



11 June 2025

Ms Stephanie Jolly
Executive General Manager, Consumer, Policy and Markets Division
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Dear Ms Jolly

Consultation paper – CPU Ring-Fencing Waiver for EV Charging Infrastructure

AEMO welcomes the opportunity to respond to the Australian Energy Regulator's (AER) consultation paper on the application by CitiPower, Powercor, and United Energy (CPU) for a ring-fencing waiver to enable the deployment of 100 kerbside electric vehicle (EV) chargers across CPU's distribution areas on a trial basis.

AEMO considers that a broad and diverse range of EV charging infrastructure will be necessary to meet the equally diverse charging needs of individual and business EV owners, thereby supporting increased levels of EV adoption. Kerbside charging, alongside commercial charging facilities and private charging at premises, can play a critical role in establishing a comprehensive EV charging ecosystem to support the transition to electrified transport.

Response to Questions in the Consultation Paper:

Question 1 – *Do the current dynamics of the markets suggest a thriving and competitive marketplace?*

Kerbside charging infrastructure is still emerging. Recent initiatives by market participants, such as the recently approved PLUS ES trial waiver¹, demonstrate that trials are primarily intended to generate insights that inform future deployment.

A key barrier to efficient deployment, as noted in the PLUS ES trial, has been the inability to use innovative metering technologies for kerbside EV charging. This barrier will be addressed with the commencement of Schedule 2 of National Electricity Amendment (Unlocking CER benefits through flexible trading) Rule 2024 on 31 May 2026, which introduces type 9 metering installations tailored for applications such as kerbside EV chargers.

Additional impediments may still exist, highlighting the value of conducting trials across various technologies, locations, and installation types to better understand and address market barriers and inform future policy and framework development.

Question 3 – *What are your views on the potential benefits that may be gained from CPU's trial, including for network learnings?*

Unlike the PLUS ES trial, CPU's proposal is unlikely to contribute to the development and implementation of small-form, NEM-compliant metering systems for kerbside EV chargers, as it will utilise traditional metering within the Victorian Advanced Metering Infrastructure (VIC AMI) framework. However, the trial may still offer valuable insights into housing and connection configurations relevant to broader infrastructure planning, and

¹ <https://www.aer.gov.au/news/articles/news-releases/aer-grants-trial-waiver-innovative-kerbside-ev-chargers>

act as an input into the Victorian service and installation rules that assist participants and consumer appointed agents meet their electricity supply obligations.

Utilising existing distribution network service provider (DNSP) infrastructure, such as kerbside assets with an existing electricity supply, such as streetlighting poles, may offer an efficient pathway to EV charger deployment. These assets are already connected to the network and maintained for a primary purpose, providing a strong foundation for dual-use applications.

However, unlike typical customer connections where the DNSP's role ends at the point of supply, DNSPs remain responsible for assets such as streetlighting poles. Any additional equipment installed on these assets must operate within the DNSP's controlled environment. For example, installation, maintenance, and repair activities are generally carried out by the DNSP, with restricted access for safety and operational reasons.

If the use of such infrastructure for kerbside EV charging is considered desirable, it would be prudent to ensure that any secondary equipment (e.g. EV chargers) is managed under similar arrangements to maintain asset integrity and compliance with regulatory obligations.

Should the trial proceed, insights from its implementation – whether confirming or challenging these assumptions – could be highly valuable.

Question 5 – *What do you view as the potential risks to competition from CPU's proposed trial?*

Each EV charging point will need to be associated with a connection point and a National Metering Identifier (NMI) in market systems, and the relevant roles – financially responsible market participant (FRMP), metering coordinator, metering provider, and metering data provider – must be appointed at each NMI, in addition to the DNSP.

AEMO notes CPU's supplementary submission indicates their intention to perform the DNSP and all three metering roles under the VIC AMI framework. They also propose to act as the customer at the connection points. This would enable CPU to appoint the FRMP and on-sell energy to multiple charging entities, who would then bill the end users.

If this model were adopted, it appears CPU may need to apply for an exemption under the AER's Exempt Selling Guideline or register as a Market Customer. This arrangement appears complex and atypical, and alternative approaches may be more suitable for a trial. For example, a simpler model could involve the charge point operator being the customer and appointing the FRMP, with CPU remaining responsible for the installation and maintenance of the physical infrastructure. Alternatively, AEMO is open to working collaboratively with CPU and the AER to explore more practical options within the trial framework, including approaches that could facilitate participation by multiple FRMPs at the proposed charging points.

AEMO looks forward to continuing its collaboration with the AER and other stakeholders on this consultation. Should you wish to discuss any of the matters raised in this submission, please contact Hannah Heath, Group Manager – Strategic Market Reform, at [REDACTED]

Yours sincerely,



Temay Rigzin
Acting Executive Group Manager – Policy & Corporate Affairs (07/06/2025 – 12/06/2025)