

The historical data we collect using RINs is subject to independent assurance assessment (audit or review). Currently, the type of assurance assessment required depends on the type of data being assessed. The assurance requirements give us confidence the data we use to perform our regulatory functions is reliable and accurate, meets the requirements specified in a RIN and is supported by evidence or documented methodologies.

The following table sets out the basis for current (distribution) assurance requirements. The assurance standards applied reflect the type of data being assessed.

Table 2.1 Current assurance requirements

Type Quality	Financial data	Non-Financial data
Actual	ASA 805	ASAE 3000
Estimated	ASRE 2405	ASAE 3000

Where:

- ASA 805 - Special Considerations — Audits of Single Financial Statements and Specific Elements, Accounts or Items of a Financial Statement¹⁶

¹⁵ SA Power Networks, Ausnet Services.

¹⁶ https://www.augasb.gov.au/admin/file/content102/c3/ASA_805_2016.pdf

- ASRE 2405 - Review of Historical Financial Information Other than a Financial Report¹⁷
- ASAE 3000 - Assurance Engagements Other than Audits or Reviews of Historical Financial Information.¹⁸

For financial data, the key difference between ASA 805 and ASRE 2405 relates to the obligation on the auditor. Under ASA 805 the auditor is expressing an opinion on the financial statement, based on evaluation of the material against measurable criteria (in our case the RIN requirements). It represents a low-risk outcome, providing a 'reasonable' level of assurance. Under ASRE 2405 the auditor is stating whether or not anything has come to their attention which makes them believe the information under review is materially misstated. It represents a 'limited' level of assurance, and is based on procedures and evidence, but represents a higher risk than audit under ASA 805.

AER preliminary view

Information submitted to the AER must be endorsed by company officers and subject to review by independent audit or assurance providers.¹⁹

2.3.2.1 Response to the AER's Discussion Paper

All the network businesses who responded to the AER's preliminary view on this topic, supported ongoing assurance processes, acknowledging the importance of assurance to ensuring data integrity and compliance. However, the businesses also submitted the benefits from data assurance could be achieved in a more cost-effective and time-efficient way.

Several businesses raised issues on the costs involved in the current assurance process and how these costs are passed on to consumers and this was also raised by businesses who attended our data requirements workshops. A common theme was that the cost to regulated networks of auditing data sets is greater than the value of the audited data to the AER.

Alternative approaches to our current assurance process include aligning information assurance with the AER's use case and purpose for requesting the data. Other options presented focus on reducing the burden of the financial audit, either by relying on review standard engagements only (ASRE 2405), or in some cases eliminating the assurance requirement altogether.

Businesses were also concerned we would impose new assurance requirements where the current data submission is exempt from assurance. This applies where we have consolidated regular information requests (which do not require audit) into the Orders. For example, where a distribution business has materially changed its CAM since 2014, we currently request total opex data for benchmarking on a 2014 CAM basis, as well as current CAM basis. The 2014 CAM data is provided via an information request and is not subject to any assurance. By including it in the Order it will be captured as estimated financial data, and subject to assurance (ASRE 2405). Regulated networks responding to this issue in the Discussion

¹⁷ [https://www.auasb.gov.au/admin/file/content102/c3/ASRE_2405_21-8-08_\(ISSN\).pdf](https://www.auasb.gov.au/admin/file/content102/c3/ASRE_2405_21-8-08_(ISSN).pdf)

¹⁸ https://www.auasb.gov.au/admin/file/content102/c3/Jun14_Standard_on_Assurance_Engagements_ASAE_3000.pdf

¹⁹ AER, *Networks Information Requirements Review – Discussion Paper*, March 2022, p 11.

Paper argue the data should remain exempt from audit as an audit requirement on this data would impose a significant burden on the regulated networks providing this information.

2.3.2.2 Preliminary Orders

The preliminary Orders include independent assurance requirements that reflect our data use case and other factors, including the maturity of the data requirements, timing of data submissions and any existing independent scrutiny (for example from AEMO or jurisdictional regulators) that may apply to the data.

The implications of the change for the regulated networks are set out at Attachment A. For data where there is a limited current use case, or future use case we have opted for reducing the required assurance standard.

2.3.3 Other information requirements

In the Discussion Paper we stated we would reduce the non-data information requirements where possible.

2.3.3.1 Response to the AER's Discussion Paper

Most networks supported streamlining information requirements that are not data specific.²⁰ The concerns and options raised included:

- removing some requirements altogether (network maps, corporate structure, internal policy documents)
- submitting supporting information once, and thereafter only when material changes occur
- only submitting such information where the network business believes it is pertinent to understanding the data being presented.

2.3.3.2 Preliminary Orders

The preliminary Orders exclude the obligation to provide network maps, descriptions of corporate structure and internal policy documents. The Orders do require policy documents to be identified and changes in those documents to be reported.

²⁰ SAPN, EQL, Powercor, Jemena, AusNet Services, ENA, TasNetworks, Ausgrid.

3 Other matters

3.1 Transmission information guideline

Currently the transmission networks are required to submit information in accordance with an Information Guideline, most recently updated by the AER in April 2015.²¹ The NER require the AER to have the guideline in force, and it must include the manner, form and date by which the transmission networks should submit certified annual statements, and any other information required by the AER, to the AER.

Rule 6A.17.2 requires the AER to develop and publish the Information Guidelines and states the guidelines must apply from 28 September 2007.²²

3.1.1 AER preliminary view

In the Discussion Paper the AER put forward a view that the introduction of a consolidated information reporting framework would make the existing requirements under the Information Guidelines redundant. We proposed commencing a rule change process to remove the obligation to have an information guideline from the rules.

AER preliminary view

The AER will put forward a rule change proposal to remove the obligation to publish a transmission information guideline.

3.1.2 Responses to the Discussion Paper

None of the stakeholders responding to the Discussion Paper objected to the AER's preliminary view. Some participants actively supported the change noting the efficiencies inherent in the development of a single instrument.²³

In the workshops, stakeholders expressed a need for clarity on the applicable reporting framework applying in a given reporting year depending on the timing of the rule change. Both stakeholders and the AER want to avoid a situation where overlapping reporting obligations create uncertainty or increase the reporting burden unnecessarily. But the AER also wants to address the risk of creating a 'gap' in the timing of the reporting framework by removing existing obligation prior to new obligations taking effect.

3.1.3 Next steps

The AER will consult with stakeholders on a proposed rule change after we have reached the next milestone in the development of the new annual information Orders – that is, after we publish the draft Orders in June 2023.

Our preliminary thinking is to propose a rule change to delete rule 6A.17 and address any consequential amendments arising from the deletion of the rule. We will propose the rule

²¹ AER, *Final Electricity Network Service Provider Information Guideline, Version 2*, April 2015. <https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/information-guideline-2015/final-decision>

²² National Electricity Rules, Rule 6A.17.2(a) and 6A.17.2(c).

²³ Energy Networks Australia, Power and Water Corporation, TasNetworks, AusNet Services, Powerlink.

change to take effect from the date the final Orders are issued. Stakeholders are welcome to provide feedback during this consultation process, but we will run a separate process when we have more certainty over the contents and timing of the Orders (after the draft Orders are published).

3.2 Information exchange

The AER addressed the issue of information exchange in the Discussion Paper – but we explicitly excluded it from the process of developing information requirements.

We have maintained that position – the preliminary Orders do not mandate any specific technology or tool by which the regulated networks must provide information. We intend the Orders remain ‘technology neutral’ to allow for information exchange to keep pace with changing technological solutions, but also to allow all businesses (and the AER) time to transition to alternative technologies.

Most stakeholders addressed the issue of information exchange in their submissions to the Discussion Paper. There was strong support for improving how the AER shares information with all external stakeholders across the industry, as well as recognition of the benefits of a more streamlined process for submitting information to the AER. Critically several regulated networks raised the issue of being involved in the design of any new technologies, so that existing IT platforms, systems and capabilities can be accommodated to minimise costs of developing new technology solutions.

3.2.1 Next steps

The AER commenced a process for consultation on development of new technology solutions for information exchange in November 2022.²⁴ All stakeholders are welcome to monitor and participate in that process for the technological changes being managed by the AER.

²⁴ <https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/future-technology-platforms>

A Independent audit and review standards

Distribution

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
Revenues	Income statement	ASA805	ASRE2405	ASA805	ASRE2405	
	Jurisdictional scheme payments	ASA805	ASRE2405	ASA805	ASRE2405	
	Cross boundary expenditures	ASA805	ASRE2405	ASA805	ASRE2405	
	Demand Management	ASA805	ASRE2405	ASA805	ASRE2405	
	Provisions	ASA805	ASRE2405	ASA805	ASRE2405	
	Profitability - tax data	None	None	ASA805	ASRE2405	Data has been collected through information requests for a number of years and the series is well defined and stable.
	Revenue by chargeable quantity - SCS	ASA805	ASRE2405	ASA805	ASRE2405	
	Revenue by customer class	ASA805	ASRE2405	ASA805	ASRE2405	
	Revenue rewards and penalties	ASA805	ASRE2405	ASA805	ASRE2405	
	TUOS expenditure	ASA805	ASRE2405	ASA805	ASRE2405	
	Revenue by chargeable quantity - ACS	ASA805	ASRE2405			Derived data
	Public lighting revenue by tariff	ASA805	ASRE2405	ASA805	ASRE2405	
	Overheads expenditure (negotiated/Unregulated)	ASA805	ASRE2405	ASA805	ASRE2405	

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Unregulated revenue earned with shared assets	ASA805	ASRE2405	ASA805	ASRE2405	
Expenditures	Capex by purpose	ASA805	ASRE2405	ASA805	ASRE2405	
	Replacement capex	ASA805	ASRE2405	ASA805	ASRE2405	
	Connections capex	ASA805	ASRE2405	ASA805	ASRE2405	
	Augmentation capex	ASA805	ASRE2405	ASA805	ASRE2405	
	Non-network capex	ASA805	ASRE2405	ASA805	ASRE2405	
	Overheads expenditure	ASA805	ASRE2405	ASA805	ASRE2405	
	Labour / non-labour expenditure split	ASA805	ASRE2405	ASA805	ASRE2405	
	Capex by asset class	ASA805	ASRE2405	ASA805	ASRE2405	
	Capital contributions by type and asset class	ASA805	ASRE2405	ASA805	ASRE2405	
	Capital contributions by purpose	ASA805	ASRE2405	ASA805	ASRE2405	
	Metering capex	ASA805	ASRE2405	ASA805	ASRE2405	
	Fee and Quoted services capex	ASA805	ASRE2405	ASA805	ASRE2405	
	RIT capex			ASA805	ASRE2405	New data requirement, but well-defined concepts.
	Contingent project capex			ASA805	ASRE2405	New data requirement, but well-defined concepts

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Capex for provision of export services			ASRE2405	ASRE2405	New data requirement still being developed. Expect assurance standard to increase by next review.
	Opex by category	ASA805	ASRE2405	ASA805	ASRE2405	
	Opex by purpose	ASA805	ASRE2405	ASA805	ASRE2405	
	Vegetation management opex	ASA805	ASRE2405	ASRE2405	ASRE2405	Review standard aligns with indirect use
	Maintenance opex	ASA805	ASRE2405	-	-	Data not used in current form but future use being developed
	Emergency opex	ASA805	ASRE2405	ASA805	ASRE2405	
	Non-network opex	ASA805	ASRE2405	ASA805	ASRE2405	
	Metering opex	ASA805	ASRE2405	ASA805	ASRE2405	
	Fee and quoted services opex	ASA805	ASRE2405	ASA805	ASRE2405	
	Economic benchmarking categories	ASA805	ASRE2405	ASA805	ASRE2405	
	RIT opex			ASA805	ASRE2405	New data requirement, but well-defined concepts.
	Contingent project opex			ASA805	ASRE2405	New data requirement, but well-defined concepts.
	Opex for provision of export services			ASRE2405	ASRE2405	New data requirement still being developed. Expect assurance standard to increase by next review.
	Demand management	ASA805	ASRE2405	ASA805	ASRE2405	

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Overheads expenditure (negotiated/Unregulated)	ASA805	ASRE2405	ASA805	ASRE2405	
	GSL payments	ASA805	ASRE2405	ASA805	ASRE2405	
	Benchmarking opex – 2014 CAM					(Ad hoc information request not requiring assurance)
	Input tables	ASA805	ASRE2405	ASRE2405	ASRE2405	Review standard aligns with indirect use.
	Public lighting activities	ASA805	ASRE2405	ASA805	ASRE2405	
Asset base values	Benchmarking asset base – Total and by group – Network services	ASA805	ASRE2405	ASA805	ASRE2405	
	Benchmarking asset base – Total and by group – SCS and ACS	ASA805	ASRE2405	ASRE2405	ASRE2405	Review standard aligns with indirect use.
	Indicative RAB roll forward			ASA805	ASRE2405	New data: Indicative RAB and TAB - High value data, derived using well establish data concepts and methodology (RFM).
	Indicative TAB roll forward			ASA805	ASRE2405	New data: Indicative RAB and TAB - High value data, derived using well establish data concepts and methodology (RFM).
Prices	Average connection costs	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Public lighting unit costs	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
Network Metrics	Network assets – volume	ASAE3000	ASAE3000	ASAE3000	ASAE3000	

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Asset age profile	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Non-network assets – volume	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Network length	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Network capacity	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Network staff	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Network terrain factors	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Asset lives – network services	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Asset lives – SCS and ACS	ASAE3000	ASAE3000	-	-	Indirect use case
	Safety incidents			-	-	New data requirement, information subject to reconciliation with jurisdictional regulators
Operational outputs	Energy delivered by tariff	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Energy delivered received	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Energy Delivered – small business customers (tariff)					New data requirements
	Demand	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Connections	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Public lighting activities	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Metering activities	ASAE3000	ASAE3000	ASAE3000	ASAE3000	

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Fee based services and quoted services	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Asset replacement and maintenance activities	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Asset augmentation activities	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Motor vehicles	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Export services					New data requirements still being developed. Expect assurance standard to increase by next review.
Customers	Customers - distribution - economic benchmarking - STPIS - tariff	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Customers (Export services)			ASAE3000	ASAE3000	New data requirement, but high value data with well-defined concepts.
	Small business customers (tariff)					New data requirements
Service performance	Interruptions	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Call centre performance	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Complaints	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Instances where GSL not met	ASAE3000	ASAE3000	ASAE3000	ASAE3000	

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Instances where GSL not met – indicative data					Early submission of indicative data
	Energy not supplied	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Fire starts	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Inadequately served customers	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Other service measures	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Export services – complaints					New data requirements still being developed. Expect assurance standard to increase by next review
	Export services – overvoltage					New data requirements still being developed. Expect assurance standard to increase by next review
	Export services - capacity					New data requirements still being developed. Expect assurance standard to increase by next review

Transmission

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
Revenues	Income statement	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Provisions	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Profitability - tax data			ASA805	ASRE2405	Data has been collected through information requests for a number of years and the series is well defined and stable.
	Balance sheet items and Other			ASA805	ASRE2405	Actual revenues expected to be reported
	Revenue by chargeable quantity	ASA805	ASRE2405	ASA805	ASRE2405	
	Revenue by type of connected equipment	ASA805	ASRE2405	ASA805	ASRE2405	
	Revenue rewards and penalties	ASA805	ASRE2405	ASA805	ASRE2405	
	Related party transactions	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Price reduction/recovery	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Revenue reconciliation	-	-	ASA805	ASRE2405	New data requirement, but based on existing information request and concepts for transmission pricing processes

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
Expenditures	Capex by asset class – as commissioned	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Capex by asset class – as incurred	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Capex by purpose - Replacement capex - Connection project capex - Augmentation capex - Non-network capex	ASA805	ASRE2405	ASA805	ASRE2405	
	Augex - Lines	ASA805	ASRE2405	ASA805	ASRE2405	
	RIT capex	-	-	ASA805	ASRE2405	New data requirements with high value and well defined concepts
	Contingent project capex	-	-	ASA805	ASRE2405	New data requirements with high value and well defined concepts
	Income statement – expenditure	Regulatory audit	ASRE2405	ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Network overheads	ASA805	ASRE2405	ASA805	ASRE2405	
	Corporate overheads	ASA805	ASRE2405	ASA805	ASRE2405	
	Opex by category	ASA805	ASRE2405	ASA805	ASRE2405	
	Vegetation management opex	ASA805	ASRE2405	ASRE2405	ASRE2405	Aligns with use case

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Maintenance opex	ASA805	ASRE2405	ASRE2405	ASRE2405	Aligns with use case
	Non-network expenditure	ASA805	ASRE2405	ASA805	ASRE2405	
	RIT opex			ASA805	ASRE2405	New data requirements with high value and well defined concepts
	Contingent project opex			ASA805	ASRE2405	New data requirements with high value and well defined concepts
	Input tables (total expenditure)	ASA805	ASRE2405	ASRE2405	ASRE2405	Aligns with use case
Asset base values	Benchmarking asset base – Total and by asset category – as commissioned	ASA805	ASRE2405	ASA805	ASRE2405	
	Indicative RAB roll forward – partially as incurred and as commissioned			ASA805	ASRE2405	New data: Indicative RAB and TAB - High value data, derived using well establish data concepts and methodology (RFM).
	Indicative TAB roll forward – as commissioned			ASA805	ASRE2405	New data: Indicative RAB and TAB - High value data, derived using well establish data concepts and methodology (RFM).
Network Metrics	Network assets – volume	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Non-network assets – volume	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Network length	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Network capacity	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Network terrain	ASAE3000	ASAE3000	ASAE3000	ASAE3000	

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Age	ASAE3000	ASAE3000	-	-	Indirect use case
	Safety	ASAE3000	ASAE3000	-	-	New data requirement, information subject to reconciliation with jurisdictional regulators
Operational outputs	Energy delivered	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Energy not supplied	-	-	ASAE3000	ASAE3000	EB information request now incorporated to the formal reporting obligation
	Demand	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Connections	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Asset replacement activities	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Asset augmentation activities	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Motor vehicles	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	Unplanned vegetation events	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
Service performance – A	STPIS outcomes	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
	MIC monthly data	ASAE3000	ASAE3000	ASAE3000	ASAE3000	
Service performance B	STPIS inputs					
	- performance	-	-	-	-	

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	- exclusions	-	-	-	-	

Interconnectors

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
Revenues	Income statement	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Provisions	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Revenue rewards and penalties	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Related party transactions	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Price reduction/recovery	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Revenue reconciliation	Regulatory audit		ASA805	ASRE2405	New data requirement, but based on standard requirements for transmission pricing processes
Expenditures	Capex by asset class – as commissioned	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Capex by asset class – as incurred	Regulatory audit		ASA805	ASRE2405	New high value dataset, reflecting well understood financial concepts
	Capex by purpose - Replacement capex - Non-network capex	ASA805	ASRE2405	ASA805	ASRE2405	

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	RIT capex	-	-	ASA805	ASRE2405	New data requirements with high value and well defined concepts
	Contingent project capex	-	-	ASA805	ASRE2405	New data requirements with high value and well defined concepts
	Material projects capex	ASA805	ASRE2405	ASA805	ASRE2405	
	Income statement – expenditure	Regulatory audit		ASA805	ASRE2405	Assurance requirements aligned with other assurance requirements
	Vegetation management expenditure			ASRE2405	ASRE2405	Aligns with use case
	Maintenance opex	ASA805	ASRE2405			Aligns with use case
	Non-network expenditure	ASA805	ASRE2405	ASA805	ASRE2405	
	Network overheads			ASA805	ASRE2405	New data requirements for interconnectors with high value and well defined concepts
	Corporate overheads			ASA805	ASRE2405	New data requirements for interconnectors with high value and well defined concepts
	Opex by category			ASRE2405	ASRE2405	New data requirements for interconnectors with high value and well defined concepts
	RIT opex			ASA805	ASRE2405	New data requirements with high value and well defined concepts
	Contingent project opex			ASA805	ASRE2405	New data requirements with high value and well defined concepts

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
Asset base values	Indicative RAB roll forward – partially as incurred and as commissioned			ASA805	ASRE2405	New data: Indicative RAB and TAB - High value data, derived using well establish data concepts and methodology (RFM).
	Indicative TAB roll forward – as commissioned			ASA805	ASRE2405	New data: Indicative RAB and TAB - High value data, derived using well establish data concepts and methodology (RFM).
Network Metrics	Network assets – volume	Regulatory audit		ASAE3000	ASAE3000	New data requirements for interconnectors with high value and well defined concepts
	Network length			ASAE3000	ASAE3000	New data requirements for interconnectors with high value and well defined concepts
	Network capacity			ASAE3000	ASAE3000	New data requirements for interconnectors with high value and well defined concepts
	Safety incidents			-	-	New data requirement, information subject to reconciliation with jurisdictional regulators
Operational outputs	Connection projects			ASAE3000	ASAE3000	New data requirements for interconnectors with high value and well defined concepts
	Asset replacement activities			ASAE3000	ASAE3000	New data requirements for interconnectors with high value and well defined concepts

Preliminary Annual Information Orders – Explanatory statement

Type of data	Data tables	Current Audit/Review standard		New Audit/Review standard		Reason for change
		Actual	Estimated	Actual	Estimated	
	Asset augmentation activities			ASAE3000	ASAE3000	New data requirements for interconnectors with high value and well defined concepts
Service performance – A	STPIS outcomes			ASAE3000	ASAE3000	Aligns with use case
	MIC monthly data			ASAE3000	ASAE3000	Aligns with use case
Service performance B	STPIS inputs					
	- performance	-	-	-	-	
	- exclusions	-	-	-	-	

B Changes to data requirements

Distribution

Table name (RIN reference)	Change made	Rationale
Data Workbook 02: Operational Outputs		
Energy delivered by customer type (EB3.4.1.4)	Table added	Table was unintentionally omitted from the consultation workbooks.
Energy delivered - small business customers	Table added	New data - Category will be used for pricing and performance analysis.
Asset replacement and maintenance activities (previously named Asset replacement activities) (CA2.8.1 & CA2.2.1)	'Assets maintained' column added 'Assets Inspected' column added	Network maintenance activities are now incorporated into Asset replacement activities.
Network maintenance activities (CA2.8.2)	Table replaced	Network maintenance activities are now incorporated into Asset replacement activities
Asset augmentation activities – Lines (CA2.3.2)	Table expanded	Full table requirements were unintentionally omitted from the consultation workbooks.
Safety related activity	Table moved	Data included in Workbook 03.
Major event related activity	Table removed	Data not required.
Export services <ul style="list-style-type: none"> Export volumes – net metered volume of energy exported Exporting customer capacity by customer type Exporting customer capacity by feeder classification 	Tables added	Reflects data being requested and consulted on as part of the review into incentivising and measuring export services.
Data Workbook 03: Network metrics		
Terrain Factors – Maintenance Spans (length data) (EB3.7.3)	Table added	Table was unintentionally omitted from the consultation workbooks.
Asset Age profile – Economic life (CA5.2.1)	Table removed	Data not required.
Average Age of Asset Group (CA2.8.1)	Table replaced	Table replaced by a more concise collection of asset maintenance and inspection cycle data, aligned with asset categories used to report asset replacements and asset age.
Average Staffing Levels (CA2.11.1)	Table removed	Data not required.
Average Staffing Levels - Descriptor Metrics (CA2.11.2)	Table removed	Data not required.
Safety incidents	Table added	Data required to support new performance reporting analysis.
Data Workbook 04: Customer numbers		
Total Customers – Customers (distribution services) by NMI status	Table added	New data - Reconciliation of disaggregated customer data.
Customers (Economic Benchmarking)	Column added 'as at 1 July'	We can calculate average customer numbers data (for use in STPIS) from the end of period data for concurrent years. Allowing businesses the option to restate the Reporting

Table name (RIN reference)	Change made	Rationale
		Year-1 customer numbers will overcome issues arising from instances where the beginning of year STPIS customer definition does not match the end of year STPIS customer definition.
Customers (DRMG) by feeder	Metered / Unmetered split removed	Data not required.
Customers (DRMG) by feeder	Column added 'as at 1 July'	We can calculate average customer numbers data from the end of period data for concurrent years. Allowing businesses the option to restate the Reporting Year-1 customer numbers will overcome issues arising from instances where the beginning of year customer definition does not match the end of year customer definition.
Customers (Export services) numbers	Tables added	Reflects data being requested and consulted on as part of the review into incentivising and measuring export services.
Data Workbook 05: Service performance		
Interruptions to supply	'Restoration stage' column added	This column has been added to capture information where an interruption is restored in multiple stages.
SMS notification (AR6.10.1)	Table removed	Customer Service Incentive Scheme data requirements will not be included in the Order but instead in a RIN for the relevant DNSPs.
Customer survey outcomes (AR6.11.1-7)	Table removed	Customer Service Incentive Scheme data requirements will not be included in the Order but instead in a RIN for the relevant DNSPs.
System losses (EB3.6.3)	Table removed	Data can be calculated from EB RIN tables and is a duplicate requirement.
Export services <ul style="list-style-type: none"> Complains relating to export services Customers receiving overvoltage Customers requesting export capacity Export capacity requested Export service – approved capacity 	Tables added	Reflects data being requested and consulted on as part of the review into incentivising and measuring export services.
Data Workbook 06: Operational expenditure		
Opex input table (CA2.12)	Table replaced	Disaggregation into capex and opex not required. Total expenditure now incorporated into Workbook 09 – Revenue and financial statements.
Labour expenditure (CA2.11)	Table removed	Data not required.
Public lighting activities (CA4.1.2)	Table replaced	Disaggregation into capex and opex not required. Total expenditure now incorporated into Workbook 09 – Revenue and financial statements.

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Table name (RIN reference)	Change made	Rationale
Safety related activity	Table removed	Expenditure data not required.
Major event related activity	Table removed	Data not required.
Contingent project expenditure	Table redefined	Data to enable tracking of outcomes when contingent projects triggered.
RIT-D project expenditure	Table redefined	Data to enable tracking of outcomes for projects approved under the RIT.
Data Workbook 07: Capital expenditure		
Demand management incentive schemes (AR7.11.1)	Tables added	Table was unintentionally omitted from the consultation workbooks.
Overheads expenditure (CA2.1,2.10A/New CA/AR2.10)	Tables added	Table was unintentionally omitted from the consultation workbooks.
Public lighting activities (CA4.1.2)	Table replaced	Disaggregation into capex and opex not required. Total expenditure now incorporated into Workbook 09 – Revenue and financial statements.
Capex for provision of export services	Table redefined	Reflects data being requested and consulted on as part of the review into incentivising and measuring export services.
Capex input table (CA2.12)	Table removed	Disaggregation into capex and opex not required. Total expenditure incorporated into Workbook 09.
Safety related activity	Table removed	Expenditure data not required.
Major event related activity	Table removed	Data not required.
Contingent project expenditure	Table redefined	Data to enable tracking of outcomes when contingent projects triggered.
RIT-D project expenditure	Table redefined	Data to enable tracking of outcomes for projects approved under the RIT.
Data Workbook 08: Asset base values		
Alternative control services Benchmarking asset base (EB3.3.2)	Removed requirement to report ACS asset base for all asset categories except: metering; other assets with long lives; and other assets with short lives.	Only asset classes relevant to ACS are required.
All Asset Base tables	Removed 'Closing asset value (prior year)'	The inclusion of prior year value is not needed to validate the opening asset values.
All Asset Base tables	Capital expenditure is reported as Gross capex (including capital contributions) and capital contributions are also reported separately.	The separate reporting of capital contributions provides greater transparency over the data, and is consistent with the Roll Forward Model.

Table name (RIN reference)	Change made	Rationale
Data Workbook 09: Revenue and financial statements		
Demand Management Incentive Scheme (AR7.11.1)	Table added	Table was unintentionally omitted from the consultation workbooks.
Payments to embedded generators – other avoided TUOS payments (standard control services) (AR7.8.1)	Table added	Table was unintentionally omitted from the consultation workbooks.
Overheads expenditure – other distribution services (CA2.10(A))	Table added	Table was unintentionally omitted from the consultation workbooks.
Total expenditure – input tables (CA2.12)	Table added	Disaggregation into capex and opex not required. Totex included in this workbook instead.
Data Workbook 10: Prices		
Labour cost (CA2.11.2)	Table removed	Data not required.

Transmission

Table name (RIN reference)	Change made	Rationale
Data Workbook 02: Operational Outputs		
Energy not supplied	Table added	Data currently collected via an EB information request. Will now be collected under the Order.
Asset replacement and maintenance activities (previously called Asset replacement activities) (CA2.8.1 & CA2.2.1)	'Assets maintained' column added	Network maintenance activities are now incorporated into Asset replacement activities.
Asset augmentation activities – Lines (CA2.3.2)	Table expanded	Full table requirements were unintentionally omitted from the consultation workbooks.
Network maintenance activities (CA2.8.2)	Table replaced	Network maintenance activities are now incorporated into Asset replacement activities.
Safety related activity	Table moved	Data included in Workbook 03.
Major event related activity	Table removed	Data is not required.
Data Workbook 03: Network metrics		
Selected Asset Characteristics – Service area factors (EB3.7.3)	Table removed	Data can be calculated and is a duplicate requirement.
Selected Asset Characteristics – Asset Volumes	Column headings added 'Assets in Commission' 'Asset Replacements' 'Asset disposal'	Column headings unintentionally omitted from the consultation workbooks.
Selected Asset Characteristics – Substation reactive plan by reactive capacity	Column headings added 'Assets in Commission' 'Asset Replacements'	Column headings unintentionally omitted from the consultation workbooks.
Selected Asset Characteristics – Power factor conversion between MVA and MW	Column headings added 'Asset Replacements'	Column headings unintentionally omitted from the consultation workbooks.
Asset Age profile – Economic life (CA5.2.1)	Table removed	Data is not required.
Average Age of Asset Group (CA2.8.1)	Table replaced	Table replaced by a more concise collection of asset maintenance and inspection cycle data, aligned with asset categories used to report asset replacements and asset age.
Average Staffing Levels (CA2.11.1)	Table removed	Data is not required.
Average Staffing Levels - Descriptor Metrics (CA2.11.2)	Table removed	Data is not required.
Safety incidents	Table added	Data required to support new performance reporting analysis.
Data Workbook 05: Service performance		
No changes made		

Table name (RIN reference)	Change made	Rationale
Data Workbook 05B: Service performance		
New workbook - Performance - Exclusions	This new workbook has been created to capture data requirements as per Appendix B of the information guideline	Removing the information guidelines will remove these data requirements so we have created a new workbook to capture them.
Data Workbook 06: Operational expenditure		
Audited Statutory Accounts Income Statements	Allocated Opex by 'Causal Allocators' and 'Non-Causal Allocators' has been removed	Data is not required.
Regulatory Accounts (PTS) Income statements	Allocated Opex by 'Causal Allocators' and 'Non-Causal Allocators' has been removed	Data is not required.
Opex input table (CA2.12)	Table replaced	Disaggregation into capex and opex not required. Total expenditure now incorporated into Workbook 09 – Revenue and financial statements.
Labour expenditure (CA2.11)	Table removed	Data is not required.
Safety related activity	Table removed	Expenditure data is not required.
DER related expenditure	Table removed	Expenditure data is not required.
Major event related activity	Table removed	Data is not required.
Contingent project expenditure	Table redefined	Data to enable tracking of outcomes when contingent projects triggered.
RIT-T project expenditure	Table redefined	Data to enable tracking of outcomes for projects approved under the RIT.
Data Workbook 07: Capital expenditure		
Capex input table (CA2.12)	Table removed	Disaggregation into capex and opex not required. Total expenditure incorporated into Workbook 9.
Safety related activity	Table removed	Expenditure data not required.
Major event related activity	Table removed	Data not required.
Contingent project expenditure	Table redefined	Data to enable tracking of outcomes when contingent projects triggered.
RIT-T project expenditure	Table redefined	Data to enable tracking of outcomes for projects approved under the RIT.
Capitalised network overheads (CA2.11.1)	Table removed	Data is not required.
Capitalised corporate overhead (CA2.11.1)	Table removed	Data is not required.
Direct network labour (CA2.11.1)	Table removed	Data is not required.

Table name (RIN reference)	Change made	Rationale
Capex by Project (Regulatory Accounts – Historical Capex Network)	Tables removed	Data is not required.
Augex asset data – Lines (CA2.3.2)	Tables added	Data requirements were unintentionally omitted from the consultation workbooks.
Data Workbook 08: Asset base values		
All Asset Base tables	Removed 'Closing asset value (prior year)'	The inclusion of prior year value is not needed to validate the opening asset values.
All Asset Base tables	Capital expenditure is reported as Gross capex (including capital contributions) and capital contributions are also reported separately.	The separate reporting of capital contributions provides greater transparency over the data, and is consistent with the Roll Forward Model.
Benchmarking asset base by asset category – Group 3 assets adjustment	Table added	To enable reporting of Group 3 assets.
Data Workbook 09: Revenue and financial statements		
Total expenditure – input tables (CA2.12)	Tables added	Disaggregation into capex and opex not required. Totex included in this workbook instead.
Balances with related parties (Regulatory accounts)	Table removed	Data is not required.
Data Workbook 10: Prices		
	Workbook has been removed from data requirements	Data is not required.

C Issues raised on the Discussion Paper

Table C 1 Common issues and AER response

Issues relates to	AER response
Instrument – Type of	The AER has decided to develop regulatory information orders. We have balanced the need for flexibility against the drive for consistency across the sector, the reduction in administrative burden, and increased transparency of the expanded consultation process.
Instrument – Class of coverage	We have developed preliminary Orders to cover the following three classes of participants: Distribution; Transmission; and Interconnectors. Power and Water Corporation will initially be exempt from the Orders.
Instrument – Reporting period	The AER has implemented a four-year reporting cycle in the preliminary Orders. The four-year review cycle has been selected as it offers stability but does not allow the information requirements to stagnate. Each reporting period within the four-year cycle will reflect the business’ financial year. The Orders create a reporting framework, and capture information upon which the AER relies in its decision making. As such, stability in information requirements is highly valued, supporting use of data across multiple periods for time series analysis, enabling us to understand patterns in behaviours and outcomes and identify anomalies in the information reported.
Instrument – Compliance and flexibility	We do not consider a shift to Orders materially increases the risk of non-compliance faced by the regulated networks. As noted in section 2.1.1, the annual reporting process is not new, and the timing and extent of the obligations are well known. We consider the regulated networks should be able to manage those risks where the reporting obligations transfer to Regulatory information orders. In section 2.1.4 we address options for providing flexibility within the framework of Orders.

<p>Instrument – Timing</p>	<p>The preliminary Orders provide for initial reporting for the 2023-24 regulatory year.</p> <p>This timing balances the need to prepare systems to meet new reporting obligations, against the benefits from streamlined reporting compared to current requirements.</p> <p>The timing also reflects an expectation that new information exchange systems or tools will NOT be <u>required</u> to meet the obligations under the Orders.</p> <p>Existing RINs will be revoked once the new Orders are in place.</p>
<p>Data requirements</p>	<p>Data requirement issues raised in the submissions we received to our Discussion Paper have been addressed individually.</p> <p>AER responses to data requirement issues raised are available on our website. See supporting materials for workshops 1 to 8 https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/networks-information-requirements-review/preparation</p>
<p>Data Requirements - Are the data requirements workbooks also the data submission templates?</p>	<p>The consultation workbooks present data requirements and are not a tool for data submission.</p> <p>We will work with businesses to develop a data submission tool that minimises changes to current reporting processes but incorporates data validation to the extent possible. The data submission systems and tools will be the subject of separate consultation between the AER and businesses.</p>
<p>Data Requirements - The AER has identified new export services data requirements – can you provide more details?</p>	<p>The export services (DER) data requirements have been updated since the consultation workbooks were issued in March 2022. AER has been working with DNSPs to collect information required for export services. New export services information tables have been prepared and align with information currently being sought by the AER through information requests to which businesses have already responded. A draft set of reporting tables have been included with the material for Workshop 8, including definitions.</p> <p>In the context of the AER’s current review in relation to Incentivising and measuring export service performance, export service data requirements are being considered. This review runs until March 2023 and it is likely that the export service data requirements will be refined in line with the submissions to, and findings of, this review.</p>

<p>Data Requirements –</p> <p>Can you provide use cases for all data requirements</p>	<p>The AER has continued its assessment of data requirements and has presented use cases for all data. The preliminary Orders further rationalise the data required to be submitted annually.</p> <p>Data use cases are available on our website. See supporting materials for workshops 1 to 8 https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/networks-information-requirements-review/preparation</p>
<p>Data Requirements - Definitions</p>	<p>Definitions have been included in the consultation workbooks to ensure they are available to those compiling data.</p>
<p>Basis of Preparation</p>	<p>We have included a standardised basis of preparation in the Orders.</p> <p>Standardisation will improve comparability, especially our ability to identify changes over time. A defined file structure for the basis of preparation will also help us use the information in the future. The current range of file types (PDF/Word/Excel) and tables structures within files limits searchability and comparability –and therefore overall usability. We consider increasing usability is likely to drive improvements in the quality of the information presented in future. The information required reflects the instructions in the Orders (section 5.2). These information requirements are consistent with current requirements, but now include reporting of NULL responses and explanations for NULL responses, and description of changes compared to the previous year’s basis of preparation.</p> <p>The standardised basis of preparation is in the form of an excel table, which can easily be sorted and filtered using current systems and tools.</p>
<p>Assurance requirements</p>	<p>The preliminary Orders include independent assurance requirements that reflect our data use case and other factors, including the maturity of the data requirements, timing of data submission and any existing independent scrutiny (for example from AEMO or jurisdictional regulators) that may apply to the data.</p> <p>The implications of the change for the regulated networks are set out at Attachment A. For data where there is a limited current use case, and ill-defined future use case we have opted for reducing the required assurance standard.</p>
<p>Other (non-data) information requirements</p>	<p>The preliminary Orders exclude the obligation to provide network maps, descriptions of corporate structure and internal policy documents. The Orders do require policy documents to be identified and changes in those documents to be reported.</p>

<p>Transmission information guideline</p>	<p>The AER will put forward a rule change proposal to remove the obligation to publish a transmission information guideline.</p> <p>The AER will consult with stakeholders on a proposed rule change after we have reached the next milestone in the development of the new annual information Orders – that is, after we publish the draft Orders in June 2023.</p> <p>Our preliminary thinking is to propose a rule change to delete rule 6A.17 and address any consequential amendments arising from the deletion of the rule. We will propose the rule change to take effect from the date the final Orders are issued. Stakeholders are welcome to provide feedback during this consultation process, but we will run a separate process when we have more certainty over the contents and timing of the Orders (after the Draft Orders are published).</p>
<p>Information exchange</p>	<p>The preliminary Orders do not mandate any specific technology or tool by which the regulated networks must provide information. We intend the Orders remain ‘technology neutral’ to allow for information exchange to keep pace with changing technological solutions, but also to allow all businesses (and the AER) time to transition to alternative technologies.</p> <p>The AER commenced a process for consultation on development of new technology solutions for information exchange in November 2022. All stakeholders are welcome to monitor and participate in that process for the technological changes being managed by the AER. For more information see our website https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/future-technology-platforms</p>

Table C 2 All other issues raised in submissions on the Discussion Paper

Issue number	Raised by	Topic	Issue raised	AER response
1	Cadency Consulting	Customer engagement	The discussion of data collection and reporting is naturally a difficult area for customers to engage in. The review may benefit from seeking to create a customer map of the areas that customers consider important and seeking to connect the existing data collection to these objectives. This may help to identify areas for focus where customers see value.	We agreed this review may be a difficult process for customers to participate in effectively. So while it remains open to all stakeholders, we are also leveraging customer engagement in other consultation processes, including resets and development work such as export services.
2	Endeavour Energy	Review scope	We note the AER's review is limited to the annual information collection process relating to historical information submitted for the most recently completed regulatory year. We encourage the AER to consider expanding the review to include the Reset RINs as many of the opportunities for efficiency and information consistency improvements lie within the forecast RIN templates.	We will align data requirements between historical and forecast data as new regulatory instruments are developed.
3	Energy Queensland	Definitions	Ergon Energy and Energex request that the AER consider adopting the energy regulator for Great Britain's (Ofgem's) approach to developing, in coordination with service providers, a common framework of definitions, principles and calculation methodologies for the assessment, forecasting and regulatory reporting of asset risk. Ofgem's framework is known as the Common Network Asset Indices Methodology (CNAIM).	The AER has not actioned this suggestion at this time but will continue to work with NSPs to ensure the concepts and terms used in the Orders result in a shared understanding of requirements.

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Issue number	Raised by	Topic	Issue raised	AER response
4	Powerlink	Difficulties with adopting common definitions	There appear to be practical limitations to the ready adoption of common definitions, as networks currently use different reporting conventions that reflect their history and business models and to address needs of their specific stakeholders. For example, Powerlink understands that different networks adopt different approaches when they report information on secondary systems. This flexible treatment extends to financial reporting standards, cost allocation methodologies and capitalisation policies. Consequently, it may take considerable time and resources for networks to transition to a framework that adopts common regulatory information reporting definitions.	<p>Definitions of terms and concepts have been included in the new Orders. These definitions substantially mirror those in existing information requirements.</p> <p>Where the definitions have been subject to materially different interpretation by NSPs, we will work with them to minimise the discretion where it materially impacts reported information.</p>
5	Energy Queensland	Reasons for removal of data	Ergon Energy and Energex acknowledge receipt of the AER's mapping table between existing instruments and the proposed RIO on 2 May 2022. This will assist in verifying it is the AER's intention to omit existing requirements from the proposed RIO. Whilst we are yet to complete a detailed review of this mapping table, it would be beneficial to understand the AER's reasons for the removal of information (e.g., reported elsewhere DAPR, not required, or not a common requirement between class of participants).	At this stage the information any requirements omitted from the preliminary Orders have been omitted as they are not required.
6	AusNet Services	Recast data	We request the categorisation of data and requirements of the Reset RINs be considered in the development of the new information instrument/s to ensure that historic data isn't required to be recast and re-audited as part of the Revenue Reset process. Currently, differences in requirements between the Annual RINs and Reset RINs increases the cost of compliance and regulatory reporting burden.	The development of new Orders is not expected to trigger a requirement for historical data to be recast.

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Issue number	Raised by	Topic	Issue raised	AER response
7	AusNet Services	Data requirements	We request that the new instrument mandates that data provided is required to be mutually exclusive. This includes new information requested such as Safety-related expenditure. Without this requirement, data reported is unable to be effectively compared across businesses.	Noted.
8	Endeavour Energy	New requirements	Clear and unambiguous definitions and instructions are essential to ensure any new reporting categories are mutually exclusive from other expenditure categories to avoid double counting.	Noted.
9	Essential Energy	Timing of new requirements/ backcasting	Sufficient time should be given to businesses to source the data and to collate it into the format required. It will be important to minimise the number of additional information requests issued, given the extra resource and cost commitments this will impose on network businesses. Furthermore, any new data requirements should be on a prospective basis and not require back casting.	At this stage the new Orders do not require backcasting of any data. We expect the timing to be sufficient for new information requirements to be met by the networks.
10	TasNetworks	Future data requirements	For new data requirements we would encourage careful consideration in relation to back-cast data requirements, the provision of which currently adds considerably to the cost of responding to RINs. We consider that the process for adding new information to templates (and removing information from templates) is something that is best undertaken collaboratively between the AER and the networks it regulates. The consultation process utilised by the AER to develop metrics to measure the performance of networks in hosting Distributed Energy Resources demonstrates the merit and effectiveness of such an approach.	We agree that the process of developing new data requirements is best managed outside of the development of the Orders, to the extent possible.

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Issue number	Raised by	Topic	Issue raised	AER response
11	ENA	Future review	ENA also supports the AER's approach to considering potential new information requirements within period via informal collaborative processes and encourages the AER to consider the resource-intensive impact of potential data backcasting requirements. When reviewing future network information requirements, however, there is also a need to address the ongoing need for current data series (along with the inclusion of potential new data) as data series may become redundant or duplicative over time as circumstances change.	Agreed.
12	AusNet Services	Actual and estimated information	We request additional functionality be added within workbooks to specify whether data provided is 'Actual Information' or 'Estimated Information'. This change would alleviate the current administrative burden associated with preparing 3 versions of all RIN templates: Actual, Estimated and Consolidated.	Agreed. We consider the information on data quality (actual or estimated) can be reported in the basis of preparation. The development of data submission tools and systems may also encompass the data quality element in the future.
13	Essential Energy	Estimated data	Support the move to a RIO, to help drive consistency in reporting. Note that it may mean an increase in estimated data.	The preliminary Order reflects current arrangements where estimated data may be reported in circumstances where actual data is not available.
14	Jemena	Estimated data	Given the new data requirements being requested, we require a larger scope for estimated data than what is currently provided in the existing RINs.	Noted.
15	Endeavour Energy	Estimated data	The need for estimates is likely to be enduring given reporting actuals for some items (e.g. average tree counts per maintenance span as part of "terrain factors") is not possible or reasonable when considering the time and cost required to do so.	The preliminary Order reflects current arrangements where estimated data may be reported in circumstances where actual data is not available.

Preliminary Annual Information Orders – Explanatory statement

Issue number	Raised by	Topic	Issue raised	AER response
16	ENA	Estimated data	The standardisation of the information requirements across networks will likely also drive a further need for estimation, particularly as industry transitions, and this will need to be recognised in the detailed data requirements as they are developed.	The preliminary Order reflects current arrangements where estimated data may be reported in circumstances where actual data is not available.
17	TasNetworks	Use cases Jurisdictional differences	It is essential that the information requests used by the AER continue to cater for different jurisdictional arrangements, such as the classification of distribution feeders in Tasmania.	We consider most jurisdictional differences can be managed through the development of the new Orders.
18	Energy Safe Victoria	Confidential information	When negotiating the terms of the RIO with the regulated electricity networks, the AER could consider whether its default position should be that any data reported to the AER under the RIO should become public domain. There may be classes of data that need to remain commercial in confidence. Where possible, data excluded from the public domain should still be available to other Government agencies providing it supports efficient and effective sharing of information required for regulatory functions.	Our default position is that all information provided is treated as public information unless a claim for confidentiality is made.
19	AusNet Services	Confidential information	We also request the AER add functionality that redacts confidential information, reducing the administrative burden associated with preparing 2 versions of all Consolidated templates: Public (publish) and an AER (confidential) version.	Agreed. The preliminary Orders include requirements to identify confidential information at the time of submission, so the AER can manage the data securely. We intend to continue current RIN arrangements for identifying and protecting confidential information.

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Issue number	Raised by	Topic	Issue raised	AER response
20	Powerlink	Confidential information	For several information reports, including the RINs and regulatory accounts, Powerlink claims confidentiality on some information currently provided under the AER's Confidentiality Guideline. However, the Discussion Paper and consultation workbooks do not clarify how confidential information will be handled under the new information requirements framework. We recommend this aspect of the framework be confirmed in the next stage of consultation.	Agreed. The preliminary Orders include requirements to identify confidential information at the time of submission, so the AER can manage the data securely. We intend to continue current RIN arrangements for identifying and protecting confidential information.

Issue number	Raised by	Topic	Issue raised	AER response
21	AusNet Services	Instrument	<p>We do not have any concerns with the introduction of regulatory information orders (RIOs), providing the new instrument/s accommodate the following:</p> <p>1. Jurisdictional differences: We agree with the AER’s comments that the new instrument must continue to cater for jurisdictional differences.</p> <p>For example, AusNet Transmission does not have accountability for the Transmission Planning function in Victoria. As such, certain information requested in the Regulatory Information Notices (RINs) is owned and controlled by AEMO. This information is currently removed from our submission requirements as we can’t report, obtain assurance and provide certification over data that is not owned or controlled by our business. We request the new instrument incorporates such considerations.</p> <p>2. Reporting period variations: We request that the new instrument/s accommodate the STPIS-related reporting period variations incorporated in the existing RINs.</p> <p>For example, AusNet Transmission currently reports STPIS related data and Market Impact Component parameters on a calendar year basis - in alignment with the underlying schemes. This differs from AusNet Transmission’s Regulatory Year. AusNet would like to preserve these reporting period variations to ensure the data provided is meaningful and to prevent duplication of effort.</p>	<p>We consider some jurisdictional differences can be accounted for in the Orders. We agree TNSP STPIS information must continue to be collected in a way that supports the requirements of the STPIS, including timing of the data submission and calendar year reporting.</p>

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Issue number	Raised by	Topic	Issue raised	AER response
22	Powerlink	Requests for guidance and publication of guidance material	We support the AER's proposal to publish guidance material on its website to assist businesses consistently apply information requirements. This could take the form of a "frequently asked questions" page or a non-binding guideline. However, we consider the AER is not required to identify the businesses that make requests for guidance. We are not aware of any relevant regulatory requirement on the AER to identify businesses that request guidance and consider this is not required to get the intended outcome. Moreover, this could dissuade businesses from seeking advice and may adversely affect compliance with the new instrument.	We agree that consolidated guidance material should be made available to all NSPs. We will review the development of that material and note preference for businesses names not to be published.
23	AusNet Services	Debt data	We request that the data sought in the current Debt RIN be amalgamated in the new information instrument/s.	Agreed.

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Issue number	Raised by	Topic	Issue raised	AER response
24	DELWP	Low voltage network data	<p>The Victorian Government recommends that the information requirements for energy networks explicitly specify the public provision of data on the low-voltage network, where significant gaps currently occur.</p> <p>The provision of data at low-voltage network levels on network constraints and opportunities for non-network solutions would enable non-network parties (e.g., community energy groups, local councils and energy retailers) to locate available capacity in the network for varying sized DER connections and support Victorian Government policy and priorities for the continued development of DER. Energy networks are best placed to identify the highest value locations and opportunities for DER connections given their understanding of network needs and infrastructure. However, as regulated monopolies, it is important that they make this information available to all potential providers of DER services (including consumers). Under the Consumer Data Right (CDR), the Australian Energy Market Operator (AEMO) provides data on energy consumption patterns to trusted third parties when authorised by the consumer. Authorised sharing of such information can enable consumers to make more informed choices.</p>	<p>New data requirements on the low voltage network are being developed and have not yet been integrated into the Order. The AER is likely to collect this data using less formal processes, with a view to integrating the requirements into the Orders in the future.</p>
25	Power and Water Corporation	New data duplication	<p>With regard to the questions of any new data the AER should consider and changes to data submission requirements, we currently have underway a meter-to-cash (M2C) program across our network and would like clarification from the AER on how this program would be reported in the proposed RIO. Our concern is that the burden to collect and process this data would not outweigh the utility the AER derives from its use in their regulatory activities.</p>	<p>Noted.</p>

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Issue number	Raised by	Topic	Issue raised	AER response
26	Powerlink	Future review	<p>We appreciate that informal collaborative processes under the AER's established information gathering powers can help address information collection gaps between reviews. In the next stage of consultation, we recommend the AER provide more guidance on how interim requests for additional information would work in practice, including:</p> <ul style="list-style-type: none"> • how the AER would seek to demonstrate the need for the collection and use new data series to networks and other stakeholders; and • how feedback provided by networks may be accommodated by the AER between formal reviews and during subsequent formal review processes. 	<p>We consider the development of profitability information requests and the development of export services data to be good examples of how we will work to define new information requests and integrate them into the formal Orders.</p>
27	QUEN	Frequency of reporting	<p>Some data series would be better collected more frequently (quarterly) to help the sector analyse impacts on new tariffs. This includes tariff information.</p>	<p>Information submission timing can be addressed in the development of the Orders, and where necessary frequency and submission dates may vary from the standard requirement.</p>
28	Powerlink	Interim reporting	<p>If the AER wish to pursue an information order framework that applies to classes of networks in the long term, we recommend the information notice framework operate as an interim measure to enable networks and the AER to agree on definitions to use, communicate and gain customer acceptance for the costs associated with these changes and for networks to implement the required system changes.</p>	<p>The AER does not consider the interim framework is necessary, given the bulk of the data requirements have been reported against for a decade or more.</p>
29	QUEN	Timeliness of data	<p>The delays in releasing data to stakeholders are too long. It can be 6 months or more after the end of a reporting year before consumer groups can access information from the AER. That should be shortened as much as possible.</p>	<p>Noted. The AER releases data as soon as possible, after necessary compliance and confidentiality checks have been undertaken.</p>

Preliminary Annual Information Orders – Explanatory statement

Issue number	Raised by	Topic	Issue raised	AER response
30	Cadency Consulting	Reporting options for consumers	The existing Excel spreadsheet models are incomprehensible to most customers. There would be customer value in providing NEM-wide and DNSP data in an accessible format. This would aid in improving visibility, customer engagement, DNSP accountability and overall trust in the regulatory system. Consideration should be given to how to make this data more accessible and valuable to consumers.	Agreed. The AER is progressing work to present its data assets in a form more accessible to all stakeholders. That work is progressing outside of this review but will include networks data.