

31 March 2023

Dr Kris Funston  
Executive General Manager  
Australian Energy Regulator  
GPO Box 3131  
Canberra ACT 2601

Dear Dr Funston

## **RE Network Information Requirements Review**

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Regulator (**AER**) regarding the preliminary Annual Information Orders (**Orders**) for transmission network service providers and electricity distributors.

TasNetworks, as the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner for Tasmania is focussed on delivering safe, secure and reliable electricity network services to our customers. As such, we support the introduction of the Orders to streamline the means by which the AER gathers information from regulated network businesses.

Whilst TasNetworks supports the introduction of the Orders, we have concerns about the implementation timeline. The AER is proposing to have the first reporting period be the 2023-24 financial year, requiring the current Regulatory Information Notices (**RINs**) to be revoked with one year remaining. With the final Orders being published in September 2023, TasNetworks will not know the reporting requirements for 2023-24 until at least three months into the period. This creates a risk related to the accurate capture of information and TasNetworks' preference is for the current RINs to run their course before the implementation of the Orders, allowing for the embedding of the information requirements contained in the Orders for both TNSPs and DNSPs before the reporting period begins.

TasNetworks supports the audit exceptions identified in the preliminary Orders, reducing the time and financial burden on Network Service Providers (**NSPs**). To

further reduce this burden TasNetworks seeks to extend the response data of the Orders to the end of November, five months after the end of the reporting period. Any information required by the AER early, such as the “Instances where GSL not met – indicative data”, can still be provided to the proposed timeframe in an unaudited state, with finalised audited data to be provided on or before 30 November.

TasNetworks questions the inclusion of safety incident reporting for both TNSPs and DNSPs. This information is currently reported to TasNetworks’ jurisdictional electrical safety regulator and the inefficient duplication of reporting would result in increased regulatory costs. There has been limited information provided on how the AER will use this data and it is unclear what benefits may be gained that will outweigh the added cost associated with the request.

TasNetworks notes the Orders have not included reporting on DNSPs Customer Service Incentive Schemes (**CSIS**). Whilst TasNetworks acknowledges each CSIS may require the reporting of different information we are of the position that this can still be reported through the Orders, without the need to issue numerous bespoke information requests. There is already the ability to provide free text fields in the preliminary Orders and TasNetworks would advocate that any differences in CSIS reporting be captured this way.

The preliminary “Data category workbook 05B – Service performance” for TNSPs does not currently include all information provided to the AER in TasNetworks’ annual Service Target Performance Incentive Scheme (**STPIS**) information submission. To avoid the need for further information requests TasNetworks suggests that “Data category workbook 05B” be aligned to the current AER STPIS information requirements.

If you have further queries regarding this submission, please contact [REDACTED], Revenue Reset Specialist at [REDACTED].

Yours sincerely

[REDACTED]

Chantal Hopwood

Head of Regulation