CITIPOWER Powercor AUSTRALIA united energy

PROPOSED OPERATING MODEL

ELECTRIC VEHICLE CHARGING INFRASTRUCTURE TRIAL

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1. Proposed operating model

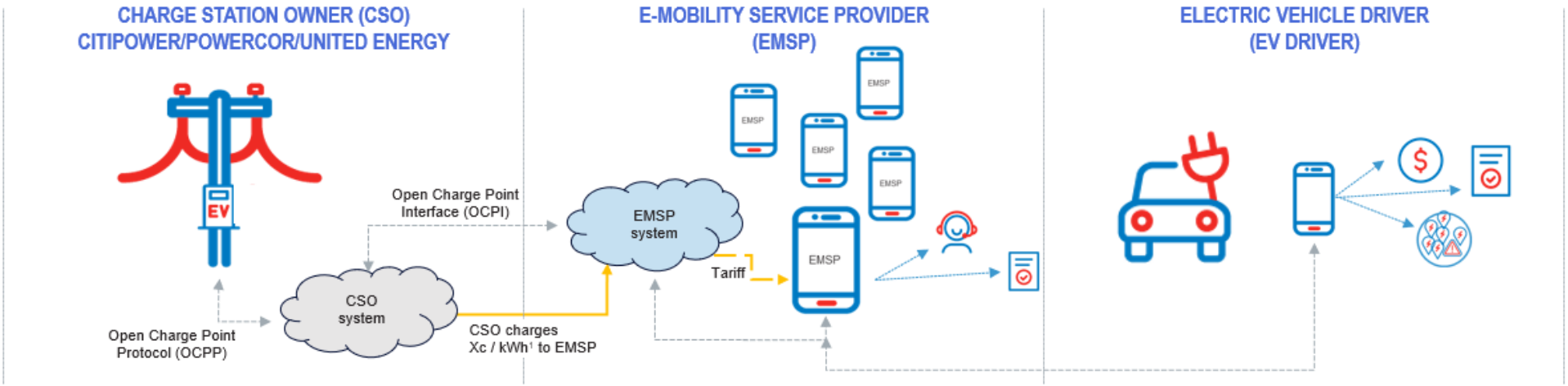

FIGURE 1: OPERATING MODEL SHOWING CPU (AS CSO) INTERACTING WITH MULTIPLE EMSPS VIA OCPP/OCPI PROTOCOLS. EMSPS MANAGE THE INTERFACE AND BILLING, WHILE EV DRIVERS ACCESS CHARGERS THROUGH VARIOUS ROAMING PLATFORMS.

CitiPower, Powercor and United Energy's (CPU's) proposed operating model shows our role as the charge station owner (CSO), operating a network of kerbside electric vehicle charging infrastructure (EVCI) using standardised, open protocols. Each kerbside EVCI is linked to a single national meter identifier (NMI), with energy use billed to CPU. Using the open charge point interface (OCPI), CPU pass through the retail chargers to the applicable E-Mobility service provider (EMSP). Through the OCPI electric vehicle (EV) drivers can have access to multiple EMSPs. The EMSP will manage billing and the customer relationship, while anonymised usage data is shared with the CSO to inform network planning and evaluate trial performance.

2. Clarifications on the proposed operating model

2.1.1 Supporting competition and consumer choice via a multi-EMSP model

Although each kerbside EVCI has a single NMI, and financially responsible market participant (FRMP), our roaming model enables EV users to access services through multiple EMSPs. This is achieved via the OCPI, which allows interoperability between EMSPs—even when the underlying kerbside EVCI is registered under a single retail contract.

Under the proposal, CPU will engage an electricity retailer to provide the retail services to CPU. Using OCPI, CPU will pass through these retail rates to the EMSPs who wish to be a part of the trial. The EMSPs will be responsible for setting of customer charging rates, managing billing and the customer relationship, via their own management systems and apps. However, all EMSPs can access the same charging infrastructure through standard roaming agreements. This ensures that end users are not limited to a single charging application or provider, and can charge using credentials from their preferred EMSP, supporting consumer choice, increased accessibility to EVCI and a competitive market.

This is functionally equivalent to how roaming works in telecommunications — where a customer's primary provider allows access to infrastructure managed by another provider under transparent and standardised terms.

Having multiple EMSPs available at a charging site will enable greater competition for the consumer in the same way, energy retailers compete today. This increased competition will lead to cheaper charging rates to consumers and increased accessibility to EVCI.

2.1.2 Leasing kerbside EVCI to CPOs in a multi-EMSP framework

Under the trial, we retain ownership of kerbside EV charging infrastructure, but will partner with multiple EMSPs, who act as the customer-facing charge point operators (CPOs). These EMSPs effectively 'lease' commercial access to the kerbside EVCI through service agreements that allow them to:

- set retail tariffs for EV users
- manage customer relationships and billing and
- access kerbside EV charger data via application programming interfaces (APIs) (e.g., OCPI and OCPP).

Because the EMSPs will access the kerbside EVCI via a platform built on open standards, multiple EMSPs can be supported without hardware duplication or asset divestment. This model separates asset ownership from service provision, allowing competition at the service layer without fragmenting infrastructure ownership or increasing duplication.

2.1.3 Integration with dynamic demand management

The proposed model integrates dynamic demand management by enabling tariff responsiveness based on system conditions. Specifically:

- a flat-rate electricity usage tariff is charged to EMSPs
- during Australian Energy Market Operator (AEMO) declared minimum demand events, we may reduce this tariff to incentivise load uptake, supporting grid stability. Over time this capability may be extended to local network constraints.

While the kerbside EVCIs will not initially implement active demand response (i.e. interrupting or modulating charging), our pricing team will be considering a variety of potential new tariffs that can better manage more broadly constraints on low voltage network across our networks.

2.1.4 Our cost advantages in hardware procurement and maintenance

We consider the trial is likely to deliver cost advantages through:

- ***exercise of economies of scope***: we have extensive asset management footprint and a workforce familiar with managing electrical infrastructure, minimising installation costs and prudently and efficiently maintaining electrical assets
- ***utilisation of existing in-house capabilities***: the majority of maintenance (pole works, cabling, fault response) will be handled by our existing field crews and when needed we can utilise our extensive Registered Electrical Contractor (REC) panel that is located across our distribution networks
- ***experience in procurement at scale***: as an established utility operator, we can leverage existing procurement frameworks and relationships to source EVCI hardware at the most competitive prices
- ***expertise in software support***: the OCPP platform will be supported by vendor-managed software, with API integration maintained by our in-house digital team. Specialised software maintenance or firmware upgrades will be procured from third-party providers as required.

We firmly believe that cost advantages above, coupled with the flexibility and choice being provided to EV drivers, will deliver a more efficient and reliable service, meeting or exceeding their current experiences without excessive overheads or specialist contract management complexity.

2.1.5 Site selection methodology and pole suitability

Our site selection strategy is driven by:

- EV registration density, using publicly available postcode-level data to prioritise areas with unmet charging needs
- kerbside coverage gaps, particularly in inner and middle suburbs where off-street parking is limited, and kerbside charging is most required
- pole asset suitability, leveraging our internal asset management systems to assess which poles are structurally and electrically suitable for hosting EVCI.

While locations like Bendigo have higher rates of off-street parking, they are still being considered as part of a diversified trial mix to understand different usage patterns and economic profiles across metropolitan and regional contexts.

Pole selection criteria (from a technical perspective) has been developed in conjunction with third-party providers to assist them with initial site selection prior to submitting any application.

We are fully aware of pending connection applications from third-party kerbside EVCI providers and are managing these in parallel with our proposed trial. No specific sites are locked in (or have been assessed), and our approach ensures third-party kerbside EVCI proposals are not precluded or deprioritised. If anything, the data gathered through this trial will inform and enable more efficient deployment of future third-party kerbside EVCI sites.

For further information visit:

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