



13 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,

Submission
Ring-fencing Waiver Application – CPU EV Charging Infrastructure Trial

Thank you for the opportunity to provide a submission to this consultation.

The following observations and recommendations are based on policy consultations, stakeholder engagement, and evidence-based research into the ongoing rollout of EV infrastructure across NSW.

The NRMA has long advocated for a sustainable and equitable transition to EVs, and we remain committed to a policy framework that supports both industry innovation and consumer choice. We encourage regulatory mechanisms that balance competitive neutrality with the public interest.

Ensuring Competitive Markets through Ring-Fencing

The NRMA's most significant concern relates to the involvement of Distribution Network Service Providers (DNSPs) in the provision of public-facing EV charging infrastructure, particularly in competitive, high-utilisation areas such as inner metro, suburban, and regional centres. Feedback from extensive consultations with Charge Point Operators (CPOs), the Electric Vehicle Council (EVC) and other experts reveals concerns about the potential for monopolistic practices, reduced innovation, and diminished consumer focus.

We recognise, however, there are potential benefits associated with DNSP involvement. Their existing workforce and ability to bundle deployment with grid upgrades could improve cost efficiency, while centralised delivery may support faster rollout and reduce fragmentation. However, these benefits are not unique to DNSPs—alternative models could offer similar advantages if implemented at scale.

The UK's Local Electric Vehicle Infrastructure (LEVI) scheme is one such model that demonstrates how targeted public funding and collaborative deployment can succeed without requiring DNSPs to deliver public-facing services. Locally, NSW's destination charging grants have shown that competitive neutrality can be maintained while accelerating the rollout.

We believe a government-led review, which considers both domestic and international models, is needed to assess the most effective and equitable delivery models before endorsing any specific approach—including DNSP involvement.

Additional Measures to Support EV Infrastructure Deployment

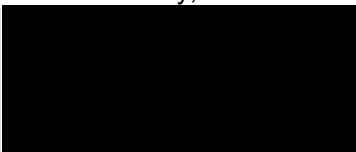
- **Targeted funding:** Government grant programs should allow CPOs to offer fit-for-purpose charging solutions tailored to sites, avoiding unnecessary default reliance on high-powered chargers where they are impractical.



- **Support for apartments and local councils:** The NRMA supports co-funding mechanisms for apartment and kerbside charging infrastructure deployment. Rebate programs, when paired with guidance from councils, could help overcome logistical barriers to charger installation, including concerns over public parking reallocation.
- **Heavy vehicle electrification:** Targeted incentives for fleet operators—including small businesses—to transition to electric heavy vehicles (4.5 tonnes or above) and install compatible charging infrastructure should be introduced.
- **Interoperability:** Ensuring interoperability across all EV charging sites is essential to improving the user experience and encouraging widespread adoption of EVs. By consolidating access to charging infrastructure into a single, seamless platform, drivers will no longer need to manage multiple apps or payment systems, reducing complexity and frustration. This approach aligns with the intent behind similar initiatives, such as the NSW Government's Park'nPay app for parking, which simplifies access to services by providing a unified platform. A consistent, efficient charging experience is key to boosting consumer confidence and supporting the transition to a sustainable transport future, ultimately facilitating the rapid uptake of EVs.
- **V2X incentives:** The NRMA supports the introduction of targeted financial and policy-based incentives to accelerate the adoption of bi-directional charging technologies, such as Vehicle-to-Grid (V2G) and Vehicle-to-Everything (V2X). Our recent survey of over 1,300 NRMA members—conducted with the UTS Institute for Sustainable Futures and iMOVE Cooperative Research Centre—revealed that 54 per cent of EV drivers are interested in adopting V2G technology in the near future. Incentives must be paired with streamlined connection processes, regulatory reform, and dedicated public education campaigns. V2G presents a transformative opportunity: it can help alleviate pressure on the energy grid, enable households to offset electricity costs, and contribute to Australia's broader energy transition.
- **Accessible charging infrastructure:** The NRMA supports the development of accessibility guidelines for EV charging infrastructure by the NSW Government in conjunction with Austroads, La Trobe University, the Australian Federation of Disability Organisations (AFDO) and other industry representatives. Accessible EV charging bays should meet standards such as AS/NZS 2890.6:2009 and AS/NZS 2890.5:2020, ensuring features like level surfaces, kerb ramps, adequate bay dimensions, accessible charger heights, and compliant user interfaces. These measures are essential to enable safe, independent use by people with disabilities. The harmonisation of guidelines across Australia is also essential.
- **Workforce readiness:** Despite national investment in EV training, small businesses continue to face barriers such as high costs and limited access to upskilling. The NRMA supports updated technical licensing pathways, targeted training support, and the retention of exemptions critical to service delivery (e.g. enabling roadside assistance staff to safely perform interventions that don't include the EVs high voltage components). It is also vital to prioritise workforce development through accessible, regionally-focused programs that equip local technicians and small operators to meet growing EV servicing and EV charging infrastructure repair demands.

The NRMA appreciates the opportunity to contribute to this consultation.

Yours sincerely,



Robert Giltinan
Director of Policy & Public Affairs