

13 June 2025

Ms Stephanie Jolly
Executive General Manager Consumer, Policy and Markets Division
Australian Energy Regulator

Dear Ms Jolly,

Ring-fencing waiver application for an EV charging infrastructure trial from CitiPower, Powercor, and United Energy Consultation Paper

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Regulator's (AER) Consultation Paper on a ring-fencing waiver application for a kerbside electric vehicle charging infrastructure (EVCI) trial from CitiPower, Powercor, and United Energy (CPU).¹

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA supports CPU's proposal to trial 100 new kerbside EVCI in Victoria. Under the Victorian Government ZEV Roadmap, by 2035 all newly sold vehicles will be electric.² To achieve this, EVCI needs to be accessible for all. Broadening the variety of EVCI available in the community makes electric vehicles (EV's) more accessible.

Owning an EV can help Australians lower the costs of owning and operating a car, as well as contribute to the goal of lowering emissions. Modelling in *The Time is Now* report demonstrates that customers with an EV can save up to \$2,500 per year in lower energy costs.³ Increasing the availability of kerbside chargers across CPU's jurisdiction encourages more Victorian customers to invest in EV's, lowering both long-term costs for consumers and transport-related emissions.

Kerbside charging added to the mix

Access to charging infrastructure is a barrier for 32% of potential EV buyers.⁴ In many of CPU's proposed locations, including inner city Melbourne, off-street parking is unavailable. Kerbside EVCI can provide public charging locations for those without off-street parking. CPU's trial encourages EV purchases among a broader range of demographics, such as those who live in apartments, high density areas, or renters who change residences more frequently and will require broader charging locational availability.

¹ Australian Energy Regulator, *Consultation paper – CPU ring-fencing waiver for EV charging infrastructure*, 15 April 2025 <https://www.aer.gov.au/system/files/2025-04/AER%20-%20Ring-fencing%20consultation%20paper%20-%20CPU%20EV%20charging%20infrastructure.pdf>

² The State of Victoria Department of Environment, Land, Water and Planning, *Victoria's Zero Emissions Vehicle Roadmap*, May 2021 https://www.energy.vic.gov.au/_data/assets/pdf_file/0031/583726/Zero-emission-vehicle-roadmap.pdf

³ Energy Networks Australia and L.E.K Consulting, *The Time is Now*, August 2024 <https://www.energynetworks.com.au/assets/uploads/The-Time-is-Now-Report-ENA-LEK-August-2024.pdf>

⁴ Consumer Policy Research Centre, *The barriers and potential enablers of electric vehicle uptake in Australia*, November 2022 https://cprc.org.au/wp-content/uploads/2022/11/EV_WorkingPaper_Final.pdf

Of the proposed locations, CPU includes nine regional localities to trial EVCI reflecting current EV ownership. While off-street parking is more readily available in regional areas, the investment balances the share of network resources between metro and regional customers.

Additionally, a focus on regional EVCI reduces range anxiety for all EV users. Range anxiety, found to be the second highest concern for potential EV buyers,⁵ refers to the concern of the availability of charging sites when travelling outside of local areas. Increasing regional public EVCI can also ease concerns of long-range travel and help support regional tourism.

CPU's 80 proposed locations reflect current EV ownership and infrastructure gaps, meeting existing demand for charging infrastructure to maximise utilisation. However, CPU's proposed engagement with the Victorian Government for 20 of the kerbside chargers will support development of EVCI to encourage and meet future demand, ensuring that the community is not left behind.

A small, targeted proposal to trial making kerbside chargers available to consumers in Victoria

Victoria is falling behind other states in the availability of EVCI, creating additional barriers for a range of drivers. There is currently a market insufficiency in public EV charging and there are currently no kerbside EV chargers in Victoria. Comparing to NSW, as of April 2025, thanks to NSW Government kerbside charging grants, there are over 670 kerbside chargers available to the public 24/7.⁶ That said, these numbers fall well short of the NSW Government's and CSIRO's forecast need for 38,000 public chargers in NSW by 2030.⁷

CPU's proposal seeks to introduce a new trial type of EVCI to Victorian EV owners that can be introduced at lower cost and greater scale than other forms of EVCI on private land. The introduction of kerbside chargers expands the market to deliver different chargers for different types of travel and consumer needs. This is especially relevant for the proposed regional locations, where there is a strong absence of public charging infrastructure.

Ensuring competition in EVCI

As the AER notes in the consultation paper, the trial must not prevent market competition. ENA agrees competition is an essential part of the energy regulatory framework and this should likewise occur in the newly developing EVCI market.

CPU's proposal is not seeking to weaken competition or attempt to gain market share. The intention of the trial is to introduce and kick-start the development of kerbside charging in Victoria, filling a gap in the broader EVCI market. The introduction of kerbside EVCI does not eliminate competition from other forms of EVCI nor does it intend to. Kerbside charging is vital for users without off-street parking, eases range anxiety (especially when placed in regional areas), and provide greater confidence for all users to find available charging.

As part of the proposed trial waiver, CPU will earn no revenue from the trial through using a user-pays model and the infrastructure is not included in the regulated asset base (RAB) or have a bill impact to customers. CPU will have no direct contact with the user of the EVCI, instead managed through a third-party charge point operators (CPO). Having a CPO as the operator increases market competition and brings in new market participants in a low-risk environment. The trial can be an

⁵ Consumer Policy Research Centre, *The barriers and potential enablers of electric vehicle uptake in Australia*, November 2022 https://cprc.org.au/wp-content/uploads/2022/11/EV_WorkingPaper_Final.pdf

⁶ NSW Climate and Energy Action, *Electric vehicle kerbside charging grants*, 4 April 2025 <https://www.energy.nsw.gov.au/business-and-industry/programs-grants-and-schemes/electric-vehicles/electric-vehicle-kerbside#:~:text=Round%201%20results,day%2C%207%20days%20per%20week.>

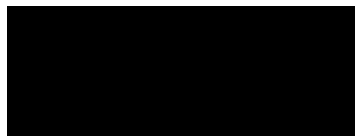
⁷ Ausgrid, *Kerbside Charging* <https://www.ausgrid.com.au/About-Us/Future-Grid/Electric-Vehicles/Kerbside-charging#:~:text=The%20NSW%20Government%20estimates%20that,existing%20kiosks%20and%20power%20poles.>

example that kerbside chargers work in Victoria and encourage any appointed CPO's or other third parties to further invest in more kerbside chargers in other locations.

In addition, CPU has proposed an exit plan to sell any trial EVCI where there is no long-term role for networks after the trial waiver concludes in 2031.

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Economic Analyst, on [REDACTED]

Yours sincerely,



Garth Crawford
General Manager Economic Regulation