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AER

Via email: AERringfencing@aer.gov.au.

Electric Vehicle Council's response to the AER consultation on CPU's ring-fencing waiver application for providing kerbside EV charging infrastructure

The Electric Vehicle Council (EVC) welcomes the opportunity to provide feedback to the Australian Energy Regulator (AER) on the [consultation paper](#). The EVC is the national peak body for the electric vehicle (EV) industry in Australia. Our mission is to accelerate the electrification of transport for a sustainable and prosperous future. We represent businesses across the EV value chain, including car, bus and truck manufacturers, importers, operators, charging infrastructure suppliers, battery reuse and recycling companies, financiers, and network providers.

Growing Australia's Charging Infrastructure

Expanding EV charging infrastructure is critical to meeting the target of 1 million EVs on Australian roads by 2027. Governments and regulators have key decisions to make about the best model for Australia to roll out kerbside charging infrastructure. Additionally, the transport electrification contributes significantly to the National Electricity Objective (NEO) *"to promote efficient investment in operation and use of, electricity services for the long term interests of consumers of electricity with respect toreducing Australia's greenhouse gas emissions,"* which means that it is incumbent upon the AER to consider carefully market measures which may affect the timely meeting of this objective. However, more data and analysis are needed to assess the current state of the charging market, to inform which model will best deliver rapid, consumer-centric and cost-efficient expansion.

Before government and regulators support any proposed models for kerbside charging that requires changes to the roles and responsibilities of market participants, including the current proposal put forward by DNSPs, we call for regulators to run a thorough and consultative inquiry to ensure the avoidance of creating any real or perceived market distortions through the precedent of this waiver.

This process should consider which model will best serve Australia's EV transition across several criteria including speed of rollout, cost to government, customer costs and impacts, the competition issues arising from regulated monopolies competing with private companies, relevant international experiences amongst other issues. Via ongoing consultation with our members who have provided us their inputs into this process, we urge

the AER to consider specifically what additional analysis is required to achieve the most holistic energy market outcome, which may include targeted mapping for EV charger demand, cost-benefit analyses or other economic reviews, options for tariff reform tailored to EV charging, and a clear assessment of the barriers to EV charging installation under the current market arrangements.

The EVC does not put forward a position for or against the specific CPU's ring-fencing waiver application trial, but the AER should give close consideration to the following focus areas:

Speed of Rollout: Is there evidence of market failure?

EVs play an important role in the energy transition, and the policy and regulatory landscape is highly complex. We support improved data demonstrating the status of the charging rollout and the current charging market locally and consider this a key input into the regulatory decision-making process.

When assessing this proposal, the AER should consider existing data on the current status of the EV rollout and evidence of market health, where available, and be guided by this evidence wherever it exists.

The AER should look at how this proposal uses that data and addresses any gaps - like coverage or future needs.

Where evidence is lacking, the assessment should seek to establish it to inform sound decision-making.

Competition Issues: Is there innovation?

There are several existing kerbside charging infrastructure providers in an established market offering in Australia. Competition in the EV charging market is desirable for consumer benefits through market growth and product innovation. Departures from the current market roles and responsibilities should be based on evidence-based policy that demonstrably gets more people into EVs sooner, at the lowest existing and ongoing cost to customers.

Costs: Is there transparency on costs, their impact to government and consumers?

In the case of kerbside EV charging market expansion, there is limited evidence of how much this will cost consumers and government. If the costs can be demonstrably shown to be substantially lower than any other mechanism, the AER should consider how can this be delivered without giving the regulated network businesses an advantage above other market participants. An evidence-based assessment is needed to present areas of cost savings through changes to market arrangements and any impacts to reduced competition.

Customer Impacts: Is there customer benefit?

To reach a goal of 50% of new car sales being electric by 2030, consumers must continue to see benefits from the role of EVs in the energy transition – and be able to justify the costs and benefits of supporting their roll out.

The consultation [paper](#), mentions the 'chicken and egg dilemma'. The EVC views this more as that EV charging infrastructure should adequately lead EV uptake. The assessment should consider if the proposal balances utilisation, user pays, the cross-subsidising of the

deployment of EVSE and costs/benefits of this model, the overall cost of energy for EVs and more broadly the risk of backlash from non-EV drivers.¹

If you have any questions on this submission, please contact Michael Shaughnessy at [REDACTED]

The EVC acknowledges that different members may have different views, and we have encouraged them to also make direct submissions to this consultation process.

Thank you for your consideration of our submission.

Yours sincerely,

[REDACTED]

Chief Executive Officer

¹ [EVC submission to DPIE energy customer policy reform consultation - Electric Vehicle Council](#)