

National Electrical and Communications Association - Submission

Submission to the Australian Energy Regulator in regarding formal consultation for 'Network performance reporting for regulated electricity and gas networks'

October 2025

Introduction

The National Electrical and Communications Association (NECA) provide this submission in response to the invitation by the AER to comment on consultation for 'Network performance reporting for regulated electricity and gas networks'

NECA have been engaging with the AER for some time now, directly and via consultations such as this, to address aspects of the regulatory framework for Distribution Network Service Providers (DNSP's) that are insufficient or require improvement.

We welcome the current review and have made suggestions below that attempt to secure improved outcomes for energy consumers and communities with prudent and effective regulatory oversight of specific performance measures.

Overview

NECA is the peak body for Australia's electrical and communications industry, which employs 344,370 people and turns over more than \$82bn annually. NECA represents over 6,500 businesses performing works including the design, installation, and maintenance of electrical and electronic equipment in the construction, mining, air conditioning, refrigeration, manufacturing, communications, security, automation, and renewable energy sectors.

NECA has advocated on behalf of the electrotechnology industry for over 100 years and helps its members and industry operate in an efficient, safe, and regulatorily compliant manner. NECA represents the interests of electrical and communication businesses to all levels of government and in regulatory, legislative and industry development forums.

NECA members make an essential economic contribution – connecting businesses, homes, and infrastructure – encouraging investment, improving reliability and energy security, and delivering affordable, environmentally sustainable outcomes. The safety and reputation of the electrical industry is critical to tradespeople, consumers, and the community.

NECA also plays an integral role in the development of the next generation of Australia's electrical and communications tradespeople and contractors. Through its associated Group Training Organisations (GTOs) and Registered Training Organisations (RTOs), NECA offers employment and trade training to over 2000 apprentices and tradespeople

nationally. NECA is directly involved in the governance of Powering Skills Australia – the Jobs and Skills Council for this industry - via board representation and provides regular input to the development and maintenance of nationally recognised training packages and units of competency for use in our industry.

Submission

Our submission is limited to highlighting specific areas of performance for DNSP's that are not currently required but are critical comparative indicators of how DNSP's interact with and service the communities in which they are licensed to operate

NECA's concerns with respect to the operational performance of DNSP's relate primarily to delivery/responsiveness of

1. connection services.

Specifically,

- the average and/or median periods for the time taken between the date of issue of a response to connection enquiry (NER - <https://energy-rules.aemc.gov.au/ner/714/691189#5.3.3>) and the date of issue of a connection offer (NER - <https://energy-rules.aemc.gov.au/ner/714/691195#5.3.6>)

Separated into basic, standard, and negotiated connections.

And,

- the average and/or median periods for the time taken between the date of the connection offers and completion of network connections/modifications.

2. some alternative control services.

Specifically,

- the timely provision of safety advice to enquiries for working near network assets
- the average and/or median periods for the installation of tiger tails / visual markers after agreement with an applicant for those services.
- the average and/or medium cost of access permits / clearances to work for basic, moderate, and complicated switching scenarios.

The comparative performance aspects of DNSP business are not well understood or documented, but can have a profound impact on the ability of communities in their areas to attract investment and complete projects efficiently. Anecdotally, NECA's observations are that customers are much better served where they can engage directly with accredited designers and constructors (such as in NSW), as opposed to jurisdictions where such services have not been made contestable and customers are beholden to the capacity of the DNSP to provide those services at any particular time.

Similarly, timeliness in the provision safety advice and services for persons needing to work in the proximity of DNSP assets is a critical and relevant indicator of the degree to which DNSP's are operating effectively and responsibly in their communities.

With respect to the costs associated with access permits/clearances to work, we observe differing approaches and structures applied between DNSP's in their Ancillary Network Service schedules approved by the AER. For example,

- Endeavour Energy prescribe an extensive list of scenarios with an applicable charge for the arrangement and issue of access permits,
- whereas Ausgrid prescribe a fee for a basic permit and provide individual quotes using hourly rates for anything exceeding that.

In Ausgrid's case in particular, our members have observed and notified NECA of excessive quotes for relatively basic permits, far in excess of a figure that could be considered cost recovery.

The data from these particular metrics could provide genuinely valuable information to the AER and the governments in each jurisdiction about the performance of DNSP's in servicing and supporting Australian communities and businesses. In their absence, the ability of regulators and policy makers to make informed decisions is limited.

In conclusion

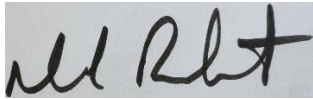
NECA appreciates the opportunity to contribute to this consultation and trusts that our contribution will be considered as a genuine attempt to assist the regulator in identifying and measuring critical aspects of DNSP performance.

To arrange NECA's further participation discuss any matter relating to the impact of energy network regulation on the electrotechnology industry, please contact NECA's

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Head of Government Relations and Regulatory Affairs, Kent Johns, at
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Yours faithfully,

A handwritten signature in black ink, appearing to read 'Neil Roberts', on a light grey background.

Neil Roberts
Director – Policy, Technical & Safety
National Electrical and Communications Association (NECA)