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AEMO

13 February 2026

To whom it may concern,

Re: Submission to consultation on AEMO's *Draft 2026 Integrated System Plan* (ISP).

Climateworks Centre bridges the gap between research and climate action, operating as an independent not-for-profit within Monash University. Climateworks accelerates ambitious, evidence-based action for net zero in Australia and Southeast Asia. Since 2018, the Australian Energy Market Operator (AEMO) has engaged CSIRO, supported by Climateworks, to conduct multi-sector modelling to quantify the dynamic influences that would shape electricity demand under different emissions reduction scenarios. This modelling continues to inform AEMO's planning and forecasting tools, including the 2026 Integrated System Plan (ISP).

Climateworks welcomes the *Draft 2026 ISP* which advances planning by applying a carbon-budget lens, improving how likelihood is considered, and publishing the inaugural Demand Side Factors Statement in Appendix A9. Together, these shifts make the *Draft 2026 ISP* more valuable for governments, investors, industry and communities by clarifying what is built, where flexibility lowers costs and how choices influence reliability and emissions.

Climateworks analysis of whole-of-economy, least-cost pathways in line with the Paris Agreement shows that renewable energy would produce nearly all electricity by 2040 (Climateworks Centre 2024). This aligns with the multi-sector modelling work undertaken with CSIRO since 2018 to support AEMO's planning and forecasting tools (Climateworks Centre 2024). The recommendations in this submission draw on insights from that process and aim to contribute to a robust and optimised Integrated System Plan (ISP). Our submission focuses on accelerating least-cost pathways by elevating demand-side and distribution solutions within the ISP.

Climateworks is recommending changes to the ISP through the AEMC Review process - we have not covered all those changes in this submission. This submission outlines a staged approach across the 2026 and later ISPs that clarifies how demand-side evidence informs Candidate Development Path (CDP) construction and Optimal Development Path (ODP) selection, expands targeted sensitivities and co-optimises distribution, flexible demand, storage and gas within consistent constraints.

Climateworks recommends the following in response to the questions raised in the consultation:

- Clarify how demand-side and distribution evidence inform CDP construction and ODP selection. In later years, expand CDP construction so the use of demand-side and distribution resources can be optimised alongside grid-scale assets.

- Strengthen contingency planning and publish guidance on when demand-side alternatives influence 'actionable project' timing. In later years, define decision points where non-network demand-side options reprioritise actionable projects.

- Commit to targeted demand-side sensitivities, integrated within CDP construction rather than treated as peripheral tests. In later years, seek to include in the NER an obligation for AEMO to produce the Demand Side Statement of Opportunity, specifying its purpose, content and publication frequency.

- Clarify how distribution-level options are reflected in cost-benefit tests and ODP assessment. In later years, co-optimise distribution upgrades and active demand management alongside transmission, storage and firming.

- Explain the gas development projections and estimated firming capability from flexible demand and storage. In later years, allow gas, flexible demand and storage to be considered equally within the CDP optimisation

- Publish available evidence on price-responsive behaviour and flexible-demand potential, with transparent assumptions. In later years, adopt a forecasting framework that aligns distribution-level outlooks with state and National Electricity Market (NEM)-wide forecasts using local-to-national methods.

The role of the demand side

A balanced focus on supply and demand delivers an effective and lower-cost transition. A national approach can integrate system planning, provide clear governance for demand-side measures and align policy and market settings to support investment. Stronger data, forecasting and valuation place demand-side resources on equal footing with supply-side options, while coordinated actions help reduce consumption, moderate electrification-driven growth and optimise existing assets.

Demand-side energy management brings these measures together by enabling coordinated actions across households, businesses and industry. When visible in planning and valued on equal footing with supply-side options, demand-side energy management can shape load profiles, reduce peak demand and improve utilisation of existing assets. Energy efficiency, electrification, demand response, flexibility, energy management and load shifting all help align demand with renewable supply, supporting more efficient system development.

Climateworks' modelling shows substantial energy savings across all sectors when demand-side measures are coordinated and estimates cumulative savings of 9,656 PJ between 2025 and 2050 (EEC 2025; Climateworks Centre 2025a). The built environment contributes 4,469 PJ, followed by industry and waste at 3,720 PJ. Annual savings could reach 249 PJ by 2030 and 594 PJ by 2050.

These savings can lower electricity bills for households and businesses, ease pressure on infrastructure and avoid emissions from fossil generation. They can also reshape load profiles, reduce peaks and improve utilisation of existing assets, which supports reliability as coal retires and renewable generation expands.

TABLE 1: ENERGY SAVINGS FROM DEMAND-SIDE MEASURES (ENERGY EFFICIENCY) BY SECTORS (PJ)

Sectors	Cumulative (2025–2050)	2030	2035	2040	2045	2050
Agriculture and Land	49	3	1	1	2	2
Built Environment	4,469	124	161	199	224	246
Industry and Waste	3,720	79	115	158	204	270
Resources	1,417	43	50	58	68	75
Total	9,656	249	328	416	498	594

Sectoral breakdowns reinforce the scale of potential (Table 1):

- Built Environment: annual savings rise from 124 PJ in 2030 to 246 PJ in 2050, driven by efficient appliances, thermal shell upgrades and demand-responsive systems.
- Industry and Waste: annual savings rise from 79 PJ in 2030 to 270 PJ in 2050, reflecting process optimisation, electrification and flexible industrial loads.

Together, these represent a sizable resource that, when visible and properly valued in system planning, can reduce the scale and cost of new supply and network investments.

Climateworks will be pleased to provide further insights in writing or through meetings, where helpful.

Terms in this submission

The terms below are used in this submission. Here we set out definitions for consistency in language and why we think these parts of the system are important.

Demand Side Resources (DSR) refer to actions, technologies or programs that modify electricity demand in response to system needs or price signals. This includes consumer energy resources (CER), distributed resources, demand flexibility, electrification and energy efficiency.

Why this matters: DSR can reduce peak demand, lower system costs, defer network investment and improve reliability while supporting decarbonisation.

Consumer Energy Resources (CER) are small-scale, behind-the-meter assets owned by consumers, including rooftop solar PV, batteries, electric vehicles, smart appliances and controllable loads.

Why this matters: CER can generate, store or shift electricity use and increasingly participate in markets through aggregation, providing essential system services, flexibility and emissions reductions.

Distribution Networks are lower-voltage electricity systems that deliver power from high-voltage transmission networks to homes, businesses and communities. Managed by Distribution Network Service Providers (DNSPs), these networks are increasingly supporting distributed generation, energy storage and flexible demand.

Why this matters: New planning, data management, and operational strategies will improve accommodation of these changes while ensuring reliability and affordability.

Optimal Development Path (ODP) is AEMO's preferred sequence of generation, storage and transmission investments identified in the ISP. It represents the least-cost pathway to meet forecast energy demand and reliability standards under defined scenarios, while accounting for emissions trajectories, technology costs and system security requirements. It is chosen from a range of Candidate Development Paths (CDPs).

Why this matters: The ODP is an opportunity to reveal system-wide trade-offs by testing how different combinations of generation, storage, transmission and demand-side resources can deliver reliability at the lowest cost.

The Demand Side Opportunity Outlook (DSOO) is a proposed planning and information statement that identifies, quantifies and tracks demand-side opportunities, such as demand response, flexible load and electrification.

Why this matters: A DSOO could complement supply-side planning by improving visibility of demand-side gaps and opportunities to inform future investment and support integration of demand flexibility into system planning. A DSOO also has the potential to reduce expenditure on supply-side infrastructure (generation, transmission and distribution).

Recommendations

1. Optimal development path selection

Climateworks recommends:	
2026	**In later years**
Clarify how demand-side and distribution evidence inform CDP construction and ODP selection.	Expand CDP construction so the use of demand-side and distribution resources can be optimised alongside grid-scale assets.

The problem to solve: The current ODP framework optimises only grid-scale assets, limiting the model's ability to select demand-side resources that support reliability, affordability and emissions reduction. Incorporating demand-side and distribution resources as selectable substitutes broadens the model's capacity to identify lower-cost, lower-risk portfolios.

In the *Draft 2026 ISP*, demand-side resources and distribution upgrades appear as assumptions about net demand under scenarios rather than options the model can select. When the model cannot choose a demand-side alternative in the same way it selects a new supply-side asset, the least-cost test remains incomplete. Elevating demand-side and distribution resources from assumptions to selectable candidates enables the ISP to reveal whether flexibility or targeted distribution upgrades

can balance supply and demand at lower cost and lower risk while maintaining reliability (AEMO 2025b; AER 2026). As long as demand-side and distribution resources remain assumptions rather than candidate investments, the ISP cannot fully identify the lowest-cost portfolio nor assess whether major supply-side assets could be deferred or right-sized.

Climateworks' Paris-aligned, least-cost pathways for Australia show electricity reaching 83–90 per cent renewables by 2030 and nearly all electricity generated in 2050 (Climateworks Centre 2023a, 2023b). If planning for transition to near-zero emissions in electricity does not allow demand-side and distribution solutions to act as competitive substitutes, the plan risks over-sizing firming and network assets and missing faster, cheaper options.

The *Draft 2026 ISP* notes that ageing coal units are becoming less reliable ahead of retirement, with unplanned outages around 7 per cent between 2027 and 2035 and capacity losses of 17 per cent. As coal reliability declines, the value of fast-responding, flexible demand-side resources increases, particularly where they can support security at lower cost and faster delivery than large assets.

While CER and distribution-level investments are DNSP-led, AEMO can still reflect their aggregate system value by incorporating them as selectable options within CDP development. This does not imply AEMO directs DNSP investment; rather, it ensures system-wide planning captures the value of local solutions.

The proposed change (2026): Clearly identify which Appendix A9 inputs materially influenced ODP decisions, how they affected candidate ranking, and where current methods limited shortlisting of demand-side options. Explain how Appendix A9 informs choices between candidate investments, including indicative cost and performance ranges for orchestrated CER, industrial demand response and local hosting upgrades. Outline the method enhancements planned for later years, such as revised candidate construction rules and location-specific cost curves for hosting capacity, voltage and flexibility (AEMO 2025b; AER 2026).

The proposed change (later years): Incorporate demand-side and distribution resources directly into CDP construction so the optimisation engine can select them alongside transmission, storage and generation when determining the ODP. Parameters can be grounded in the Demand-side Factors Statement and other AEMO evidence. Treating these options on equal footing with supply-side assets enables consistent identification of the lowest-cost, lowest-risk mix (AEMO 2025b).

Why this improves outcomes: Completing the least-cost test allows the model to select all credible solutions. This reduces the risk of oversizing large assets, brings forward benefits where demand-side options deploy faster, and directs investment where it is most effective. It also gives customers a visible role in the transition, which encourages participation and supports a durable plan (Climateworks Centre 2023a; AEMO 2025a).

2. Timing and treatment of actionable projects

Climateworks recommends:	
2026	**In later years**
Strengthen contingency planning and publish guidance on when demand-side alternatives influence 'actionable project' timing.	Define decision points where non-network demand-side options reprioritise actionable projects.

The problem to solve: In a fast-moving system with long-lived assets, anticipatory investment helps ensure supply keeps pace with evolving demand and provides confidence for investors. Uncertainty

around the timing, scale and location of new loads – including industrial expansion, hydrogen production, data centres and electrification, creates a risk that the electricity system is sized for loads that do not materialise or, conversely, is not meeting new demand reliably. Therefore, the ability to re-priorise actionable projects allows reflection of changed circumstances.

The proposed change (2026): Publish guidance on how and when demand-side options can defer, reduce or reprioritise supply-side investments. Draw on parameters in Appendix A9 and indicate where coordinated CER and demand response are likely to shift timing. During consultation, provide a short addendum Table for selected actionable or preparatory projects that shows how different levels of coordination alter indicative timing, staging or sizing, without rerunning the full ISP model (AEMO 2025b).

The proposed change (later years): Embed transparent decision points within the ISP framework that explain where non-network demand-side alternatives become material to the timing, sizing or sequencing of actionable projects. Operate these triggers within the ISP. This would include Regulatory Investment Test for Transmission (RIT-T) governance settings to support AER decisions and Transmission Network Service Provider (TNSP) sequencing. This transparency helps protect consumers from both underbuild and overbuild risk, given costs of transmission and generation are socialised (AEMO 2025b; AER 2026).

Why this improves outcomes: Establishing the DSOO within the NER provides a stable and enduring source of information on flexible demand. This visibility supports efficient investment, aligns regional and national planning and enables governments, investors and aggregators to act with greater confidence.

3. Testing the robustness of CDPs and investment decisions

Climateworks recommends:	
2026	**In later years**
Commit to targeted demand-side sensitivities, integrated within CDP construction rather than treated as peripheral tests.	Seek to include in the NER an obligation for AEMO to produce the Demand Side Statement of Opportunity, specifying its purpose, content and publication frequency. Integrate demand-side sensitivities into CDP construction, which then informs the ODP selection.

The problem to solve: The *Draft 2026 ISP*, ESOO and Appendix A9 have increased the available demand-side information. The announcement by the Australian Government in September 2025 that a demand-side statement of opportunities would be developed will ensure demand-side measures are valued in helping the system meet needs at a lower cost. The DSOO would complement the ESOO and GSOO by providing forward-looking information on how investment can bring forward additional demand-side resources (AEMC 2024; Climateworks Centre 2025c).

The proposed change (2026): Increase the transparency of demand-side evidence and commit to developing targeted sensitivities. In parallel with developing the DSOO, AEMO could strengthen system planning by improving how demand-side sensitivities are defined and used.

The proposed change (later years): Locate the DSOO within the ISP family to ensure demand-side insights inform long-term system development pathways, rather than only short-term adequacy assessments. AEMO could also develop targeted sensitivities to explore demand-side potential. This

would allow the development of CDPs that incorporate how coordinated CER, industrial demand response, or electrification trajectories materially change system expansion requirements. While CER investments are participant-led, their aggregate behaviour can materially shape system needs and therefore warrants inclusion in CDP sensitivity design. Sensitivities might include:

- A high-CER coordination case across multiple regions to show the system effects of improved orchestration.
- An industrial demand response case that treats demand response as a peak-supply substitute with reasonable performance parameters to test how that resource changes portfolio choices.
- An accelerated electrification case that embeds managed charging and thermal storage to test growth in flexible demand against network and firming needs. This could include a 'Home Battery Scheme' sensitivity, testing how orchestrated behind-the-meter batteries reduce peak demand, shift load profiles and defer network investment.

These sensitivities are most useful when they are system-level rather than purely technology-specific, because they reveal how demand-side resources influence transmission, storage and firming. They can be delivered as light-touch analyses using existing inputs and published as a short technical note. Embedding these sensitivities within the CDP modelling framework, rather than treating them as peripheral tests, enables systematic appraisal of demand-side options as genuine alternatives to network or generation investment.

Why this improves outcomes: NER anchoring ensures the DSOO persists beyond changing policy priorities or funding cycles. A standing DSOO gives planners and investors a single, dependable place to see when, where and how much flexible demand is available. It improves the efficiency of investment by putting demand-side options beside supply-side opportunities in the language and formats planners use. This can unleash entrepreneurial activity and crowd-in private capital. It also complements Enhanced Locational Information and regional planning by aligning precinct-scale choices with what is best at a system-wide level (AEMO 2025c; Climateworks Centre 2025c). Embedding the DSOO in the NER ensures durability across planning cycles, providing investors, aggregators and governments with stable information to guide commercial and policy decisions.

4. Does the ODP identify and leverage distribution opportunities

Climateworks recommends:	
2026	**In later years**
Clarify how distribution-level options are reflected in cost-benefit tests and ODP assessment.	Co-optimise distribution upgrades and active demand management alongside transmission, storage and firming.

The problem to solve: The *Draft 2026 ISP* recognises distribution system opportunities and discusses consumer and distribution actions. What is missing is a transparent pathway for distribution upgrades and active demand management to be treated as explicit options within CDP construction, informing eventual ODP selection. Current data and governance settings mean distribution solutions cannot yet be optimised in CDP construction, reinforcing the importance of a staged approach. This does not imply AEMO undertakes distribution planning; rather, the ISP can reflect where distribution-level options provide system-wide benefits.

Meanwhile, the cost environment for major transmission has shifted, and the process to select the ODP is now supported by improved land-use and locational tools. It is sensible to allow distribution-led and demand-side solutions to compete head-to-head with large projects, particularly where they can

deliver the same reliability faster or at lower cost. In many cases, targeted distribution upgrades can remove or delay the underlying case for a larger transmission asset (AEMO 2025c, 2025d; Climateworks Centre 2025d).

The proposed change (later years): Publish a short explanation of how distribution investments referenced in Appendix A9 are represented in Appendix A6 cost-benefit thresholds, and whether any distribution-focused candidates were tested against transmission or firming options. This clarifies how distribution-level evidence informs national planning without replacing DNSP planning.

The proposed change (later years): Co-optimise distribution upgrades and active demand management alongside transmission, storage and firming. Parameterise industrial demand response and other active demand measures with realistic notice times, durations and performance so they can be dispatched as substitutes where appropriate. Use indicators such as curtailment, congestion, hosting capacity and Marginal Loss Factor (MLF) robustness to identify locations where distribution-level solutions create the highest system value. Implementation remains with DNSPs, while AEMO can reflect distribution options in system planning where they influence long-term development pathways.

Why this improves outcomes: Letting the demand side compete on equal footing helps reveal least-cost options that lower bills, accelerate delivery and improve social acceptance. It also builds a more diversified portfolio and, therefore, is more robust to uncertainty in future demand patterns. In industrial zones and growth corridors, distribution-plus-flexibility may right-size or defer transmission while maintaining reliability and emissions goals. This represents an evolution of CDP development rules, rather than a change to the purpose of the ODP itself (AEMO 2025c, 2025d).

5. Gas development projections adequacy

Climateworks recommends:	
2026	**In later years**
Explain the gas development projections and estimated firming capability from flexible demand and storage.	Allow gas, flexible demand and storage to compete directly within CDP optimisation.

The problem to solve: Gas development projections are inputs rather than optimised decisions, so transparency is important for understanding how they interact with firming requirements. The *Draft 2026 ISP* sets out a role for flexible gas-powered generation during the transition and outlines how projections influence supply portfolios. As CER and small-scale batteries contribute more consistently during peak periods, system reliance on gas-powered generation may materially reduce. The ISP could make this changing role visible and test it directly in optimisation (AEMO 2025a; Climateworks Centre 2025e).

The proposed change (2026): Explain how Appendix A10 gas projections are derived and estimate the extent to which firming can be delivered by orchestrated small batteries, demand response, managed charging and community storage.

The proposed change (later years): Restructure candidate design and optimisation so gas, large-scale storage, orchestrated small-scale storage and flexible demand compete directly under the same reliability and carbon constraints. Embedding a gas-substitution case within CDP construction clarifies relative performance and reduces lock-in risk to long-lived gas infrastructure (Climateworks Centre 2025e, 2025f).

Why this improves outcomes: Testing gas against demand-side alternatives reveals emissions impacts and the true least-cost portfolio and provides a clearer signal about the scale and duration of gas in the system. It supports prudent investment by avoiding reliance on long-lived gas infrastructure, while still ensuring reliability throughout the energy transition (AEMO 2025a; Climateworks Centre 2023a).

Demand-side solutions act as supply substitutes. For example, demand response can target the specific peak hours that drive reliability risk and trigger augmentation, and can be contracted with realistic notice windows, durations and performance factors comparable to other firming resources. Demand-side measures complement CER orchestration and storage during long, dark, still conditions and scale through existing market frameworks. Lower-cost, non-emitting demand shaping reduces price volatility and reliance on gas. Allowing all firming options to compete under uniform reliability, emissions and cost constraints reveals the true least-cost pathway and lowers lock-in risks. This approach advances the National Energy Objectives by promoting efficient investment, minimising costs to consumers and supporting environmental outcomes.

6. Feedback on the Addendum to the 2025 IASR

Climateworks recommends:	
2026	**In later years**
Publish available evidence on price-responsive behaviour and flexible-demand potential, with transparent assumptions.	Adopt a forecasting framework that aligns distribution-level outlooks with state and National Electricity Market (NEM)-wide forecasts using local-to-national methods.

The problem to solve: Two forecasting gaps are most material. First, the behavioural response of households and businesses to prices and orchestration signals remains insufficiently represented. Second, the aggregate and locational behaviour of orchestrated CER is not forecast systematically. Addressing both gaps is essential for accurate sizing and timing of future network and supply investments. This will help with right-sizing new supply and network assets as the size, timing and locational effects of flexibility and demand-side management are captured (Climateworks Centre 2025b; AEMO 2025c).

The proposed change (2026): Build on the Inputs, Assumptions and Scenarios Report (IASR) Addendum by publishing available evidence on price-responsive behaviour and regional estimates of flexible-demand potential using program, trial and monitoring data. Clearly disclose data sources, assumptions, modelling approaches and material uncertainties, and show how estimates interact with planned network and generation investments. This transparency supports informed scrutiny and coordinated action by governments, regulators and market participants.

The proposed change (later years): Adopt a forecasting approach that aligns distribution-level projections with state and NEM-wide outcomes so local forecasts roll up cleanly to national totals. Enhanced Locational Information, combined with spatial land-use and industrial data, can reflect precinct development and place-based transition pathways. Starting forecasts at the distribution level and rolling them up with consistent assumptions improves the accuracy of system planning.

Why this improves outcomes: Stronger visibility of price-responsive behaviour, flexible-demand potential and CER orchestration will materially improve the transparency and accessibility of AEMO's forecasting methodologies. Publishing clear, plain-language explanations of how demand growth, flexibility and orchestration are represented, how uncertainty is treated, and how alternative assumptions influence system outcomes will enable informed scrutiny by governments, regulators and

market participants. Greater transparency will also support more coordinated decision-making across jurisdictions and help maintain social licence for system planning.

Stronger engagement with governments, regulators, industry, researchers and communities can deepen understanding of forecast methods and their implications for investment, affordability and emissions. This clarity strengthens trust in the ISP and builds confidence that the plan reflects real-world demand drivers.

When local load and flexibility patterns are connected to system-wide planning, the ISP can integrate flexibility with greater confidence and reduce the risk of overbuild or underbuild. Aligning distribution-level and NEM-wide forecasts also strengthens industrial-zone and distribution level energy planning. It would link precinct-scale development and system perspectives. This approach provides a more robust foundation for future planning cycles – including a rules-anchored DSOO – by ensuring that demand-side contributions are visible, credible and consistently valued. This dual perspective would improve the accuracy and credibility of ISP pathways and help identify the most cost-effective contributions from the demand side (AEMO 2025c; Climateworks Centre 2025c).

Yours sincerely,

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