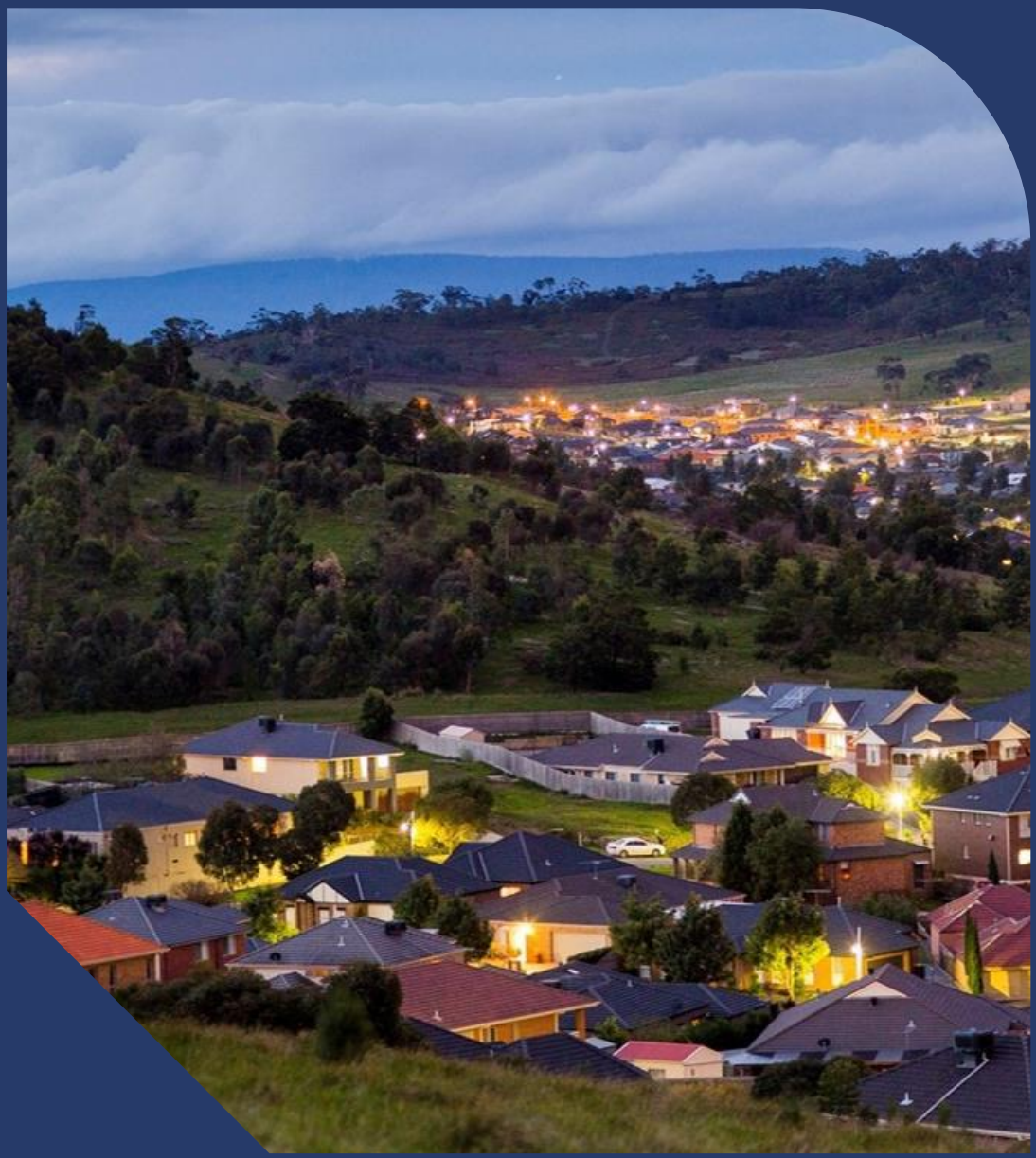
AusNet

# Benchmarking Proposal

## 2026-31 EDPR

Friday, 31 January 2025



AusNet

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# 1. Overview

This document sets out proposed modifications to the AER's benchmarking methodology that AusNet considers should be applied by the AER.

Economic benchmarking is used by the AER to 'measure how productively efficient… networks are at delivering electricity distribution services over time and compared with their peers'.[1] Benchmarking is also applied by the AER as part of its efficiency assessment of a distributor's Regulatory Proposal, particularly operating expenditure benchmarking, which can be applied deterministically. Benchmarking results are published annually, and stakeholders (including customers and investors) have regard to these results when forming opinions about the performance of a network business. For these reasons, benchmarking is an important part of the regulatory framework.

AusNet's 2022-23 opex base year for the purposes of opex forecasting has been confirmed to be not materially inefficient by the AER's 2024 Annual Benchmarking Report[2], with AusNet one of the top six most efficient DNSPs with an efficiency score above 0.75.

Notwithstanding this, the AER's current benchmarking methodology contains significant issues of concern that need to be addressed to improve its accuracy. These are issues that can have material impacts on benchmarking results; both the econometric models and the headline Total and Partial Factor Productivity models presented in the Annual Benchmarking Reports.

This paper explains these issues and outlines our proposed approach to addressing them.

Our proposed changes to the benchmarking models include:

- Removing GSLs from benchmarked opex
- Applying a severe storm OEF using cost pass through data
- Developing a new terrain OEF by using average steepness measures
- Modify the Bushfire risk OEF by adding up-to-date relevant costs
- Do not apply the taxes and levies OEF
- Do not apply a vegetation management responsibility OEF
- Clarify the treatment of emergency preparedness costs, to remove uncertainty over the degree of benchmarking risk these costs may contribute to, that can impact business decision making to the detriment of customers.

While some of these solutions have been proposed to the AER previously, we are raising these issues again in the context of the Regulatory Proposal given they have not yet been resolved and may impact any benchmarking assessments the AER undertakes during determination process.

In addition, to efficiently and accurately progress many of these issues it is necessary for comparable information to be provided by other distributors, which we are unable to obtain without support from the AER.

[1] AER, 2022 Annual Benchmarking Report, page iii
[2] AER, 2024 Annual Benchmarking Report, page 32, available here: Report template

# 2. Customer engagement

We targeted a relatively low (inform/ consult) level of engagement on the IAP2 spectrum with the Opex and Benchmarking panel. This was because our positions on many of the benchmarking issues discussed with the panel have been considered, developed and raised with the AER over several years and we therefore saw limited ability for stakeholder feedback to influence our positions. In addition, the approach to forecasting opex for regulatory purposes is also relatively mechanistic and settled. Nonetheless, we sought feedback from the panel on how we applied the opex forecasting methodology including various inputs and have reflected some of their positions in our proposal.

Over a two-year period, we had some productive discussions with the panel focused on:

- Adjustments for capitalisation in the headline productivity models, following the AER's 2022 review of the treatment of capitalisation for benchmarking purposes;
- AusNet's relatively poor performance under the benchmarking and the reasons for this;
- The operating environment factors (OEFs) we proposed in April 2023 to account for differences in terrain, storm risk and enhancements to the bushfire risk OEF (Attachment 1);
- The additional opex to increase storm preparedness, arising from the Network Outage Review Panel recommendations, not being recognised as efficient under the benchmarking;
- Our choice of base year for the 2026-31 revenue proposal and the rationale for this choice;
- Opex step changes that will be included in our Revenue Proposal, noting many step changes arose through engagement with the other reset panels; and
- Capital productivity benchmarking, explanations of the results and the implications.

Members of the AER's benchmarking team were present for several of the above discussions. The panel was appreciative of the explanations of the approach and acknowledged that the AER would undertake its standard efficiency assessment of our opex base year.

The panel also expressed a view that the 0.75 efficiency cut off point is too low, given this indicates that all networks in the top quartile are efficient enough, whereas in a competitive market it is likely that many of these firms would not be cost competitive. We note the AER has indicated it will review this cut-off point in 2025-26, after this current round of resets[3].

[3] AER, 2024 Annual Benchmarking Report, p. 66. Available here: Report template

# 3. Specific Benchmarking Issues

This section summarises issues with the benchmarking methodology. These include:

1. GSL
2. OEFs – storm risk, bushfire, taxes and levies
3. Model specification concerns
4. Reviewing the 0.75

We have also provided some new proposals that can be adopted as part of this regulatory determination, as they either reflect recent AER practice or apply data that is available in the regulatory reporting. These include:

- A new approach to developing a storm OEF by using cost data from cost pass throughs; and
- Removing the Taxes and Levies OEF (consistent with the Final Decision for Evoenergy).

Our proposal focuses on opex benchmarking as this is a tool used by the AER to assess the efficiency of opex forecasts in revenue determinations. However, we have similar concerns with the capital productivity benchmarking approach and consider this would also benefit from a review.

# 3.1. Guaranteed Service Levels (GSLs)

## Proposal: Remove GSLs from benchmarked opex

The Guaranteed Service Level scheme that applies to AusNet is set by the Victorian Essential Services Commission (ESC) in the Electricity Distribution Code of Practice (EDCOP). These are payments for customers who experience poorer levels of reliability of supply than set through the thresholds of the scheme.

Most other jurisdictions in the NEM are either subject to the national GSL scheme administered by the AER, with only South Australia and Victoria applying their own jurisdictional GSL schemes. This is particularly relevant given typically the Victorian and South Australian distributors comprise the benchmark comparators for the purposes of the efficiency assessment, meaning that the opex impact of jurisdictional schemes are the relevant reference point for assessing the efficiency of all other networks.

A comparison of the schemes is shown in the table below:

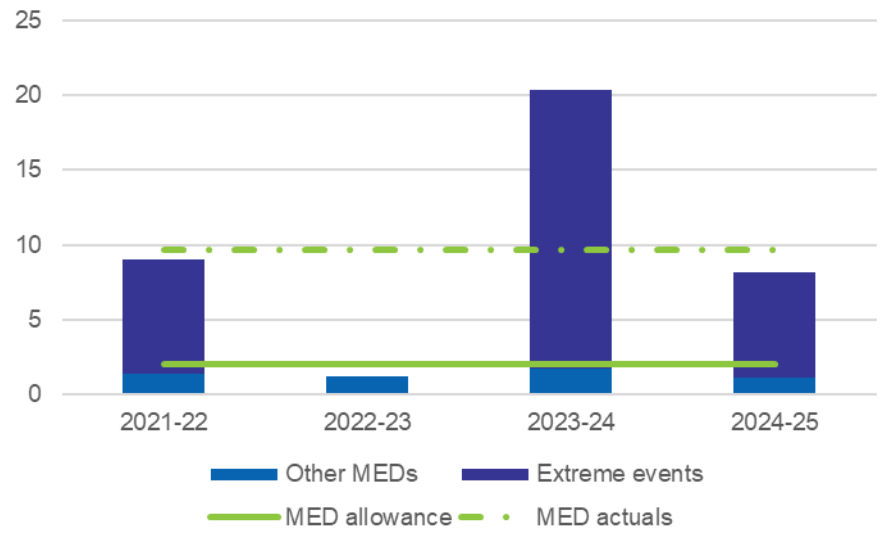
| Duration | National (CBD and urban) | National (Rural) | Victoria | South Australia |
|---|---|---|---|---|
| >12 hours | $80 | $0 | $0 | $0 |
| >18 hours | $80 | $80 | $130 | $0 |
| >20 hours | $100 | $100 | $130 | $100 |
| >30 hours | $150 | $150 | $190 | $150 |
| >60 hours | $300 | $300 | $380 | $300 |
| MED >12 hours | $0 | $0 | $90 | $0 |

| Frequency of sustained interruptions | National (CBD and urban) | National (Rural) | Victoria | South Australia |
|---|---|---|---|---|
| >8 | $0 | $0 | $130 | $0 |
| >9 | $80 | $0 | $130 | $100 |
| >12 | $80 | $0 | $190 | $100 |
| >15 | $80 | $80 | $190 | $100 |
| >20 | $80 | $80 | $380 | $100 |

The Victorian GSL rates are higher in every case except the National GSL outage duration payment for CBD and urban feeders, which begins at 12 hours rather than the 18 hours under the Victorian GSL scheme. The Victorian scheme is also the only scheme that contains a specific payment for Major Event Days. In the National GSL scheme, Major Event Days are excluded from the calculation of both the duration and frequency of sustained interruptions. In the South Australian scheme, Major Event Days may be partially excluded where circumstances outside SA Power Networks' control prevent it from restoring supply to customers (i.e. access issues following a natural disaster).

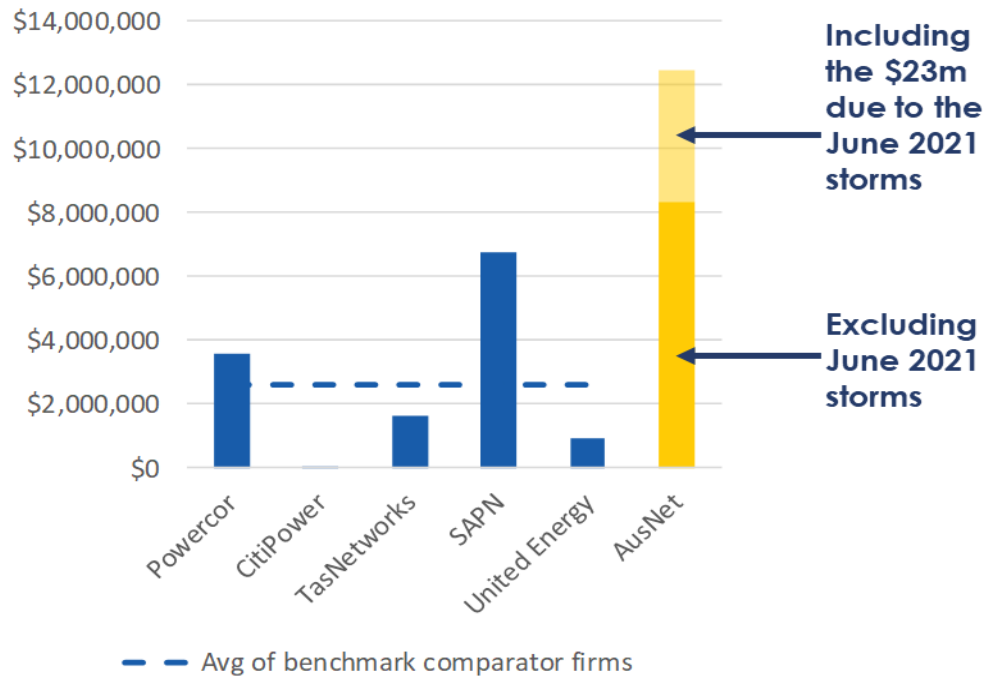
The impact of this on an annual GSL bill can be very material; given that by definition Major Events impact a very large number of customers. The figure below shows the impact of MED GSL payments on AusNet's opex in the current regulatory period, averaging $8.3m, or around 3% of opex, per annum. If we were subject to the National GSL scheme the equivalent impact would be $0.

**Figure 1: Actual MED GSLs (as incurred by mid-Dec 2024) v allowance ($m, nominal)**




These differences in payment rates reflect different regulatory policy settings by different regulators and are unrelated to the productive efficiency of the networks. This, combined with differing reliability performance (some of which is due to inherent differences in network topology and operating environment) of networks has led to large differences in average GSL payments over time. The figure below shows the annual average GSL payments using data up to 30 June 2022, where the inclusion of the June 2021 storm payments significantly increases our average. This problem has only exacerbated over the last couple of years, with the February 2024 and September 2024 GSL payments amounting to $18.6m and $7m respectively.

**Figure 2: Average GSL opex for benchmark comparator firms**




*Note: Victorian businesses – annual average over 5.5 years (CY2017 to FY2022); SAPN – annual average over 6 years (FY2017 to FY22; TasNetworks – annual over 5 years (FY2018 to FY2022) as the data for the other years cannot be sourced*

Given the lack of comparability of GSL payment schedules across jurisdictions, including GSL opex in the benchmarking models distorts the benchmarking results as they are not comparing the efficiency of networks on a like-for-like basis. This distortion can be easily addressed by excluding GSL opex from benchmarking analysis.

In addition, GSL payments are primarily driven by poor reliability. Reliability is separately counted in the benchmarking model as a specific output (minutes off supply). This means including GSL opex double counts the impact of poor reliability on the benchmarking results. This further distorts results by overweighting the importance of reliability to the outputs of distribution networks.

Finally, GSL payments are not only an input (cost) into providing distribution services, but these payments are received by customers, and so these payments also can be considered an output of providing distribution services. In some years these amounts have been very material for our customers – for example in 2023-24 we paid customers over $26M. However, the current benchmarking approach only recognises the input cost, and not the value of the payment received by the customers it is transferred to, which could be added as an output in the benchmarking model.

Over the last 6 years, AusNet has proposed the following approaches for dealing with GSLs:

- Remove GSLs from benchmarked opex **(preferred)** because this cost is easily identified from financial reporting, and the most straightforward and most accurate way of adjusting for the differences in the jurisdiction schemes.
- Include GSL opex as both an input and an output in the benchmarking models, reflecting the value received by customers from this transfer payment. This approach more accurately reflects the role of GSL payments (being a transfer) and reduces (but does not eliminate) the impact of GSL payments on networks' productive efficiency.
- Develop a GSL OEF – In its 2018 Operating Environment Factors report to the AER, Sapere Merz identified GSLs as an OEF candidate given they are primarily exogenously driven, differ between jurisdictions and are quantifiable and identifiable through financial reporting[4]. AusNet supports this if neither of the other two options above (which are a more direct and accurate way of addressing the issue) are not progressed.

[4] Sapere Merz 2018, Independent review of Operating Environment Factors used to adjust efficient operating expenditure for economic benchmarking, for the Australian Energy Regulator

It is important to note when considering this approach that the impact of poorer reliability is separately considered in the benchmarking model, and our position is not that the impact of reliability performance should not be considered.

# 3.2. Operating Environment Factors

Operating Environment Factors are adjustments applied to the econometric benchmarking results to account for external factors that can influence a distribution network service provider's (DNSP's) operating costs but are beyond its control. These adjustments help to ensure a fair comparison between DNSPs in the AER's benchmarking, which is used to assess the efficiency of each network. The criteria applied by the AER to identify relevant OEFs are:

- Exogeneity – must be outside the distributors' control
- Materiality – must have a material impact
- Non-duplication – not accounted for elsewhere (i.e. in both inputs and outputs), such that including an OEF would double count the effect.

We have presented several OEF-related proposals to the AER, including in 'A proposal for updating the AER's benchmarking models' which was submitted to the AER in April 2023. The intent of this document was to describe methodologies to quantifying OEFs relevant to AusNet's network which would require additional data to be collected from distributors, prior to the Victorian reset process. This allowed time for the AER to collect the data and develop its approach prior to the determination process.

Our proposals from this document are summarised below, along with a couple of new proposals that can be developed as part of this determination process, being:

- Storm OEF – an alternative approach relying on cost pass through data, similar to the approach applied to quantify Ergon's cyclone OEF;
- Taxes and levies OEF – we propose that this OEF is not applied; and
- Storm preparedness and response opex – that the AER confirms the future treatment of this opex for benchmarking purposes.

### 3.2.1. Storm OEF

## Proposal: Apply the OEF using cost pass through data

### Proposal presented in April 2023

Some networks have a higher exposure to storm frequency and damage due to, for example, the proximity of vegetation to lines. Differences in storms risk can be best accounted for by collecting data going forward on the cost of severe storms and developing an OEF. This approach was listed in Sapere Merz's 2018 report and may become more important over time due to the impacts of climate change.

The Sapere Merz report stated that the intent of a severe storms OEF is to account for systematic differences in the incidence, severity or extent of severe storms giving rise to:

1. Differences in emergency response expenditures following asset failures

2. Incremental opex to make networks safe in advance of storms

3. Incremental opex to restore supply promptly in the event of storm caused outages – this may include intensive maintenance until such time that any assets, where repair is uneconomic, are replaced in part or in full[5].

The Sapere Merz report analysed cost data in the RINs in an attempt to quantify the opex related to severe storms. However, the report concluded that it is not possible, because there is no clear demarcation of opex relating to severe storm events[6]. The report provided two ways forward:

1. Using existing data on MED causes to develop loadings to apply to MED emergency response opex for each DNSP; or

2. Developing more specific guidance on the definition of extreme storm events in RIN returns and collecting consistent data against these definitions.

In its April 2023 proposal, AusNet proposed the AER progresses the second of these approaches and that the AER develops a consistent approach for networks to report severe storm recovery opex in RINs going forward.

However, as this has not been progressed, if required in this determination, an OEF can be developed without relying on additional data from other distributors, instead publicly available cost pass through data can be applied to develop an OEF.

## Alternative proposal that can be applied without seeking additional data from other Networks

In the event that an alternative opex base year is selected whereby AusNet is no longer a benchmark comparator firm, a severe storm opex OEF should be developed based on available cost pass through opex. The following approach is proposed:

**Step 1** – Using storms cost pass through applications submitted as a proxy for severe storms included in this OEF, calculate the annual average severe storm opex for the benchmark comparator distributors.

| Distributors | Pass through opex^ | Annual average |
|---|---|---|
| AusNet | RY21: June 21 storms: $7m<br>RY22: Oct 21 storm: $5m<br>RY23: Nil<br>RY24: Feb 24 storm: $8m | $5m |
| Powercor | Nil | $0 |
| Citipower | Nil | $0 |
| United Energy | Nil | $0 |
| SA Power Networks | Nil | $0 |
| TasNetworks | Nil | $0 |

^ Note the September 2024 storm pass through costs have been excluded from this document due to timing but could be included if progressed

The opex included in the table above excludes the impact of GSLs. However, if GSLs are not removed from the benchmarking analysis as set out above, GSL MED payments should be included in this opex to estimate a severe storm OEF.

**Step 2 –** Use the annual average storm pass through opex (i.e. $5m for AusNet) to calculate the OEF using the Extreme Weather Events column placeholder in the AER's existing OEF model.

Applying this approach leads to an OEF adjustment of 2.61%[7] for severe storms.

This approach is very similar to the approach used to quantify the cyclone OEF applied to Ergon Energy which is based on average opex incurred to respond to actual cyclones over a 10-year period. While

[5] Sapere Merz 2018, Independent review of Operating Environment Factors used to adjust efficient operating expenditure for economic benchmarking, for the Australian Energy Regulator, p. 83.
[6] ibid, Section 4 Other candidate OEFs, p. 24.
[7] Based on the OEF dollar amount divided by Ideal Efficient Base opex

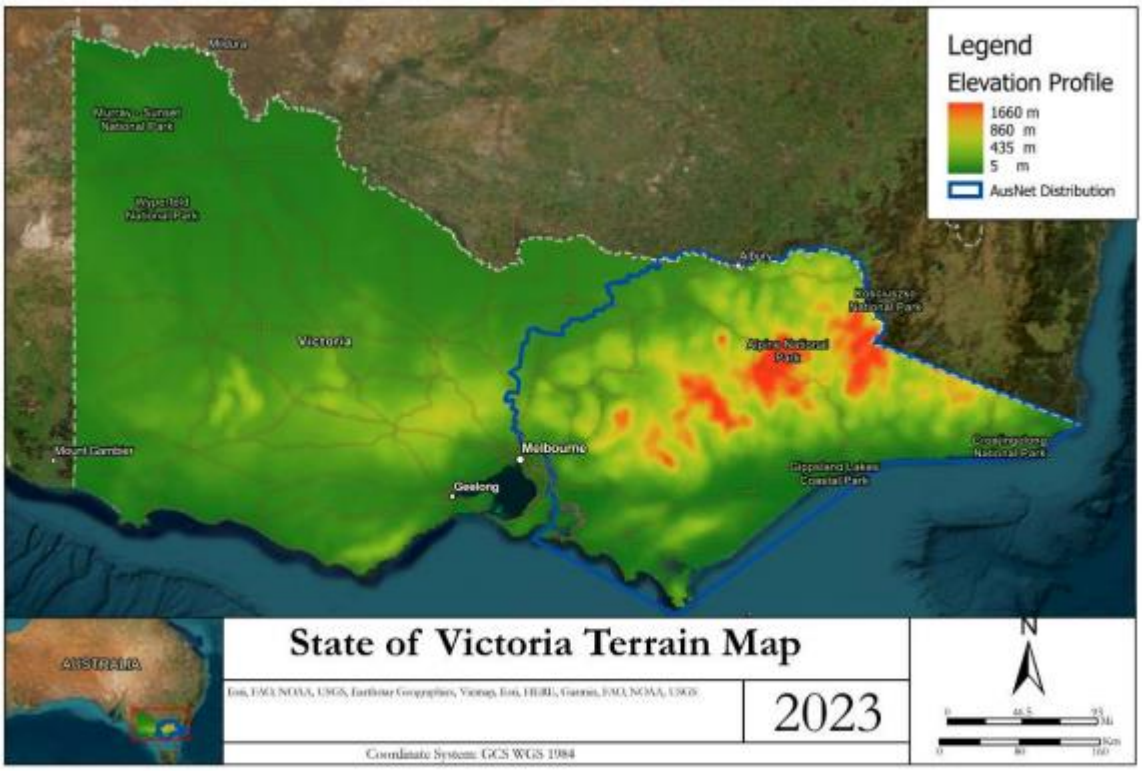
this approach is not 100% accurate as it does not include the indirect cost of storm events, it is a straightforward and transparent way to quantify and adjust for most of the impact of major events on cost.

### 3.2.2. Terrain

## Proposal: Incorporate new average steepness measure as an explanatory variable into the AER's benchmarking models

A significant proportion of AusNet's assets are in challenging terrain, which are difficult to access, or access and navigation is indirect, or special vehicles may be needed, which makes operating and maintenance activities more time consuming and expensive. An elevation map of Victoria shows that our elevation regularly exceeds 1,000 metres whereas the profiles for the other Victorian networks (3 of which are included in the benchmark comparator set) are relatively flat. AusNet's average elevation is 441 metres compared to the average of the other Victorian network businesses at 108 metres.

**Figure 1 Elevation profile of Victoria**




*Source: AusNet analysis*

The Sapere Merz report provided a discussion of network topology which is a related issue to terrain. The Sapere Merz's report discussed how a network topology OEF would quantify for the differences in efficient costs between urban/meshed networks and rural/radial networks, which would also encapsulate the differences in terrain and road congestion[8]. Sapere Merz concluded that this OEF could pass all three of the OEF criteria (exogeneity, materiality, and no duplication)[9], yet there is further work to be done before it can be sufficiently identified and assessed[10]. We agree with the Sapere Merz report, that the impact of topology and terrain could be explored through considering the impact on operational costs including travel costs, depot costs, and preventative maintenance[11].

[8] Sapere Merz 2018, Independent review of Operating Environment Factors used to adjust efficient operating expenditure for economic benchmarking, August, section 4.2
[9] Ibid, section 4, page 1.
[10] Ibid, section 4, page 1.
[11] Ibid, section 4.2.6.

We also agree with Sapere Merz that terrain or topology/topography has the potential to explain for cost differences and can be incorporated into the AER's benchmarking models in a similar way to circuit length[12]. This is an issue that networks have raised for many years, including in response to the Sapere Merz report.

Differences in terrain can be accounted for by introducing a new 'steepness' output in the benchmarking models, as we consider steepness is a material driver of costs. This output would reflect the terrain over which DNSPs deliver electricity to their customers and is similar in nature to (but does not overlap with) circuit line length as an output, which reflects the distance over which DNSPs deliver electricity to their customers. We recommend using average steepness as the explanatory variable because it reflects the challenges that distribution businesses face and it is easy to understand. It is also a relatively straightforward metric to calculate where the maps required for its calculation are publicly available. In our April 2023 proposal to the AER, we provided data showing the average, minimum and maximum elevation, and the standard deviation, for the Victorian distributors, using publicly available mapping data. The results are shown below. While we have not calculated average steepness, this can be done using the mapping data we have for Victoria (and we expect is publicly available for other networks).

**Table 1 Elevation by network, in metres (Victoria)**

| Description | Average elevation | Maximum elevation | Minimum elevation | Standard deviation |
|---|---|---|---|---|
| **AusNet** | 441 | 1,921 | -51 | 370 |
| **Powercor** | 152 | 963 | -1 | 115 |
| **CitiPower** | 40 | 110 | 1 | 28 |
| **Jemena** | 190 | 549 | 5 | 126 |
| **United Energy** | 51 | 228 | 0 | 41 |

*Source: AusNet analysis*

If the AER indicates they would like to explore this as an additional output we are happy to assist with this analysis.

### 3.2.3. Bushfire Risk

## Proposal: Add additional, recent bushfire risk-related costs to the current bushfire risk OEF

The current bushfire risk OEF accounts for bushfire-related regulatory obligations arising from the bushfire royal commission and was first applied in the 2016 Victorian DNSPs decisions. More recently, new bushfire-related costs have arisen since the 2016 reset that needs to be incorporated into the AER's bushfire OEF.

These include:

- Rapid Earth Fault Current Limiters (REFCLs) opex – Victorian legislation required the roll out of REFCL technology. There is an ongoing opex cost associated with maintaining REFCL compliance which should be added into the bushfire risk OEF for the same reason as the costs arising from the royal commission recommendations, given REFCL compliance is a legislated requirement.
- Bushfire liability insurance premium costs – these vary due to a range of factors including the inherent exposure to bushfire risk of different distribution networks. This cost should be added to the existing bushfire risk OEF to more accurately reflect the cost impact of the exogenous difference in bushfire risk between networks.

### 3.2.4. Taxes and Levies

[12] Ibid, section 4.2.6.

## Proposal: Do not apply the Taxes and Levies OEF in our determination

AusNet welcomes the correction of a material data issue impacting AusNet's Taxes and Levies OEF, being the exclusion of regulator fees. We also note that the AER now treats both ESC and ESV fees as jurisdictional scheme payments that are subject to pass through arrangements via the annual distribution pricing process and are therefore no longer part of benchmarked opex.

In addition, the AER decided not to apply this OEF in Evoenergy's determination on the basis that there was incomplete data available from distributors on non-energy industry-specific taxes and levies. No additional data has been collected by the AER on this topic, and therefore this issue remains.

Due to the above factors, we do not consider it appropriate to apply a Taxes and Levies OEF in our determination.

### 3.2.5. Vegetation Management responsibility

## Proposal: Do not apply the Vegetation Management responsibility OEF as there is no basis for it

In the previous round of determinations, the AER developed a vegetation management responsibility OEF to reflect that in Victoria and South Australia responsibility for vegetation management sits with local councils rather than distributors in some parts of the network. While the OEF that is applied would be 0 for AusNet, nonetheless we want to raise concerns with the approach adopted by the AER for the following reasons:

- The OEF assumes AusNet enjoys an advantage in vegetation management opex due to councils performing 18% of vegetation management. However, while it is true that councils are responsible for cutting trees on council land in declared areas, AusNet is still responsible for clearing vegetation on customers' properties in the same location. Therefore, crews are still required to mobilise in declared areas, significantly eroding any potential cost benefit of these arrangements.
- Areas that councils are responsible for tend to be low bushfire risk areas rather than high bushfire risk areas; AusNet incurs higher unit rates for high bushfire risk areas, again reducing any opex advantage.
- AusNet is still required to inspect all assets to ensure compliance by local councils, under our general obligation under the Electricity Safety Act 1998 to ensure the safety and security of its entire distribution network.

### 3.2.6. Future treatment of emergency preparedness costs

## Proposal: Clarify the treatment of emergency preparedness costs in future benchmarking assessments

AusNet is proposing a step change in ongoing opex for the 2026031 period of $1.9m per year to enhance our preparedness and response capabilities to deal with extreme weather events, like storms. The driver of this step change has been:

- The very clear feedback from our customers who have experienced extreme weather events resulting in prolonged power outages during the current regulatory period;
- Our commitment to deliver the recommendations in the independent Post Incident Review of our performance during the February 2024 storms, carried out by Nous; and
- Reviews initiated by the Victorian Government, including the Network Resilience Review (May 2022) and Network Outage Review (August 2024), which set out clear expectations of increased activity and customer support.

While we consider increasing opex in this area is required as it enables us to better meet the needs of our customers, this activity will deteriorate our benchmarking position, as it will increase our opex (input) without impacting outputs. For this reason, we would welcome the AER's confirmation as to how this

opex will be treated for benchmarking purposes going forward – i.e. if the AER considers this opex should be deemed 'efficient' for benchmarking purposes. We suggest this could be included as part of the severe storm OEF we have proposed in section 3.2.1 of this document. This clarification will enable us to invest to meet the needs of our customers without being unduly concerned about the benchmarking implications, and associated risk of poor financial outcomes. For avoidance of doubt, if emergency preparedness costs are excluded from benchmarking, AusNet will continue to have an incentive to invest efficiently, as this opex will remain subject to the Efficiency Benefit Sharing Scheme.

# 3.3. Model specification concerns

We note that other distributors (including recently Evoenergy and Ergon) have raised a number of statistical concerns about the model specifications (see for example, Frontier Economics Opex Benchmarking Report for Ergon[13]). While we have not undertaken our own analysis, we agree with the sentiment that model misspecifications could be driving statistical issues in the models, and that a holistic review should occur of the models as soon as possible. Since these models were developed the cost drivers of the distributors have been changing, for example, export service provision and resilience are new cost drivers that were not considered at the time. In addition, customer energy usage and peak demand is being impacted by factors including energy efficiency developments and electrification, which could impact the drivers and/or weightings that should be applied to the model parameters.

[13] Accessed here: AER benchmarking of DNSP opex

# 4. Reviewing the 0.75 efficiency threshold

In its 2024 Annual Benchmarking Report the AER has indicated they will review the 0.75 threshold for assessing base opex efficiency in 2025-26. This is consistent with feedback from our panel that the current cut off point is too low and the AER should review it with the intent to increase it.

We are strongly of the view that, until the above issues are resolved, the 0.75 threshold should remain as is. This recognises the inaccuracies that exist in the current benchmarking approach, including those outlined above. As these issues are reviewed and addressed, and confidence in the benchmarking grows, then it may be appropriate to increase the cut-off, however a significant amount of review activity needs to occur before this is the case.

AusNet has faced significant uncertainty over whether its base opex will pass the AER's efficiency assessment, particularly as we have experienced large weather events that have driven very large, one-off costs (magnified by associated GSL payments). This uncertainty can impact business decision making – for example, when deciding whether to increase opex to improve preparedness for extreme weather events or establish additional account managers based on demand from our large C&I customers, as well as whether to adopt opex solutions instead of capex when a lower overall cost.

Reducing the benchmarking cut off without refining the accuracy of the benchmarking model, despite repeated and widespread industry calls for a review, both increases the degree of uncertainty faced, and increases the number of distributors who may face this uncertainty. This uncertainty can lead to sub-optimal expenditure decisions being made which are not in the interests of customers.

# Supporting Material

**Attachment 1** – AusNet Benchmarking Methodology Paper, 14 April 2023

**Other relevant material:** Various AusNet benchmarking submissions provided to the AER over the years are also relevant to this proposal, including those listed below.

| Consultation | Link to submission |
|---|---|
| **2024 Annual Benchmarking Report** | AusNet - Submission to 2024 AER draft distribution benchmarking report - 29 October 2024_0.pdf |
| **2023 Annual Benchmarking Report** | AusNet Services – Submission to 2023 AER draft distribution benchmarking report – 19 October 2023.pdf |
| **2022 Annual Benchmarking Report** | AusNet Services - Submission to 2022 AER draft distribution benchmarking report - 26 October 2022 \| Australian Energy Regulator (AER) |
| **2021 Annual Benchmarking Report** | Distribution - Submission - AusNet Services.pdf |
| **2020 Annual Benchmarking Report** | AER - 2020 distribution network service provider benchmarking report - November 2020.pdf |
| **2019 Annual Benchmarking Report** | D19-185522 AusNet Services submission to 2019 AER draft distribution benchmarking report.PDF |

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