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2 December 2025

Parliament of Victoria
Legislative Council Economy and Infrastructure Committee
Parliament House, Spring Street
EAST MELBOURNE, VIC, 3002

Dear Ms Allan

Re: Inquiry into Electricity Supply for Electric Vehicles

The Australian Energy Regulator (AER) welcomes the opportunity to provide a submission to the Parliament of Victoria's Committee Inquiry into Electricity Supply for Electric Vehicles.

The AER is an independent statutory body responsible for regulating energy networks and wholesale and retail energy markets under national energy legislation and rules. We have a responsibility for provisioning the necessary tools to help integrate EV load into the electricity system efficiently and assisting the rollout of EV charging infrastructure.

Electric vehicles (EVs) can play an important role in the efficient reduction of greenhouse gas emissions while supporting system stability, ensuring consumers pay no more than necessary for their electricity bills. However, when a high concentration of EVs charge simultaneously, especially during peak periods when the electricity network is under the most stress, the resulting hike in network demand can necessitate capital network investment (ultimately paid for by all consumers). Managed EV charging, whereas can help alleviate capital expenditure required to manage system constraints by moving EV charging demand away from peak periods and into times when the energy system is less utilised. Increases in network utilisation during off peak periods reduces system costs, with these cost savings passed onto energy consumers in the form of lower electricity bills, ensuring they are paying no more than necessary.

As the national economic energy regulator, the AER has an important role in facilitating the integration of EVs into the grid. We do this through a number of functions:

- **Regulating revenues and tariffs of monopoly electricity distribution businesses known as Distribution Network Service Providers (DNSPs)** who own and operate electricity distribution networks.

- **Administering the ring-fencing framework**, which restricts regulated energy networks' activities in contestable markets to guard against the risk of the monopoly businesses harming competition in downstream or upstream markets.
- **Administering the regulatory sandboxing function** to grant time-limited waivers exempting innovative trial projects from complying with specified energy laws and rules.

Most relevant to our functions, our submission responds to the following topics in the inquiry's Terms of Reference:

- the best role for electricity distribution businesses in rolling out EV charging infrastructure, and how distribution network tariffs should be set for EV chargers, and
- strategies to reduce EV charging during periods of peak demand on the grid and increase charging during periods of peak supply.

We have also included an attachment (Attachment A) to our submission which expands upon on the points raised in our discussion below.

The role for electricity distribution businesses in rolling out EV charging infrastructure

The AER has a role in administering the regulatory framework under which DNSPs operate to promote the long-term interests of all energy consumers.

Under the regulatory framework, the activities and revenues of DNSPs are subject to regulation by the AER, to ensure that parties seeking to connect to networks are able to do so on reasonable terms and conditions, and that charges for network services are consistent with the prudent and efficient delivery of network services.

Importantly, the AER's Ring-fencing Guideline prevents DNSPs undertake activities outside of their regulated network services without a waiver from the AER. The Ring-fencing Guideline seeks to ensure there is a separation of DNSPs regulated and competitive business activities, guarding against the risk of cross-subsidisation and discrimination that could harm competition in the non-regulated market.[1] Installing, owning and operating EV charging infrastructure are non-network (or contestable) services.

DNSPs hold unique data on network capacity, which is advantageous in investment planning for EV charging infrastructure, and are responsible for setting connection requirements and access fees to parties wishing to connect EV charging infrastructure to the electricity network. If a DNSP is permitted to install, own and operate EV charging infrastructure, it would have the ability to use these advantages unfairly to stifle the development of a competitive EV charging market, which could have negative long-term impacts for consumers. Therefore, a DNSP will need to obtain a waiver from obligations under the Ring-fencing Guideline to be able to own or operate EV charging infrastructure.

Ring-fencing waiver applications from DNSPs to install, own and operate EV charging infrastructure are considered by the AER on a case-by-case basis, and involve consideration of the costs and benefits of permitting a DNSP to undertake activities otherwise prohibited by the Guideline.

[1] AER, *Ring-fencing Guideline Electricity Distribution Version 4*, February 2025

On 23 October 2025, the AER granted a ring-fencing waiver to CitiPower, Powercor and United Energy (collectively, CPU) to enable CPU to conduct a kerbside EV charging trial until mid-2031, with strict conditions to safeguard competition and maximise trial learnings. The waiver will allow CPU to install up to 100 EV chargers (which must include at least 5% vehicle-to-grid chargers) in Victoria. The AER considered the trial will have the benefit of being able to test, analyse and publicly report on how kerbside EV charging can be used to manage local network constraints, improve voltage stability, and shift demand away from peak periods.

In granting CPU's waiver, the AER has imposed 9 conditions to maximise demand management learnings for addressing network risks and consumer behaviour, while minimising potential competition impacts. These conditions impose requirements on the design of the trial, obligations to ensure a level playing field for third parties (including charging itself the same pole access fees it charges third-party providers) and require transparent reporting both publicly and to the AER.

In parallel to this waiver decision, the AER also considered what regulatory arrangements should apply for the connection of EV charging infrastructure to poles owned by Victorian DNSPs. In the draft determinations for the upcoming regulatory period (2026-31), we have proposed to classify pole access for kerbside EV charging as a negotiated distribution service. This means a party seeking access to a DNSP's network to install EV charging infrastructure will be able to refer a dispute over access terms to the AER for resolution.

Separate to the Ring-fencing Guideline, the AER can consider innovative ideas through our trial waiver functions and regulatory sandboxing (this is open to all energy innovators – including DNSPs and other regulated entities).[2] For example, in March 2025 the AER granted a technical trial waiver under the regulatory sandboxing function that will enable PLUS ES to trial an innovative metering solution for pole-mounted kerbside EV chargers that improves the efficiency and cost of public EV chargers.

More detailed information on the AER's regulatory frameworks and their interaction with the roll out of EV infrastructure mentioned is provided in Attachment A.

Setting distribution network tariffs for EV chargers to reduce EV charging during periods of peak demand on the grid and increase charging during periods of peak supply

The AER plays an important role in regulating network tariffs that DNSPs charge for use of their networks. Network tariffs apply to customer connection points and apply to the retailer responsible for that connection point. Whether an end customer pays a particular network tariff depends on the agreement between the retailer and the end customer.

Each DNSP submits a tariff structure statement (TSS) to the AER every five years as part of their revenue proposals, which the AER approves. TSSs describe the tariffs DNSPs set to recover their revenue and include, for example, tariff structures, tariff assignment policies and strategies to progress tariff reform. DNSPs submit prices to the AER for each of their tariffs annually (through annual pricing proposals), which the AER assess for consistency against approved TSSs.

Well-designed network tariffs, potentially combined with a level of external control and smart devices, can help to manage the impact of EV charging on our electricity networks (e.g., charging in off-peak times), saving all electricity customers money in the form of lower bills.

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[2] AER, *Regulatory sandboxing - Energy Innovation Toolkit*

Cost reflective network tariffs can aid the development of innovative retail tariffs aimed at managing demand from EV charging, and we support cost reflective network tariffs for connection points with smart meters. In most jurisdictions in the NEM, the AER has approved default assignment to cost-reflective tariffs for these connection points.

Conversely, customers of Victorian DNSPs can opt-out of the approved cost reflective default network tariff (which will be 'solar soak' tariffs with low prices during the middle of the day from July 2026) *unless they have a dedicated EV fast charger*. However, implementation of this tariff structure has been limited as there is currently no way for Victorian DNSPs to identify customers of this type, meaning there are still many EV owners that will be able to opt-out to flat network tariffs.

The AER also considers that EV charge point operators (CPO) should face cost reflective tariffs. Public charge points can draw large volumes of electricity from the local network in a short time, potentially putting significant pressure on local assets. However, the AER has also supported consistent access to a time-of-use (TOU) tariff in the NEM for some CPOs while their annual consumption is low, and recent decisions have reflected this support.[3]

In addition, the AER has approved and supports two-way tariffs in other jurisdictions (NSW, SA) and is in the process of assessing proposed two-way tariffs in Victoria. Two-way tariffs can facilitate the uptake of bidirectional EV-charging by allowing customers with V2G-enabled EVs to benefit from export rewards.

We encourage DNSPs to trial innovative tariffs / sub-threshold tariffs that use dynamic and/or locational charges and rewards to manage EV charging. Examples of such tariffs include AusNet's flexible EV tariff trial (with rebates offered to customers who respond to event notifications) and Ausgrid's critical peak price residential and small business EV tariff trials. The regulatory framework enables DNSPs to conduct network tariff trials during regulatory periods.

Further information on distribution network tariffs and the role they can play in shifting flexible demand, such as EV charging, can be found in Attachment A.

Continued engagement

We appreciate the opportunity to assist in the work of this inquiry, and we are available to discuss any comments further or answer any questions the Committee may have. George Huang can be contacted via email at [redacted]

Yours sincerely

[redacted]

Justin Oliver
Deputy Chair

Sent by email on: 02.12.2025

[3] For example, our draft decision on Ergon Energy and Energex's 2025-30 TSSs required the DNSPs to offer TOU tariffs for business customers, including CPOs, with demand greater than 120 kVA and consumption less than 160 MWh per annum – see pp. 38 – 41.

December 2025

Attachment A

This attachment provides detail on the following:

- The regulatory treatment of EV charging services;
- The role that network tariffs can play in shifting EV charging demand away from peak periods;
- Opportunities the AER's regulatory sandbox provides to trial innovative strategies to shift EV demand;
- Work undertaken by the AER to promote EV charger connections; and
- Broader policy work being undertaken by the Commonwealth and jurisdictions which are related to the Terms of Reference of the Victorian EV parliamentary inquiry.

Regulatory treatment of EV charging infrastructure

Distribution Network Service Providers (DNSPs), as the owners of electricity distribution networks, can play a key role in enabling the rollout of EV chargers. DNSPs hold unique data on network capacity, which is advantageous in investment planning for EV charging infrastructure. DNSPs are further responsible for imposing connection requirements and access fees, which could facilitate its involvement in EV charging and metering. As EV charging infrastructure is a contestable service, National Energy legislation and rules, and AER guidelines (the regulatory framework) seeks to ensure a level playing field and help facilitate the growth of contestable markets. DNSPs seeking to provide EV charging infrastructure must therefore comply with the requirements in the regulatory framework.

The type and extent of economic regulation applied to each service undertaken by a DNSP depends on how those services are classified. Where a service is not considered a regulated service, ring-fencing arrangements will apply. The AER's consideration of service classification for EV charging related services, ring-fencing waivers and classification requests are discussed below.

Service classification

Service classification determines whether a service is considered a regulated distribution service. Under the regulatory framework, distribution services that are classified as regulated can be provided by DNSPs, who can recover the prudent and efficient costs of providing such services from their customer base. Service classification decisions are made as part of

our revenue determinations for each DNSP every five years.

The National Electricity Rules (NER) set out a series of considerations we must have regard to in classifying a service as either:[4]

- a direct control service, which as the term suggests, will be subject to direct controls over recoverable revenue and/or prices
- a negotiated distribution service, which is not subject to revenue or price controls and are instead negotiated between the DNSP and customers (or energy retailers as customer representatives) with the AER available to arbitrate disputes

The provision of EV charging infrastructure services are not currently considered a distribution service, and the future status of this classification is undecided.[5] Therefore, DNSPs cannot provide EV charging services, or EV chargers (i.e., the physical kit that provides electricity to EVs), unless the AER grants a ring-fencing waiver (discussed further below).

The AER has previously considered classifying EV charging of last resort as an alternative control service.[6] SA Power Networks (SAPN) requested this classification for the 2025-30 regulatory period to enable it to provide, construct, and maintain EV charging infrastructure requested by a third party in situations where the contestable market could not.[7] The AER ultimately did not accept this request in our final decision as we did not find a material change in circumstances that would justify the proposed service classification (such as a material change in general demand EV charging infrastructure services). We considered the proposal would have benefited from earlier and wider stakeholder engagement and better supporting information to enable us to make an informed decision in the long-term interest of consumers.

It is important to recognise the distinction between DNSPs providing EV charging services or EV chargers themselves, and DNSPs providing access to their power poles for third party-owned EV charging infrastructure. Although under no obligation to do so, DNSPs are permitted to lease pole access to third parties, and this is already happening in practice. On 30 September 2025, we released our draft decision to classify the following new negotiated distribution service, to support negotiation of access to Victorian DNSPs' kerbside poles on terms that are fair, reasonable and cost reflective:[8]

> "Distribution asset rental: Rental of distribution assets (e.g. poles) to third parties for the installation of electric vehicle (EV) chargers or associated hardware".

We have seen widespread third-party interest in using DNSP-owned infrastructure, power poles, as a host for non-DNSP equipment. Our draft decision responds to concerns raised by prospective providers of kerbside EV chargers have raised concerns with us about their ability to rent DNSPs' kerbside poles for EV charging infrastructure – including variability

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[4] NER, cl. 6.2.1(a).

[5] NER, chapter 10, glossary. The NER defines a distribution service as a service provided by means of, or in connection with, a distribution system

[6] An alternate control service is a subclass of direct control services and are initiated by and attributable to specific customers.

[7] SA Power Networks, *2025-30 Revised Regulatory Proposal Overview*, December 2024, p. 32.

[8] AER, *Attachment 11 – Service classification: Draft decision – AusNet Services, Jemena, CitiPower, Powercor and United Energy distribution determinations 2026-3*, September 2025.

across DNSPs, transparency and fairness of access pricing and other terms of pole leasing arrangements. Under the national regulatory framework, the Victorian DNSPs may respond to our draft decision in their revised regulatory proposals. We will release our final decisions on the 5 Victorian DNSP revised proposals in April 2026.

Ring-fencing and waivers

Ring-fencing refers to the separation of regulated services provided by a DNSP from other business activities that could be provided by contestable markets – which include the provision of EV charging infrastructure or services. All DNSPs must comply with the AER's Ring-fencing Guideline (electricity distribution).[9] The objective of the Guideline is to promote the National Electricity Objective (NEO) by preventing harm to the development of competition in contestable markets for other services.

Our Ring-fencing Guideline sets out the specific obligations applicable to DNSPs in line with ring-fencing rules including regular reporting of compliance. A DNSP may apply in writing to the AER for a waiver of its obligations under the Guideline.[10] In considering a waiver application, the AER must have regard to: the NEO; potential for cross-subsidisation and discrimination in favour of its related entity (including that part of its business that delivers the contestable business activity); and whether the benefit from the DNSP complying with ring-fencing obligations are outweighed by the cost to the DNSP of complying with that obligation. The AER may grant the waiver subject to conditions it considers appropriate, grant an interim waiver subject to conditions it considers appropriate, or refuse to grant the waiver.

CPU's trial waiver for kerbside EV charging

On 22 October 2025, the AER granted a time-bound, limited scope ring-fencing waiver to CitiPower, Powercor and United Energy (collectively, CPU), to enable CPU to conduct a kerbside EV charging trial at sites that meet specific criteria in Victoria until mid-2031, with strict conditions to safeguard market competition.[11] The waiver will allow CPU to install up to 100 EV chargers (which must include at least 5% vehicle-to-grid chargers (V2G)[12]) to test, analyse and publicly report on how EV charging can be used to manage local network constraints, improve voltage stability, and shift demand away from peak periods.

The decision to grant the waiver was made following extensive stakeholder consultation. In the first half of 2025, we held three public stakeholder workshops, released a consultation paper as part of the initiation process (we received 36 formal stakeholder submissions[13]) and published anonymised transcripts from the workshops. During the consultation process,

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[9] AER, *Ring-fencing Guideline Electricity Distribution Version 4*, February 2025

[10] DNSPs can apply in writing to the AER for a waiver of its obligations under clauses 3.1, 4.2 and / or 4.4.1(a) of the Ring-fencing Guideline.

[11] The trial is subject to requirements on site selection, competitive neutrality, transparency in processes and publication of learnings.

[12] Vehicle-to-grid refers to the process where EVs connected to the grid can supply power back to the main electrical system.

[13] See the AER's consultation webpage for this waiver for all mentioned consultation documents and submissions.

stakeholder's raised concerns about barriers in CPU's process for managing pole access requests, which have contributed to the slow pace of EV charger roll out in Victoria. In response, the AER proposed to classify pole access for kerbside charging as a negotiated distribution service (as discussed above). This proposed change provides greater AER regulatory oversight of CPU's conduct with relation to third party requests for access to its distribution poles.

Stakeholder submissions to our consultation also reflected diverse perspectives about the need for DNSP intervention in public EV charging. The submissions presented a diversity of views, from strong support for a learning-focused trial (subject to safeguards) to strong opposition citing risks to competition and consumer outcomes, particularly in high value urban locations. The AER understands there to be several EV charging operators in Australia, and that there is a competitive, albeit nascent, market emerging for public EV charging services. However, we have also heard there are material gaps in suburban and regional areas where commercial rollout is yet to establish, noting high capital costs, low utilisation and site-selection complexity as barriers. Gaps remain in the availability of convenient public charging infrastructure, particularly in urban and regional areas where access to off-street parking is limited.

Within this broader policy context, by facilitating charging infrastructure in locations where it may not otherwise emerge quickly, the CPU trial, subject to conditions which mitigate competition impacts, has the potential to contribute to national decarbonisation objectives by addressing these availability gaps and supporting efficient, equitable access to public EV charging. Another benefit of the CPU trial is the network learnings that could be gained from leveraging the EV charging infrastructure for demand management. CPU would be able to gain network insights into demand response, tariff design, and modulation of EV chargers to manage local network impacts. With knowledge of the effectiveness of measures to mitigate local network impacts, CPU and other network businesses could be better placed to expand the number of poles that can accommodate EV chargers without requiring network augmentation. Network learning benefits are amplified where the results are transparently published and treated as public goods – as is a requirement of this waiver.

Network tariff structures can help manage impact of EV charging on electricity network

Well-designed network tariffs are a low-cost mechanism to manage EV flexible load to provide network (and broader energy system) benefits and to mitigate future network costs. Such tariffs can incentivise EV charging during periods of peak supply and decrease EV charging during periods of peak demand. Effective price signals can result in lower bills for customers who can charge their EVs during low-priced periods, such as overnight or during the day when there is high solar generation. Further, many customers shifting EV charging away from peak demand times can mitigate the need for network investment in future regulatory periods and therefore contribute to lower network costs, reducing the network bills for all customers.

Effective management of flexible load, such as EV load, provides substantial benefits for both the border energy system and customer bills, as demonstrated by a wide range of

forecasts and studies. For example, the Australian Renewable Energy Agency (ARENA) commissioned NERA to undertake a study and publish a report on valuing flexibility in the National Electricity Market (NEM). For a state of the world with high consumer energy resources (CER) uptake, electrification and high EV uptake, NERA noted that flexible load could have a net present value $18 billion of cost savings, with the largest proportion of value from managed residential EV charging and behind-the-meter batteries.[14]

The AER supports customers with EVs facing network tariffs that reflect the impact (and potential benefits) of their use on the network. Peaks in demand (which EV charging can contribute to) traditionally drive network augmentation and increase costs, though troughs in demand (which EV charging can help fill) are more recently contributing to network costs. We consider that a range of tariff and non-tariff options can support efficient use of the network – including time-of-use (TOU) pricing, two-way pricing for V2G capable EVs and optional distributor or retailer-led control of charging.[15] We also encourage more innovative optional tariffs that use dynamic and/or locational charges and rewards to manage EV charging. For example, AusNet's flexible EV tariff trial (with rebates offered to customers who respond to event notifications) and Ausgrid's critical peak price residential and small business EV tariff trials.

Evidence shows that TOU tariffs can effectively influence EV charging behaviour. AGL's Electric Vehicle Orchestration Trial report found that EV customers on TOU tariffs are already responding to TOU windows even outside the confines of the trial, and shifting their charging to off-peak times.[16] Additionally, findings from Origin Energy's report on its EV smart charging trial show that EV owners are willing to change their charging behaviour in response to price signals, and that financial incentives reduced the proportion of charging occurring at peak times by 20%.[17] The report also notes that opt-in third party control of charging decreased charging in peak periods by an additional 4% on top of the price response.[18]

The AER supports distributors' assignment of all residential and small business customers with EVs to their default TOU network tariffs with 'solar soak' (low to zero distribution prices during the middle of the day) periods as these tariffs allow these customers to:

- benefit from shifting charging to low-priced periods during the day or overnight, or
- pay a contribution reflecting future network augmentation needed if they choose to charge during peak periods (mitigating the recovery from non-EV owners for future network augmentation driven by EV charging).

As part of our draft decision for the 2026-31 Victorian distributors' tariff structure statements, we approved their proposed default TOU tariffs with solar soak periods. We note that in Victoria, residential and small business customers with dedicated EV chargers cannot opt-

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[14] NERA Economic Consulting, *Valuing Load Flexibility in the NEM*, February 2022.

[15] Time-of-use pricing refers to where the prices change depending on the time of day (i.e., peak and off-peak times) to reflect times of high and low demand on the network. Additionally, two-way pricing refers to pricing options for both the export of energy and can include export charges and negative pricing/ rewards.

[16] AGL, *AGL Electric Vehicle Orchestration trial – Final Lessons Learnt Report*, May 2023, p. 5.

17 Origin Energy, *EV Smart Charging Trial, Lessons Learnt Report*, May 2022, p. 9.

18 Origin Energy, *EV Smart Charging Trial, Lessons Learnt Report*, May 2022, p. 11.

out of these tariffs to flat tariffs. However, there is currently no mechanism to identify these customers. We encourage the Victorian Government to expedite creating a formal mechanism to identify these customers, so that they can be assigned to solar soak tariffs that better reflect their use of the network. Additionally, the Victorian Government could engage with the Electric Vehicle Council's suggestion that Energy Safe Victoria could add a checkbox to their Certificate of Electrical Safety so that an electrician can easily indicate that an EV has been installed.[19]

The AER considers that EV charge point operators should face tariffs that reflect their use of the network, and, similar to small customer tariffs, that a range of tariff designs are able to send appropriate price signals. For charge point operators consuming up to 160 MWh per annum, we support a consistent approach to TOU tariff availability for EV chargers across the NEM i.e., allowing them access a TOU tariff even if default assignment may be to a demand tariff. We consider that while the EV industry is in its infancy, a consistent approach on access to a TOU tariff could increase the confidence of charge point operators (and potential investors) to extend their charging networks. Consistent network tariff structures would also assist charge point operators to roll out more consistent charging structures for their customers. We will review this position in future decisions. For EV charge point operators consuming over 160 MWh per annum, we consider demand-based tariffs are appropriate, and these customers can manage their demand, for example, by installing batteries. We also encourage further trials for these customers, such as locational or critical peak pricing.

Opportunities to explore strategies to manage EV charging impacts on electricity network via regulatory sandboxing

The Energy Innovation Toolkit is a free service offered by the AER in collaboration with the Australian Energy Market Commission (AEMC), AEMO, ARENA, and the Essential Services Commission (ESC). In February 2025, the Energy Innovation Toolkit released guidance on policy-led sandboxing. Policy-led sandboxing invites large-scale trial ideas within the AER's areas of focus or "buckets".[20] These included focus areas of flexible metering and EV charging and of network-led orchestration, outlined below, which may be relevant to this inquiry.

Bucket 3: Flexible metering and EV charging

Can the metering regulations better accommodate CER and EV Charging?

- Solutions that allow EV customers to pay one dedicated retailer remotely (rather than multiple charge point operators).
- Other technical metering trials to lower the costs of installation and incentivise greater uptake.

[19] The EVC, *Submission on Victorian Electricity Distribution Proposals 2026-31*, May 2025, p. 6.
[20] AER, *Policy-led sandboxing*, February 2025.

- This could help test how to target EVs and other sources of CER/load with potentially the greatest bang for buck in terms of impact because of their size or flexibility.

Bucket 1: Network-led orchestration or coordination

Can, and should, DNSPs enable access to, and deployment and orchestration of, DER/CER?

- Test different models of DNSP-led CER access, deployment and orchestration.
- Test price signals versus direct control to drive DNSP-led CER orchestration.
- This could help test the benefits and risks of the relationships involved in this model, how value can be shared and what the consumer response is, including in terms of trust.

Following the AER's call for trials in these focus areas, a number of proponents have approached the AER to discuss or lodge proposals. Several of these proposals relate to aspects of EV charging and metering. These potential sandboxing trials could allow for the testing of new technology in these fields, with metering innovations emerging as a forefront of innovations for how to make the installation of EV charging infrastructure more cost-effective and accessible to the broader market (and therefore, customers).

In March 2025, the AER granted a trial waiver to Plus ES, waiving adherence from 2 clauses of the NER relating to metering requirements.[21] The trial allowed PLUS ES to package metering and charging elements in a single EV charging unit, installed on leased DNSP's power poles and streetlights.

The trial allowed PLUS ES to install 1,000 pole-mounted EV chargers in NSW and South Australia to allow greater access to EV charging for EV owners without private charging access and develop learnings to support the 'Unlocking CER benefits through flexible trading' rule change. PLUS ES expects the trial to reduce upfront capital costs of EV charger installation. In consideration of the trial rule change the AER received submissions from 16 stakeholders, assisting the AER in developing appropriate conditions to address market concerns.

Broader AER work to promote EV charger connections

Network Visibility

The AER's Low-voltage Network Visibility project is designed to assist with the connection and operation of DER such as EV chargers by providing better access to and quality of low-voltage network data, which enables organisations to identify appropriate sites and understand network constraints for their installation. There is currently an information asymmetry between DNSPs and EV charging proponents seeking to access DNSP assets, including a lack of transparency and/or external comparators or benchmarks for the costs of providing asset rental services. This makes it difficult for a commercial EV charging provider

[21] AER, *PLUS ES trial waiver: Final decision*, March 2025.

to test and verify, and therefore to challenge, the cost reflectivity of prices offered by a DNSP for distribution asset rental services.

Improved access to data can improve the ability of third parties to be informed and make appropriate decisions about their investments and distribution networks. As part of the AERs' waiver decision for CPU (as discussed earlier in this submission), we encouraged CPU to improve its network visibility to support the kerbside EV charging industry, by publishing information on pole suitability and available capacity in a user-friendly, accessible manner. Availability of this information can reduce a significant information barrier that hinders third-party EV charger rollout.

In March 2025, the AER published our Low-voltage Network Visibility Phase 3 Final report, which identifies the actions we will take to ensure distribution networks are transparently providing information to key stakeholders and the public.[22] For example, we committed to supporting key elements of the integrated distribution system planning rule change proposal by the ECA that proposed the DNSPs to undertake a more comprehensive planning review over a longer planning horizon, increase transparency of hosting capacity and improve visibility of priority network data. Building on this action, we provided key insights regarding the most useful datasets to be made available, such as those relating to import, export network connection capabilities, and how they should be made available.

The AER and the EV charging connection framework

As part of our role in connections[23], the AER has been working with Department of Climate Change, Energy, the Environment and Water (DCCEEW) and the CER Working Group on a project to identify opportunities to streamline the connection of EV charger stations and large CER.[24] The group is currently assessing recommendations that offer the most potential for streamlining the connections process.

CER Roadmap initiatives

The National CER Roadmap published by Energy Ministers set out an overarching vision and plan to effectively integrate CER into the grid to help with more reliable, secure and cheaper energy.[25] The CER Roadmap contains a number of workstreams which relate to EV charging which may be useful for the inquiry to consider, such as the review of minimum operating standards for government supported public electric vehicle charging infrastructure. As part of the CER Roadmap, jurisdictions have also agreed to review their own technical or regulatory frameworks and remove barriers for consumer adoption of V2G opportunities.

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[22] AER, *Low-voltage Network Visibility Phase 3 Final Report*, 31 March 2025.

[23] Under the NER (including 5.3 and Chapter 5A) the AER has responsibility to resolve disputes where a customer is not satisfied with the offer it has received. This resolution framework is available to providers of EV charging infrastructure. The AER also approves connection policies of DNSPs.

[24] Department of Climate Change, Energy, the Environment and Water, Streamlining the connection of Electric Vehicle Supply Equipment (EVSE) and large Consumer Energy Resources (CER) – Options Paper for consultation, 26 August 2024.

[25] Energy and Climate Change Ministerial Council, *National Consumer Energy Resources Roadmap Implementation Plan Update*, DCCEEW, August 2025.

Complementary work that supports the CER Roadmap includes the ARENA and RACE for 2030 (RACE) commissioned National Roadmap for Bidirectional EV Charging.[26] The roadmap sets a path to achieving commercial adoption of bidirectional EV charging in Australia and achieving electricity market benefits.[27]

[26] ARENA and Race for 2030, *National Roadmap for Bidirectional EV Charging*, 12 February 2025.

[27] Bidirectional charging refers to the process where electricity flows in both directions between an EV and an external energy system, such as the grid or a home.