Submission into the AER consultation on: CitiPower, Powercor, and United Energy - Ring-fencing waiver - Electric vehicle charging infrastructure

June 2025

By: Ross De Rango

[redacted]

Reference:

https://www.aer.gov.au/industry/networks/ring-fencing/citipower-powercor-and-united-energy-ring-fencing-waiver-electric-vehicle-charging-infrastructure

Preamble:

Ross is the former Head of Energy and Infrastructure at the Electric Vehicle Council, and has recently founded a new business, Vehicle Charging Solutions Australia.

Ross' background includes:

- Detailed work in the National Construction Code (NCC) to create EV readiness requirements in new buildings,
- Submissions to the Australian Energy Regulator (AER) that have shaped the AER's advice to ministers on consumer protections for EV charging.
- Input into regulatory reset processes, shaping the tariff structures applicable to public charging infrastructure operators in WA, NSW, Victoria, SA, and QLD.
- Close engagement with NSW government on the majority of EV charging programs currently in operation, including the kerbside program.
- Participation in the development of Australian Standards relating to demand response, electric vehicle maintenance, vehicle to grid, and the national electrical wiring rules.

For the avoidance of doubt, this submission is not to be considered the position of the Electric Vehicle Council. It is the position of a very active industry expert.

The key takeaway is:

This waiver should not be allowed.

It is not necessary for this waiver to be provided, in order that the DNSPs involved test the core matters they are claiming to be looking to test. Further, the core things that they are claiming to want to test are already proven capabilities, operating in Australia today, under existing market conditions. This much is a matter of fact.

I believe (though I cannot prove, and do not assert as fact) that the real purpose of the waiver request is to test the AER's processes, and the political environment influencing the processes, for issuing waivers that dilute or degrade ringfencing protections in favour of the DNSPs.

The proposed operating model architecture has been shown to deliver harm to consumers in Europe, sufficient that regulators have needed to step in to protect them. This, also, is a matter of fact. It is ill-conceived, likely to deliver significant additional power to the DNSP, in a manner not consistent with good consumer outcomes.

What's being asked for?

Citipower are currently seeking permission from the regulator to own 100 public facing pole mounted EV chargers. The reason they need to ask the regulator for permission before they do this is that the rules explicitly forbid them from owning this kind of kit.

The reason for the rules that stop them is that the ownership of public EV charging hardware is currently a competitive market.

Letting a monopoly like an energy network compete with the businesses they serve – businesses who are required to ask permission from that monopoly, and accept that monopoly's terms, on matters core to their operation – is clearly not a recipe for a healthy competitive landscape.

By way of simple comparison:

Imagine if a for-profit trucking company had a right, guaranteed in law, to be the only business involved in the transport of food in a particular city. Imagine this works, because **the rules limit their activity just to running trucks**, and there's a regulator that sets the prices they charge for moving food around.

What would we think about that trucking business **trying to buy supermarkets**, that they lease out **on their terms** to their **preferred partners** to operate, in competition with the existing shops that they deliver food to?

- What might happen to those existing shops selling food to the people of that city?
- What might happen to the potential for new shops to exist?
- What might ***then*** happen to the price, quality, and reliability of food available to consumers, once the trucking company has driven out of business all the food shops that they don't own?

The answers to those questions are the basic reason that we have ringfencing rules.

These are rules that put limits on what multi-billion dollar for-profit monopolies are allowed to do, in order that consumers are protected from predation by them.

It's these rules that Citipower are asking to be set aside, so that they can test new ways to enrich their shareholders.

Why is NSW succeeding in a competitively led rollout of public EV charging, while Victoria is not?

Melbourne has virtually no powerpole mounted EV charging infrastructure, while Sydney has lots, and a thriving competitive landscape delivering more.

In NSW, there's an *excellent* state government program to co-fund pole mounted EV chargers, which is part of the reason…. But there's ARENA funding for this type of thing too[1], and it's historically been more generous in terms of dollars per charger deployed than the NSW scheme, and it's federal.

Further, the Victorian government committed $1.35 million to support the same business (Intellihub) that successfully deployed 50 chargers in Sydney under that ARENA grant, to do the same in Victoria – almost two years ago.

So the existence of a particular NSW state government program isn't the whole reason for the lack of these assets in Melbourne.

When you lift the lid on this type of deployment, what you find is a thing called a 'Facilities Access Agreement', or FAA, between the business that owns the EV charger (a Charge Point Operator, or CPO), and the business that owns the pole (a Distribution Network Service Provider, or DNSP).

'FAA' is a fancy way of saying 'rental agreement'. It covers what the business that owns the public EV charging hardware is expected to pay the network that owns the pole, for the right to attach the charger to the pole and operate it there.

The FAA is in addition to the connection charges, and the network charges in the energy bill. Rather than being a publicly disclosed price - which is standard for connection costs for houses and tariff rates for everyone, because the business offering the price is a big monopoly running an essential service - the FAA is a closed door negotiation, with the DNSP able to set whatever price they like, on a 'take it or leave it' basis.

As a point of comparison, if we consider the money paid to the network by a typical new house in the Citipower area over a five year period:

- There's typically a one-off connection fee of about $600 for a single phase supply, or $740 for a three phase supply.
- There's the contribution to the network's costs in the electricity bill. A typical home spends about $1800 per year on electricity, of which about 40% goes to the network.

So the network collects roughly $3600 from the resident in the house through the energy bill, plus the $600 for the connection, for a total of about **$4200** over five years.

An EV charger deployed on a power-pole will pay similar costs for the connection part. In the energy bill, if the charger is delivering a similar amount of energy to what an average house uses, it'll pay similarly there too.

[1] https://arena.gov.au/assets/2024/12/Intellihub-Intellihub-Street-Power-Pole-EV-Charger-with-Grid-Integration-Lessons-Learnt-Report-3.pdf

A well-utilised public AC EV charger – for example, in a residential street with lots of EVs, and limited off-street parking - might put through three times the energy that a typical house uses, so it might be paying the network $12,000 or so over the five year period.

A reasonable person might think that given this, Citipower would be *super keen* to help businesses deploy these things on poles, and just treat them like houses, because the connection arrangement is pretty similar, and it's very easy money for them through the energy bill.

The Facilities Access Agreement, though, presents an opportunity to try to push this $12,000 opportunity (per EV charger, over five years) to whole other level. What I've heard is that Citipower are asking for over $3500, per pole, per year, for the 'rent'... on top of what they get paid for the connection, and what they get through the energy bill. This would amount to an extra $20k or thereabouts in rental charges under the FAA, over the five years, per EV charger deployed.

To be clear, I'd welcome some actual data and transparency on this matter. I cannot prove that this is the price point, because these negotiations aren't public.... but if what I've heard is correct, it would mean that while Citipower's revenue from the typical new house in the street might be $4200 or so over five years, they're looking for more like $30,000 over five years for each pole mounted EV charger in their area.

The ~$20k squeeze for the rent under the FAA – if that's what it is - isn't for Citipower to actually do anything that costs them much money. The business that owns the charger is still doing all the maintenance on the charger, the poles are already there with maintenance funded through everyone's energy bills, and any addition to the operating costs of the network from the usage of the charger are also covered through the network's portion of the energy bill.

The reason this level of rent seeking would be a problem – if it's correct – is that in a five year period, an EV driver paying a sensible price for public EV charging, and *only* using that one specific public charger as an alternative to charging at home, might use 2000kWh annually, and expect to pay 40c/kWh.... For a total of about $800 per year, or $4000 over five years.

If Citipower's ask of the owner of the charging hardware is an extra $20k in rent, they're asking for the owner of the charging hardware to pass through the entire top line income, from five EV drivers who use that charger as an alternative to home charging for the vast bulk of their charging needs, *in addition* to taking roughly a 40% cut of the retail energy bill at the location.

It simply will not stack up.

If a person were suspicious, they might conclude that the price point of the FAA had been set ***with the intent*** that it would not stack up without massive government subsidy.... Of course I would not make an allegation like that without proof.

At the same time as this is going on, Citipower and the other Victorian DNSPs are using their control over the Service and Installation Rules in a manner that obstructs the deployment of *other kinds* of public EV charging equipment[2]

A suspicious person might wonder if there's a business plan behind that ongoing obstruction.... but, once again, I would not level that accusation without proof.

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[2] https://www.linkedin.com/pulse/gospel-according-uncle-ben-ross-de-rango-zkkdc/

This is the context in which Citipower - and Energy Networks Australia - are running positions, based on questionable data[3], along the lines of, "the competitive market seems to be struggling to deploy enough public EV chargers. How about we change the rules so that we can own the public EV chargers?", and "How about we just start with a trial?".

What about the proposed network benefits?

There's a huge benefit to be had from pole mounted EV charging supporting uptake of EVs among people who don't have off-street parking. Making public EV charging accessible will help more people move away from petrol and diesel cars in the inner city, which will clean up the air we breathe, as well as reducing transport costs.

There's additional benefit to be had from pole mounted EV charging preferentially delivering energy in the middle of the day (solar soak) and the middle of the night (off peak).

Much of the rationale behind the waiver request, and certainly the public facing justification by senior staff at Citipower, for the expansion of their monopolies in this way, goes to the desire on the part of the energy network to learn how to undertake load management and orchestration of public EV charging. There are real benefits to be had here – but they do not require a monopoly to own the public EV charging hardware in order to be achieved.

A competitive charge point operator running the EV charger, provided they've got access to typical competitive retail tariffs at that location, is *already commercially incentivised* to use pricing to steer the drivers towards grid-friendly charging.

If the energy network wants additional control over the ability for drivers to charge their cars, then they can ask nicely, and set something technical up with the business that owns the hardware. The technology stack to enable remote management of charging equipment by the businesses that own the equipment is thoroughly proven, locally, because it's already in use on thousands of public EV charging sites in Australia and hundreds of thousands around the world.

As concrete examples of how technology of this nature has already being applied in Australia:

1. **Jemena Dynamic Electric Vehicle Charging Trial (launched ~2020)**
   https://arena.gov.au/projects/jemena-dynamic-electric-vehicle-charging-trial/
   This trial, supported by $1.55m in federal funding, involved Jemena working in collaboration with multiple other DNSPs, and Jetcharge in the private sector.

   Jetcharge installed the hardware in consumer homes, and ran a control and aggregation software layer. DNSPs sent Jetcharge operating envelopes, so that the chargers could be controlled by Jetcharge to meet DNSP requirements.

   It worked just fine – four years ago. That it did not scale in market is nothing to do with the capability of the technology, and everything to do with the fact that shifting EV charging load out of peak time is much more cost-efficiently done with retail Time of Use tariffs than with Orchestration…. As demonstrated by the tens of thousands of Australian consumers using plans like AGL's 'Night EV Saver' offering.

[3] https://www.linkedin.com/pulse/hey-iea-your-ev-charging-data-australia-looks-bit-odd-ross-de-rango-ubdcc/

It's perhaps worth noting that Jemena's final report on this project significantly overstated the risk posed by unmanaged at home charging by consumers, in a manner not supportable on the basis of the data collected – I unpacked this at the time[4] - but the core takeaway for the purposes of this waiver request is that DNSPs already have a clear pathway to orchestrating widely dispersed EV charging equipment, without needing to own it.

2. **Ausgrid network tariff EA964 (launched ~2023)**
   https://www.ausgrid.com.au/-/media/Documents/Regulation/Pricing/PList/Ausgrid-Network-Price-List-2024-25.pdf
   Ausgrid Tariff EA964 works on the basis that the customer gets very low per kWh pricing *almost all the time*, no capacity or demand charger, but a very high price per kWh during specific defined events, which they are expected (though not required) to respond to.

   For context, the difference in pricing is about two orders of magnitude: $0.0132/kWh for *normal usage*, $1.10/kWh for *critical peak* usage.

   Translated to an EV seeking a full recharge of 60kWh, this is the difference between 80c worth of energy-based network charges associated with the charging session, and $66 worth of energy-based network charges associated with the charging session.

   These critical peaks are limited to a handful of times per year, as determined by Ausgrid, and notified to the customer (that's the CPO in this instance, not the EV driver). When they occur, customers on these tariffs - such as some of the high power fast charging sites operated by Evie Networks - respond by turning the power of the public fast chargers down, in order to alleviate demand in that location at that time.

   Now, there's a question as to whether this is actually a good idea. It's very easy to imagine a circumstance where all the fast chargers in a coastal town are turned down at the same time, on a hot afternoon during the summer holidays, because all the charge point operators are on a network tariff like this, and they all get the same *critical price* signal from the same DNSP at the same time. For the purpose of the consideration of this waiver request, however, once again it's clear that DNSPs have a pathway to load management and orchestration, without dilution of ringfencing arrangements.

3. **United Energy's summer saver program (launched ~2015).**

   In the summer saver program, the consumer gets a text message with a request that they reduce their usage during a specified timeframe (an event), against a calculated baseline determined by the DNSP, from their household smart meter data.

   If post-event analysis indicates that they did, indeed, reduce their usage – they get a credit paid direct to their bank account. If they don't participate in a particular event, they don't get the reward.

[4] https://thedriven.io/2023/07/11/what-does-well-behaved-ev-charging-look-like/

This approach would be highly applicable to home EV charging, and potentially (with some slight variations) somewhat applicable to public EV charging – for example, it might be the CPO sending a message to their regular users of a particular charging station to limit their usage at a particular time if they can.

Importantly, it's an approach that requires no new physical infrastructure at the location, and no need for the DNSP to enter into the competitive markets around hardware ownership.

It's frankly concerning that a generalised demand response scheme of this nature, which has a ten year track record of demonstrably working without any hardware investment in the home beyond the smart meter, *has not* been rolled out more widely as an alternative to network augmentation.

For the avoidance of doubt: Citipower's head of new energy, Daniel Bye apparently told *The Driven* that the project is all actually about demand management[5], and his public commentary (shown in Appendix A) reflects this too. However, the most recent variation Citipower have provided the regulator says "the kerbside EVCIs will not initially implement active demand response"[6], so those claims are questionable.

My suspicion is that the purpose of the waiver request is not primarily to test load management capabilities. Per above, that's already completely possible for the DNSP to do, in multiple well proven ways, several of which are in active use - without the waiver allowing DNSPs to own the hardware being needed.

I believe the real purpose of the waiver request is to test the AER's processes, and the political environment influencing the processes, for issuing waivers that dilute or degrade ringfencing protections in favour of the DNSPs.

I believe that the goal of the DNSPs in this matter is to establish if the AER's waiver process might be used to enable DNSPs to enter this competitive space more widely, as they have already done with community batteries.

My belief in this matter is supported by what appears to be a strategy on the part of Citipower to make this waiver request through the media just before Christmas 2024[7], and in alignment with sustained advocacy work being undertaken by Energy Networks Australia, at a national level, along the same lines[8]. Ausgrid, Essential Energy, Endeavour, and SAPN have all made efforts along these lines recently.

For the avoidance of doubt, and to protect myself against a potential claim for injurious falsehood: where I say 'I believe', it's because I don't have proof. I'm not making a statement of fact, except that it's a fact that I believe these things.

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[5] **https://thedriven.io/2025/05/21/the-ev-kerbside-charger-showdown-why-this-fight-is-coming-to-your-street/**

[6] **https://www.aer.gov.au/system/files/2025-05/CPU%20-%20Supplementary%20Submission%20-%20Operating%20Model%20May%202025.pdf**

[7] https://www.theage.com.au/national/victoria/plan-mooted-to-install-electric-vehicle-chargers-on-power-poles-20241219-p5kznt.html

[8] https://www.energynetworks.com.au/news/media-releases/energy-networks-election-wish-list-includes-calls-to-remove-tax-on-landholders/

What about the model for driver engagement?

The proposed model for how the driver will engage with the EV chargers that Citipower wants to own, and who the enterprises involved are, is shown on page 2 of **this one**[9].

The two line title of the figure has five acronyms in it, and you've got to be a bit of an expert to understand it, but it's not really new. The French equivalent of the ACCC **published something**[10] very similar, a year ago, with a handy picture.

The reason the French competition regulator published this is that the emergence in Europe, over a period of years, of the kind of payment and operating model that Citipower are trying to bring about in Australia, resulted substantial consumer harm to EV drivers in Europe. Those harms lead to EU regulation that we don't yet have in place in Australia, because we haven't experienced the harms yet.

It's one thing to touch something sharp and then need a band-aid because you didn't know it was sharp....

....but if you watch a friend touch a sharp thing, and then bleed all over their floor, it's a bit silly to take your gloves off and reach hopefully for the same sharp thing.

It's especially silly to do that when you don't actually have any urgent need for the sharp thing, or know how to use it properly.

A better idea is to wait until your friend has patched themselves up, figured out how to handle the sharp thing without hurting themselves, and then ask them to show you how it's done – if it turns out that you actually need it in the first place.

The operating model proposed by Citipower is *at best* fraught with risk, as demonstrated overseas. This is an additional and independent risk, on top of the greater risk of allowing the monopolies to own public facing EV charging equipment in the first place.

To extend the analogy from the start of this article, relating to an imaginary monopoly trucking company moving to own some supermarkets:

Adding this model is equivalent to setting up a structure where the trucking company arranges for *multiple* preferred partners to sell goods from the same supermarket, that they own, in competition with each other.

Under this model, all of the preferred partners will be paying the transport company a percentage for each item of food sold, *and* they'll all be required to agree upfront that their right to continue doing business in that supermarket is contingent on adherence to the trucking company's rules - which may change at any time, for any reason, or for no reason at all, and without any requirement for public disclosure.

As an alternative, we could keep the status quo: the trucking company is required to stay in its lane and do its job.

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[9] https://www.aer.gov.au/system/files/2025-05/CPU%20-%20Supplementary%20Submission%20-%20Operating%20Model%20May%202025.pdf

[10] https://www.autoritedelaconcurrence.fr/en/press-release/charging-stations-electric-vehicles-autorite-issues-its-opinion-competitive

What might reasonably be done about all this?

The matter at hand is consideration of this waiver.

On the basis of the evidence, it should be rejected, because it isn't justifiable to provide a waiver to ringfencing when:

1) The learnings and technique development that the DNSP are claiming to be seeking are already well understood, proven in market, and functional without the need for dilution of ringfencing protections.
2) The operating model proposed has demonstrably harmed consumers in other jurisdictions, in a manner that required regulatory intervention to fix.

Methods for dealing with the broader issue of roles and responsibilities of the actors involved in public EV charging, and the obstruction of the competitive rollout of public EV charging by DNSPs, are beyond the scope of this submission.

Appendix A:

Public correspondence between Daniel Bye (Citipower), and Ross De Rango, in response to Ross' article on this matter.

Note in particular the marked sections, where Mr Bye objects in the **"most strongest terms"** to the suggestion that his employers have obstructed **"anyone"** from doing **"anything" -** despite the DNSPs holding total control over connection processes and FAA price setting - and then five hours later denies making the objection.

It's regrettable that one of the key proponents of this plan from Citipower does not consider public dialogue, with a community of industry and government stakeholders to be worthy of his time and would instead prefer to conduct these discussions face to face, behind closed doors - but sadly this is the quality of the public debate in this matter.

Daniel Bye • 2nd
Head of Customer Connections & Requests

3d •••

Thanks for sharing, Ross. There are some really good point here of which, I'd be happy to discuss with you face to face so the article can be updated to reflect "both sides of the fence".

It's important to remember here that FAA revenue doesn't belong to the DNSP. It's goes straight back to customers. The AER encourage DNSPs to utilise their assets for additional revenue to assist in keep DUoS costs lower, thus having keeping power prices lower.

It's also important to know, the FAA rates across the DNSPs is broadly aligned with each other with some DNSPs opting to discount the costs for EVCI. Something that CitiPower, Powercor and United Energy have done also. This is to assist the EVCI business in making their business case more viable.

My remaining point would be, we don't want to augment the network when we deploy these chargers at scale. What we want to test (amongst other things) is the ability to have a DNSP control the chargers output over the course of the day/night to ensure we don't overload the network and thus avoid the augmentation. Further, we want to see if there is a way to encourage customers to draw down on the network on days such as minimum demand days.

What we are asking for is not a full rule change

Like · 3 | Reply · 18 replies

Ross De Rango Author
Director - Vehicle Charging Solutions Australia

3d

Daniel Bye, I've engaged with several representatives of your employer over the years.

I've done this face to face, online, in meetings, in forums, by email, in working groups.... a multitude of times, on many issues relating to the rollout of EV charging infrastructure.

Progress on those issues has generally come (in those cases where it has come) from engaging with government and regulators, after engaging with your colleagues.

What Citipower are asking for here is a waiver of the rules, to allow Citipower to own something it is not currently allowed to own.

It's a waiver closely aligned with broader efforts being pushed by ENA and the NSW DNSPs, which, if successful, would disrupt the entire EV charging industry.

This alignment is clearly laid out in the AER's consultation documentation on your waiver request.

My remaining point is:

If you are only looking to test the things you're claiming in this post to want to test, you don't need this waiver at all.

Engage openly and honestly with the the businesses that *are allowed* to own this class of hardware, and test whatever you like.

Like · 5 | Reply | 306 impressions

Daniel Bye • 2nd
Head of Customer Connections & Requests

3d

Ross De Rango thanks Ross.

Reads to me that the engagement across DNSPs, CPOs and Government achieved a change that made it easier.

I'm in Sydney for the EV summit if you're attending and wish to discuss further.

The application to the AER is for 100 chargers across 3 DNSPs, not just CitiPower. This will enable valuable learnings for DNSPs and give customers access to chargers while also picking their preferred EMSP. This application isn't asking for a widespread dispensation of the rules.

This has been an open, honest and transparent application from the start and will continue to be. We are open for business now and will be in the future.

I am just as passionate about the transition to EVs as you are only trying to help the DNSP learn and unlock availability into the future.

Like | Reply

Ross De Rango Author
Director - Vehicle Charging Solutions Australia

3d

Daniel Bye ,

"Reads to me that the engagement across DNSPs, CPOs and Government achieved a change that made it easier."

that would certainly be one way to say it....

Like | Reply | 213 impressions

Michael Ferguson • 1st (edited) 3d •••
Renewable Energy Consultant at LONGi Green Energy Technol...

Daniel Bye There have been atleast two CPOs (probably more) who have been actively trying to negotiate FAAs with Citipower/Powercor/United for atleast 18 months with no success, however after your announcement late last year of the waiver application, progress? The cynic in me has a few theories. Feels like stonewalling.

Also it's understood that 'open for business' really means we've been dragged kicking and screaming by the minister to the table.
And that it is restricted to a very small number of locations for the private CPOs. Feels very like a margin squeeze.

Given that the AER sets the regulated revenue every five years in advance. It does not retrospectively review non regulated incomes such as from ancillary network services, shared assets, and FAAs, any additional income during the five years cannot not affect the DUoS units during this period, and therefore does not flow back to keeping prices lower. It just flows to the shareholders.

To the point of DNSPs owning EV chargers, batteries, or anything else behind the meter, any increase in your RAB will increase electricity prices.

Like · 4 | Reply

Ross De Rango Author 3d •••
Director - Vehicle Charging Solutions Australia

Michael Ferguson , and, there's the *other* way to say it....

Like · 3 | Reply | 162 impressions

Daniel Bye • 2nd
Head of Customer Connections & Requests

3d

Michael Ferguson thanks Michael. While I won't go into specifics (it's not appropriate to do so), the time is certainly a pain point for both sides of the fence. I will not shy away from that. What I can say more so is, this application and the contract negotiations with the other party's have no correlation. The "delay" would have existed either way.

Like | Reply

Edward Lynch-Bell • 1st
Zero Carbon Mobility For The 15 Minute City

2d

Daniel Bye or we could take the UK approach where there are no FAA fees for DNO infrastructure or lamp posts. We pay enough in distribution tariffs.

EVs EV charging, CPOs this is load growth = this is more revenue for DNSPs. With the right tarrif structure it's also highly flexible so it doesn't even have to add to LRMC. It can even help with unmanaged problems that cost consumers like over-voltage.

Like · 2 | Reply

Daniel Bye • 2nd
Head of Customer Connections & Requests

2d

Edward Lynch-Bell thanks Edward. So customers fund the installation and maintenance of infrastructure and then get nothing in return for the space??

Like | Reply

Edward Lynch-Bell • 1st
Zero Carbon Mobility For The 15 Minute City
2d

Daniel Bye nope - CPOs invest in the installation, cover their opex, including maintenance, TUOS, DUOS from energy and deliver a return on investment all from user fees. DNSP does the same recouping their investment in the pole and the infrastructure behind it from the tarriff paid on delivering the kWh to the charger.

The pole is in the rate base already, increasing the volume of kWh on the network should amortise the cost over the pole over more kWh so bring down the network tarriff. The customer already paid for it so let them get more use out of it.

I'll say it again, EVs are a massive opportunity for DNSPs to grow their revenues, so let's work together to make it happen in a fair and equitable way.

Like · 2 | Reply

Bernhard Conoplia • 1st
Creating sustainable EV public fast charging infrastructure
2d

Daniel Bye that's the DNSP proposed model. DNSPs don't pay the FAA that everyone else has to pay, which is one of the key arguments why DNSPs claim they can be cheaper and why it's not a level playing field. ie. to your point consumers get nothing in return for the space under the DNSP model. Have I missed something?

Like · 4 | Reply

Peter Warrington • 2nd
Manager, Transport Policy at City of Sydney
1d

Nik Midlam

Like | Reply

Brendan Jones • 2nd
Doing Interesting Stuff
22h

Edward Lynch-Bell - very well said. Particularly the part that the pole is in the rate base already. Is an FAA double-dipping? 🤔

Like · 2 | Reply

Ross De Rango Author
Director - Vehicle Charging Solutions Australia
21h

Brendan Jones , 'double dipping' implies that the second spoonful is about the same size as the first one..... not polite, but if I'm thinking about a tub of ice-cream in my freezer and my teenagers, it's something I might look past, if their recent behaviour has been good.

Extending the analogies, the level of FAA we're talking about here is more akin to a person not letting a new ice cream tub come out of the freezer until everyone in the house who might like a spoonful first agrees that the person who lets the tub out of the freezer is allowed first dibs at it, and can take as much as they like, before anyone else gets a taste.

....that's not behaviour that I'd be inclined to look past, were it my kids doing it.

Like · 1 | Reply | 22 impressions

Daniel Bye • 2nd
Head of Customer Connections & Requests

20h •••

Ross De Rango I'm not sure how it's double dipping when DNSPs got keep the money. Customers get the tub, not DNSPs. But I'll set that aside for my question below.

If this trial (and that's exactly what the proposal is, a trial of DNSP load management of chargers in a small scale) did not have the 100 chargers into the RAB, which has not been discussed from a funding perspective, you'd be more open to it?

All of this discussion has been about a wide scale rollout of DNSP chargers. Which is not what has been asked for.

All the chat has been on just say no. The bit I can't understand why the discussion can't be about enabling both to happen (trial of load management so we as a DNSP can learn more and 3rd party roll outs).

Side note, I'm not much of an ice cream fan. More of a sticky date pudding fan.

Like | Reply

Ross De Rango Author 16h

Director - Vehicle Charging Solutions Australia

Daniel Bye, my key objection here is the apparent attempt, on the part of your employer, to extend your monopoly into things you're not currently allowed to do, after obstructing competitive efforts along the same lines.

In the case of public facing EV charging equipment mounted on poles, at appears from NSW that if the DNSP refrains from blocking, then with a minor amount of government co-funding, the competitive market is well placed to do it.

If a monopoly wants to do something the competitive market *can* do... then the answer *should* generally be no.

Again, if what you want to try out is load management, you don't need to own the hardware. Just engage with the hardware owner (CPO) with a message to adjust output. You already have the upstream smart meter data for validation.

As to who's taking the tub- take a look at page 38 of this one:
https://www.parliament.nsw.gov.au/ladocs/submissions/89972/Submission%2020%20-%20National%20Electrical%20and%20Communications%20Association%20(NECA).pdf
That *appears* to indicate the thick end of $6 billion in super-profits to DNSPs over a ten year period in NSW, over and above the regulated return. $6 billion would buy a fair bit of ice cream.

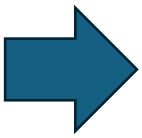
Like · 1 | Reply | 25 impressions

Daniel Bye • 2nd
Head of Customer Connections & Requests

16h •••

Ross De Rango when you say “minor” government funding, what is that %?

The least amount reported is 50%, the most we have seen is 80%. If those figures are correct, it’s hardly minor.



I’ll object in the most strongest terms that that we have “obstructed” anyone from doing anything.

If this makket was was well established, funding from governments and other agencies would not be required.

From what I understand the vast majority of pole mounted AC chargers that have been installed across NSWs and all proposed in VIC are funded in part (the vast majority) by tax payers.

Orchestration is needed both now and into the future. Not doing this now, will just be the solar industry all over again. Not learning today means customers will suffer. It’s clear the broader industry do not want DNSPs involved in the solution, which is a real shame as we are very much the biggest advocates for our customers, while enabling EMSPs and retailers to do what they do best.

Please feel free to reach out to my work email Ross if you and the industry would like to meet and discuss face to face.

Like | Reply

Ross De Rango Author

Director - Vehicle Charging Solutions Australia

11h

Daniel Bye, 'minor' as in single digit millions of dollars supporting hundreds of deployments of chargers of this novel type so far... compared to the billions of dollars spent by Australian consumers on ~100,000 new electric cars last year, and the hundreds of millions in support of high power fast chargers.

EV is a critical transition for the country, in a nascent stage. Government support of all sorts of things related to it is completely reasonable as the market scales up. It's competition, not monopoly ownership, that'll bring the costs of many of those things down such that the taxpayer support can be removed in most cases - noting that in some cases (like remote locations), some government support may be needed long term.

"early stage deployments need government support" is not a good reason to start weakening ringfencing provisions.

You are of course free to object to my observation that it appears your employer is obstructing competitive businesses trying to deploy public charging infrastructure.... I'd simply refer you back to my article.

And again - DNSPs don't need to own the hardware to do orchestration or load management.

Like · 1 | Reply | 24 impressions

Daniel Bye • 2nd
Head of Customer Connections & Requests

11h •••

Ross De Rango thanks Ross. I haven't objected because i dont see tye need to. No matter what i say, you'll disagree anyway. Not really worth the time to write it.

Thanks for your time posting on here.

I've made many offers to discuss further face toface. You have my email address, please send through some times that suit if you wish.

The one thing I do like. We do have some things in common. Both passionate about furthing EVs and electrification.

I look forward to your email.

Cheers
Dan.

Like | Reply