Connected Kerb

Submission to the Australian Energy Regulator (AER)

Re: Waiver Application by CityPower, Powercor, and United Energy (CPU) for Deployment of Kerbside EV Chargers

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Executive Summary

Beyond the obvious transportation outcome, Electric vehicles (EVs), when effectively integrated, will significantly improve both capital and revenue efficiency across the electricity system.

Unlike other industry sectors, the electricity system operates within a regulated framework, not by preference but by necessity. DNSPs are geographic monopolies because delivering electricity infrastructure safely, efficiently, and fairly requires coordination that only regulated entities can provide. While this structure imposes rules and constraints, many of them are essential to the system's long-term security and reliability. Rather than treating this as a barrier, we consider this to be a strength. It enables shared investment, avoids duplication, and supports deliberate, long-term planning.

Planning the optimal framework and infrastructure for EVs—both immediate and long-term—must recognise their role as consumer energy resources (CERs) and ensure this is aligned with and optimised across the electricity system.

As CERs, EVs present a different set of challenges and opportunities compared to static assets like rooftop solar or household batteries. For example, while designed for transportation, EVs are stationary around 98% of the time—often parked at home overnight, or during the day at workplaces or commuter car parks. This is just one of several unique characteristics that shape their potential. Understanding these features, their influence on consumer behaviour, and the system structures required to support and unlock their full potential is critical. Those best placed to do so must be enabled with the right tools, authority, and commercial models to act effectively and operate sustainably.

While there is broad recognition of the opportunity to improve system-wide efficiency and the need to deliver tangible consumer benefits though EVs, there is a risk the market underestimates the structural inefficiencies and obstacles that exist, and how much the landscape has changed in just the past two to three years.

This Submission focuses on how global insights and recent developments can support a more open, efficient, and competitive Australian market structure

Our Submission

Connected Kerb Pty Ltd and Connected Kerb (AUST) Pty Ltd strongly support the waiver application submitted by CityPower, Powercor, and United Energy (CPU).

We view this proposal as a timely, important and unique opportunity to accelerate kerbside EV charging in a way that plans for and supports long-term system planning and delivers tangible consumer benefits.

We recommend two key improvements to the proposal:

1. **Expand the trial size**
   A deployment of 100 chargers is unlikely to generate the depth of insight needed on consumer engagement or system impact. While symbolically useful, a rollout of this size risks being too thinly spread, both geographically and demographically, to properly test how pricing, location and visibility factors influence user uptake.

   We propose that the deployment proceed in two tranches;
   - **Tranche 1**
     Minimum 100 to enable immediate operational and commercial testing.
   - **Tranche 2**
     A second, larger rollout, informed by Tranche 1 findings, designed to expand the network and deliver a more statistically and commercially meaningful dataset.

   Without this scale, the trial risks becoming a proof of installation rather than a proof of concept. To truly test behaviour, pricing signals, and system integration, the trial must be large enough to simulate real-world dynamics and consumer impact—especially how different users respond to pricing, accessibility and service experience. These insights are critical to designing a system that delivers tangible consumer benefits."

2. **Ensure retailer and EMSP integration from the outset**
   We strongly advocate that this trial should pay close attention to ensuring the charging infrastructure connects seamlessly with mobility service providers (MSPs) and electricity retailers. This integration is essential to enabling a competitive and innovative market.

   Each MSP must be able to offer customers a distinct, commercially differentiated experience at the charge point. This is not simply a technical consideration. It underpins customer choice, pricing flexibility, and long-term market efficiency. The necessary technical standards, such as OCPP and OCPI, are already available. What is needed now is alignment with market rules to enable their application.
   Currently, meter-based switching rules—typically limited to once per 24 hours—may restrict the ability to support session-level MSP or retailer engagement. Our position is that each EV charging session should allow for a distinct transaction with the customer's chosen MSP or retailer. This would enable dynamic pricing, loyalty integration, and tailored service offerings that will deliver visible and tangible benefits to end consumers.

   We understand DNSPs are already exploring ways to support this within existing regulatory constraints, and this trial presents a timely opportunity to test those solutions in practice.

Our Submission is grounded in our company's operational experience but is specifically focused on what Australia needs today.

Connected Kerb began as a vertically-integrated charge point owner, operator, and EMSP because that is what the early market required. Over a decade of operations we have

navigated the technical, commercial, and regulatory complexity of delivering EV infrastructure at scale. That experience has given us a clear view of what works, what doesn't, and what is required to meet the needs of a rapidly developing future.

The EV industry has changed significantly from its early days. In the past three years, improvements in protocols, platforms, and commercial models have enabled greater specialisation and efficiency. Infrastructure, software and services can now be unbundled, allowing each party to focus on what they do best.

This Submission is shaped by what these recent changes now make possible—and what the industry should be building towards. Australia's relatively nascent EV sector provides an opportunity to make fundamental decisions now that will enable Australia to avoid the legacy inefficiencies seen in earlier markets, actively adopting the structural efficiencies that today's environment can now support and that tomorrow's environment will demand.

Who is Connected Kerb?

Connected Kerb is one of the UK's largest EV charging providers. Over the past decade, we have built and now manage over 9000 publicly available AC charge points across more than 1000 locations. We are headquartered in London, with around 100 staff and are expanding internationally through public and private partnerships.

In 2025 we received a £55 million equity investment from the UK Infrastructure Bank to support further expansion.

As noted earlier, Connected Kerb began as a fully integrated charge point owner, operator and EMSP-- because that is what the early market required. We started at the kerb and now operate across the full EV charging landscape including AC, DC, fleet and public infrastructure.

That experience is now available to support a developing Australian market. But the industry has not only changed—it continues to change. Advances in technology, protocols and commercial models are enabling modular roles, better alignment between infrastructure and service delivery and more targeted investment. Like others in the market, we have and continue to evolve our operations to focus on where our capabilities and balance sheet can deliver the greatest value.

This shift reflects a broader movement across the sector towards more efficient structures and clearer responsibilities. The proposed CPU waiver supports this direction. It provides a foundation for the Australian market to adopt a more flexible, open model that delivers better outcomes for consumers, the electricity system and the EV industry.

Connected Kerb: Operational Context

Connected Kerb is an operating business. Every day we deploy, manage and maintain charge points. We manage faults, support users, optimise site performance and integrate with third-party systems. That practical experience shapes how we think.

EV charging is a complex business that requires:

- Significant upfront capital investment;
- Long-term patience on revenue;
- Discipline in site selection, pricing, maintenance and customer engagement; and
- Consistent growth from a low base.

As a fully integrated charge point owner, operator and EMSP, true operational sustainability typically begins at around 4000 to 5000 active chargers. Below that threshold, the cost to serve is disproportionately high. Many early players failed by trying to do everything themselves without the scale, focus, or operational depth required.

That being the historical experience, the market today is no longer restricted by vertically integrated models. Advances in technology, standardisation of protocols, and evolving commercial frameworks now support specialisation. EV charging is increasingly being delivered as an extension of existing businesses, not as a standalone ventures. For infrastructure companies, councils, utilities, generators and others already active in the system, this shift makes smaller charger bases viable and sustainable because they can now build on existing assets, capabilities and customer relationships.

This model of specialisation is now what will drive innovation and scale in this sector. It enables targeted investment, provides clearer roles and reduces risk. The industry is already heading in this direction, including our company which is now focusing on enabling others by providing the platforms, tools and operational insight to support efficient, scalable rollout across the EV supply chain.

Our real-world operations have also shown the broader system value of smart, software-led charging. In the UK, dynamic grid integration has allowed us to shift charging loads in real time in response to network conditions. This not only supports local grid stability but also allows us to hedge against peak wholesale energy prices. In some cases, this has doubled our energy margin without any change to end-user pricing—clear evidence that demand-side management can deliver both commercial and system-level benefits when executed effectively.

The Structural Change

The EV sector has matured rapidly, particularly in recent years. Open protocols such as OCPP and OCPI now enable secure, standardised communication across the ecosystem. Software is modular and scalable. Networks are interoperable. These are not aspirational

features. They are already proven through large-scale deployments across the UK, USA and Europe.

This structural change has reshaped the market and clear roles have emerged:

- Electrical manufacturers build smart charging hardware;
- Infrastructure owners fund, build and maintain the physical network;
- Energy retailers supply electricity and offer incentives to help manage load efficiently;
- Maintenance and installation providers manage connection, repairs, and uptime;
- EMSPs, including energy retailers and organisations with large customer bases, engage and retain users;
- Financial services manage transactions and settlement; and
- Platforms connect, monitor and optimise system performance across all participants

This separation of roles allows each business to specialise. It supports innovation, lowers cost and enables growth. Early rollout models often failed because they attempted to do everything within a single structure. Today, there exist the protocols, tools and operational experience to support a more efficient, scalable approach.

Specialisation creates more sustainable outcomes. It allows for targeted investment, reduces duplication and gives investors a clearer view of risk and return. It provides a framework where governments can support planning and investment while allowing the market to remain open, competitive and commercially led. Specialisation does not mean every participant steps aside. It means each part of the system is delivered by those best positioned to do so.

In the case of pole-mounted infrastructure, DNSPs are the logical owners and operators. They already manage the physical asset, understand the technical constraints and are best placed to ensure safe and efficient integration with the electricity network. This is not market interference. It is practical specialisation.

The real opportunity for innovation and customer engagement sits further downstream, where energy retailers, EMSPs and service platforms interact directly with consumers. This is where pricing signals, loyalty programs, flexible charging models and behavioural incentives will take shape. By enabling DNSPs to manage what they are structurally suited for, and allowing others to focus on customer-facing services, the market becomes more efficient and dynamic. It enables broader participation not by adding new layers, but by reducing friction—making it easier for capable businesses to operate at scale in areas aligned to their strengths.

This model also addresses the challenges that undermined early efforts. Vertically integrated operators often struggled with the combined pressure of capital investment, customer acquisition and technical execution. The market is now shifting toward a more open, collaborative structure. Australia is well placed to take advantage of this shift. The CPU waiver is not about creating a new model but about applying a proven structure in a way that reflects local context. It supports the AER's objective of encouraging competition, innovation and consumer benefit in a practical and achievable way.

We recognise that structural reform of this kind must align with the AER's broader regulatory framework. While we do not claim to speak to the full complexity of market design, this proposal reflects the perspective of a specialist operator working within that context. It

creates the conditions for broader industry participation—not by replacing what exists, but by enabling capable businesses to contribute, invest and scale in ways that reflect their strengths.

Leveraging Existing Capabilities

EV charging of itself is not a new sector. This Submission is more about supporting the development of a new use case for an established industry.

The product remains electricity and the transaction is still retail energy. What has changed, is where and how the service is delivered.

While this Submission focuses on a small but important part of the EV charging sector-- who is best placed to deliver infrastructure in the public domain -- we believe the most critical factor is not the infrastructure itself. It is the ability to deliver customers to that infrastructure. That is the real innovation. If customer engagement can be recognised and solved at the kerb, the same logic can be applied across the broader EV charging market.

Just as DNSPs are well placed to deliver infrastructure at the kerb, other established businesses are well placed to deliver infrastructure in other key parts of the market and in different locations. This includes car park operators, energy retailers, utilities, fleet managers and property owners.

However, the opportunity is not about building new infrastructure businesses. It is about enabling capable organisations to scale quickly and efficiently, using their existing systems, capital base and customer relationships. And even more critically, the opportunity is not just about infrastructure—it is about how the product is delivered to the customer.

This is where innovation will occur. Not just in building physical assets but in attracting and serving users.

Customer engagement is the foundation of value. Businesses that already know how to reach and retain customers—such as retailers, transport operators and local governments—will become increasingly central to the charging network. As they develop experience with EV customers, they will also become more capable of owning and managing infrastructure in logical settings, just as DNSPs are best placed to manage assets in the public realm.

Alongside this, companies like ours can and will provide the tools and platforms that enable others to participate. Manufacturers should focus on building the best hardware. Software providers should optimise performance and reliability. Retailers and EMSPs should focus on delivering customers to the grid. The role of the system is to make this specialisation possible.

This is the model for which we are advocating in Australia. One that removes barriers, supports efficiency, and allows each participant to apply their strengths—so that the entire market functions more effectively and customers experience the benefits.

The CPU waiver provides the practical step forward that will enable this structure to develop. By allowing DNSPs to deliver infrastructure where they are best suited, while ensuring that access remains open to energy retailers and service providers, the waiver effectively supports the AER's objective of promoting competition, efficiency and consumer benefit in a transitioning energy system.

Ultimately, this structure not only enables specialisation but delivers better outcomes for end users. Customers will benefit from more competitive pricing, broader access to charging across a wider range of locations, and integration with the loyalty, billing and energy services they already use. It removes unnecessary friction and helps ensure that EV charging fits seamlessly into consumers' lives—whether they are charging at home, at work, or in public.

Conclusion and Position of Support

We support this waiver because it will lead to smarter, more scalable EV and electricity markets in Australia.

Given our experience and successful continued operation in this field, we strongly advocate for markets that do not protect legacy structures or try to hold onto control of every part of the value chain.

That is why we are advocating in Australia to operate differently from the way we have developed our successful operations in other markets, because with experience, the maturation of the sector and continued changes to the operating environment we strongly believe a better, more scalable way to move forward for the Australian energy and EV markets.

With deep understanding of the infrastructure, software commercial risks and operational realities, we recognise that our capital, systems, and expertise are now able to enable others—retailers, councils, utilities property owners—to participate efficiently and with maximum impact. That is how this market will grow and innovations will be achieved.

We believe this approach will enable faster rollout, stronger customer engagement, and a more efficient, resilient and sustainable EV charging and electricity market. By improving market efficiency, it will also help lower charging costs for consumers.

The CPU waiver supports this evolution. It enables specialisation. It allows DNSPs to deliver infrastructure where they are structurally best suited and ensures that others, particularly those who manage customer relationships, can do what they do best.

We therefore strongly support the Proposed CPU waiver.

Consultation Questions

Consultation Question 1: Do the current dynamics of the markets suggest a thriving and competitive marketplace?

Response: No. While there is visible interest and some rollout activity, much of it has relied on government grants. This has not yet translated into a thriving competitive market, particularly for kerbside infrastructure which remains underdeveloped.

The issue is not market structure alone, nor a shortage of capable participants. It is the lack of sustained engagement by those best placed to scale. This is due to the current operating models, which ask individual businesses to carry the full delivery risk. That includes infrastructure ownership, customer acquisition and network operation. .In practice, this limits participation to those with both balance sheet capacity and deep operational experience.

The way forward is not to assume this is a new market. It is to recognise that we now have the tools and experience to support a more specialised model. That model is already working overseas and can be enabled in Australia and supported through this waiver.

Consultation Question 2: Do you agree a market insufficiency exists? What are your views on the cause of any coverage gaps across metropolitan, inner city and suburban/regional areas?

Response: Yes. There is a clear market insufficiency. There has been very limited deployment across metropolitan, suburban and regional areas, particularly at the kerbside.

The issue is not a shortage of capable participants. It is that the delivery models used to date rely heavily on grant funding and require each participant to carry full commercial risk. This has limited investment and led to isolated deployments, often without a clear view of what drives EV charging behaviour and uptake.

We believe the real gap lies not in the infrastructure itself, but in understanding and addressing consumer behaviour and needs. Our experience strongly suggests that EV charging behaviour is distinct from that of internal combustion vehicles. Yet much of the planning and allocation to date appears to assume otherwise. This assumption has shaped how grants have been located and allocated to date.

Importantly, the focus should not be limited to current EV owners. The real test is understanding what influences people who are considering buying an EV, and what infrastructure will help drive that decision. This reflects our operating experience in comparable markets.

The two-tranche approach we support reflects this. The first tranche is about making the infrastructure work. The second is about creating scale to observe, measure, and engage consumers, so that future investment is better targeted and more impactful.

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

Response: We believe this trial can provide significant operational and commercial insights. It allows CPU to test real-world deployment and integration of EV charging at the kerb, using infrastructure they already manage.

The most valuable learnings will come from how charging is managed at scale. If supported by a suitable ChargePoint Management System, the infrastructure can respond to five-minute wholesale electricity prices. This enables dynamic load control and allows the DNSP or its partners to physically hedge energy costs by controlling when and how energy is drawn from the grid. This type of active management supports both network stability and better pricing outcomes for consumers.

The system also enables visibility and reporting across individual chargers and locations, allowing for targeted investment, efficient maintenance and better consumer engagement.

These are not future aspirational capabilities. They are proven and in use internationally. We have attached an overview of our software to show what is already possible and how it could be applied in this trial.

The trial is not just about infrastructure. It is a chance to understand how DNSPs can support a market-led rollout by managing the grid-side complexity while enabling customer-side innovation.

Consultation Question 4: What are your views on CPU's claim that they can provide kerbside EV chargers more cost-effectively than other third parties?

Response: We believe CPU's claim is fundamentally sound—when confined to public kerbside infrastructure.

We see no reason to doubt this claim. CPU controls the infrastructure, understands the assets, and has existing teams and systems in place to deliver efficiently. This scale and familiarity give them a clear cost advantage in kerbside deployment—particularly when compared to vertically integrated models that must build from scratch.

The benefit is not just in lower operating costs. It also comes from better capital allocation across the industry. When DNSPs take responsibility for grid-side infrastructure, it frees up specialist operators to focus their resources on higher-return areas such as customer engagement, fleet services and energy retail. This improves overall market efficiency and creates better outcomes across the system.

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

Response: We do not see CPU's proposed trial as a threat to competition. In fact, we believe it enables it.

Infrastructure is not the domain where competition delivers the most value. The real opportunity is in releasing multiple energy retailers and EMSPs to compete on service, pricing and innovation. That only happens when the infrastructure is in place.

This model reflects how Australia already manages competition in electricity. We do not duplicate poles and wires—we regulate access to them and let retailers compete. The same principle applies here. The DNSP delivers the asset efficiently and the market competes on top of it.

Done properly, this approach broadens participation and lowers barriers to entry. It allows more businesses to treat EV charging as an extension of their existing operations and customer base, not a separate vertical with its own fixed infrastructure risk.

Consultation Question 6: What are your views on CPU's proposed method of selecting EV charging sites based on areas with high EV ownership and number of units (100 EV chargers)?

Response: EV ownership is a logical starting point, but it is only one of a range of inputs that can be used to identify the best sites. On its own, it is unlikely to reveal meaningful insights about demand or consumer behaviour. That said, it will allow useful early activity and learnings will build over time.

If CPU wanted to go further from the outset, tools already exist to support that. As outlined in the attached ASAP presentation, geospatial modelling can incorporate traffic flow, parking dwell times, grid capacity, land use, demographics and apartment density. This type of approach reflects real-world usage and allows more deliberate planning.

Using these tools requires scale, data access, and institutional capacity. CPU is well placed to deliver this and to place infrastructure where EMSPs can create value and drive customer adoption.

Consultation Question 7: What are your views on the depth of the market for kerbside AC EVCI?

Response: We broadly agree with the AC charging proposition put forward by CPU. It is where Connected Kerb originally focused, and while we now operate across both AC and DC, we see them serving distinct user needs.

DC charging is well suited to those who are paid to be on the road or need to get back on the road quickly. It offers speed but at a premium price, one that users will only pay when speed is essential.

AC charging better matches typical driving behaviour and the way electricity is accessed. Unlike combustion vehicles, EVs can be charged where they are parked, at home, work or on the street. Planning that assumes we need to replicate the petrol station model has missed this point

Our UK experience suggests that AC is under less commercial pressure than DC. It is a deep market, well aligned to how EVs are used in practice, and we expect it to expand

significantly. Kerbside AC also enables scalable deployment at lower cost, making it essential to meeting infrastructure targets in a financially sustainable way.

Consultation Question 8: What are your views on the potential for CPU to discriminate against third-party EV charging service providers?

Response: We do not believe CPU's role at the kerbside presents any material risk to competition. This is a highly specific segment of the EV charging market. It is likely to represent less than ten percent of the total infrastructure opportunity and an even smaller share of the total market opportunity, when measured in terms of revenue and long-term customer value.

It is also precisely where CPU is best placed to operate. These are its assets and it has the capability, workforce and operational understanding and experience to deploy efficiently and safely at scale.

CPU cannot compete in areas where third-party EV charging service providers operate most effectively. It cannot deliver in retail centres, commuter car parks, depots, or workplaces. These are locations where customer engagement, energy retail and integrated services matter most—and where EMSPs and other providers are structurally better positioned.

Yes, CPU has a structural advantage at the kerbside. But recognising that advantage and using it efficiently is not discriminatory. It is good market design.

Consultation Question 9: Would the conditions above be fit for purpose, if a waiver is granted? Which are higher or lower priority?

Consultation Question 10: Would the conditions above be fit for purpose, if a waiver is granted? Which are higher or lower priority?

Consultation Question 11: What data should CPU share as a minimum, and are there specific metrics that should be used?

Response: We are not experts in how the AER monitors or applies controls over CPU or its regulated network services. Our role in this Submission is to highlight where we believe the greatest value in this trial lies and what factors are most important to achieving a successful outcome.

We believe the overall value of this trial lies in what CPU is facilitating by the rollout of the infrastructure, not in the infrastructure alone. The benefit will come from how CPU's structural advantage enables others to engage customers more effectively. This includes retailers, EMSPs, councils and planners. The infrastructure enables innovation but does not compete with it.

Our concern is that some of the proposed waiver conditions shift focus away from high-level oversight and into specific operational areas that are either unnecessary or already managed through existing obligations. The AER presumably already applies a strong and appropriate

set of controls to CPU in its day-to-day operations, particularly in how it interacts with energy retailers and delivers electricity to customers. At its core this trial is an extension of that same responsibility, with many of the same customer-facing companies involved.

We know that areas such as cybersecurity, transparency and operational reliability are already central to CPU's obligations across the electricity network and we expect the same standards would apply here. There is no need to introduce new burdens where existing obligations already achieve the desired outcome.

We also believe this trial presents a unique opportunity. Because CPU is not involved in customer acquisition or retail energy pricing, it does not compete with EMSPs or retailers. This creates a complementary structure where infrastructure provision and customer engagement are naturally separated. That structure creates the conditions for open data exchange and shared value. In this case, data sharing should be seen as a two-way street. EMSPs and energy retailers benefit from the availability of public infrastructure and CPU benefits from better customer insights to inform site performance and future planning.

In our view, most of the outcomes the AER is seeking -- competition, transparency, efficiency -- are more likely to emerge through the structure of the trial and the incentives it creates, rather than through prescriptive conditions. Trying to define the full model, upfront, risks constraining innovation. Oversight and accountability matter, but flexibility and proportionality should guide the design.

We suggest any waiver conditions be shaped by the following principles:

- Proportionality: Reflect the limited scope of the trial and avoid overburdening CPU with requirements beyond its infrastructure role;
- Consistency with existing obligations: Build on the existing standards that apply to CPU in other parts of its network operations;
- Support for role separation: Focus on maintaining a clear separation between infrastructure ownership and customer-facing services;
- Market-based enablement: Encourage competitive outcomes by supporting EMSPs and retailers to use CPU infrastructure rather than defining how those outcomes must be achieved;
- Shared value through transparency: Treat data sharing as a mutually beneficial exchange, not a compliance burden.