Before You Dig Australia
Level 5, 447 Collins Street
Melbourne VIC 3000

2 October 2026

Executive General Manager, Network Regulation
Australian Energy Regulator
By email: capex@aer.gov.au

Before You Dig Australia submission to the Australian Energy Regulator's **draft Network Resilience Guidelines**

Before You Dig Australia (BYDA) appreciates the opportunity to respond to the draft Network Resilience Guidelines and explanatory statement, published September 2026. BYDA made a detailed submission to the June 2026 consultation paper and we welcome the AER's engagement with that submission, as reflected in the explanatory statement's summary of stakeholder feedback.

However, we are concerned that the draft Guidelines in their current form represent a missed opportunity to comprehensively cover additional resilience risks – such as excavation damage to energy infrastructure - beyond specifically severe weather events that cause outages.

We acknowledge the catalyst for this consultation and update to the Guidelines are the challenges associated with extreme weather and related climate change concerns. However, we urge the Regulator to reconsider our core recommendations on the operative principles that will determine how resilience expenditure is actually assessed, before the Guidelines are finalised.

Issue 1: The 'weather-only' definition of network resilience excludes excavation damage

Principle 1 confines network resilience to "prolonged outages caused by severe weather events," and the explanatory statement goes further, stating that resilience expenditure is deliberately distinguished from "other nation-wide risks (unrelated to weather)", with non-weather risks left to be addressed "in other expenditure categories."

This does not engage with BYDA's central submission: that undergrounding – the AER's own preferred resilience measure – transfers risk from weather onto a different, persistent threat of excavation damage, and that this risk rises precisely during the post-weather disaster reconstruction the guidelines are designed to support.

Treating excavation damage as categorically "non-weather" and therefore out of scope does not reflect the lived experience of assets struck by excavators while being rebuilt after a storm or bushfire. A network hardened against weather but struck by an excavator has not delivered the consumer outcome the resilience expenditure was approved to secure.

BYDA's position:

We are not asking the AER to expand the expenditure factors beyond the NER rule. We are asking that the definition of network resilience explicitly acknowledges that the resilience of underground assets depends on their protection from ground disturbance damage, both in ordinary operation and during post-event reconstruction; ensuring weather-driven resilience investments are assessed with full visibility of the risks they create as well as mitigate.

Issue 2: Interdependency-mapping is being assessed without a data quality foundation

Section 3.3 of the explanatory statement declines to reflect critical infrastructure interdependencies in the definition itself, reasoning that a DNSP's responsibilities under the NER "do not include responsibilities to other essential service providers."

BYDA accepts that the definition must stay anchored to network services as defined in the NER. Our concern is narrower and remains unaddressed: any interdependency mapping the guidelines do encourage, including the community-resilience information-sharing the AER does support, is only as reliable as the underlying asset location data.

Electricity, telecommunications and water assets routinely share trenches, easements and road corridors. Interdependency mapping built on Quality Level D (approximate, unverified) location data will mis-state those dependencies and understate cascading risk, undermining the very outcome Principle 2's information-sharing expenditure is meant to achieve.

BYDA's position:

Where the guidelines recognise or fund information-sharing and interdependency initiatives, they should require that mapping be underpinned by AS 5488-aligned location data and interoperable data models such as OGC MUDDI. This is a data-quality safeguard on an initiative the AER already supports, not an expansion of scope.

Why this matters

BYDA is Australia's national referral service for underground utility asset location information, covering over 850 asset owner members and processing 2.7 million location requests a year. More than 15,000 reported utility strikes occur annually, at an estimated cost to the economy exceeding $4.6 billion[1]. As electricity networks move underground at pace to meet weather resilience targets, the exposure of those assets to excavation damage will only grow, as will the gap in a resilience framework that does not recognise it.

We recognise the AER has a demanding timeline and a broad stakeholder base to balance. But we consider our two core assertions – that excavation damage is a material network resilience risk in its own right, and that any interdependency mapping needs an AS 5488 data-quality foundation to be reliable – go to the core of the guidelines' intended outcome, not a peripheral add-on.

We ask the AER to genuinely reconsider our recommendations, rather than treat them as addressed through acknowledgement alone.

We would welcome a meeting with the Regulator to discuss this response, and remain ready to provide further evidence, data or expert input at any stage.

Mell Greenall CEO,
Before You Dig Australia
Mell.Greenall@byda.com.au
0407 166 706

1 https://www.byda.com.au/wp-content/uploads/2026/02/BYDA-Economic-Assessment-of-Utility-Strikes-in-Australia-2024.pdf