

Consultation paper

Ring-fencing waiver application for an EV
charging infrastructure trial from Essential Energy

June 2026

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Contents

- 1 Introduction 1**
 - 1.1 Essential Energy’s waiver application..... 1
 - 1.2 The ring-fencing framework..... 2
- 2 Consultation process 4**
 - 2.1 Scope of this consultation 4
 - 2.2 How to make a submission 5
 - 2.3 Public stakeholder engagement workshop 6
 - 2.4 Timeline 6
- 3 Key consultation areas 8**
 - 3.1 National Electricity Objective 8
 - 3.2 Potential for cross-subsidisation and discrimination 9
 - 3.3 Likely benefits to consumers vs likely costs to Essential Energy from ring-fencing compliance 10
 - 3.4 Duration and information sharing 11
- 4 Summary of questions 13**

1 Introduction

1.1 Essential Energy’s waiver application

On 20 April 2026, the AER received a [ring-fencing waiver application from Essential Energy](#) to support its proposed, ARENA-funded, ‘Plug and Play’ trial. Essential Energy is planning to install, maintain and lease 300 kerbside EV chargers in regional NSW.¹ The 300 EV chargers would be in a ‘recessed charging port’ within composite streetlight and distribution poles. In this model, the charger and metering are embedded within the network asset, rather than externally attached to timber poles as in a conventional pole-mounted charger design.²

Essential Energy is requesting a waiver until 30 June 2033 from 2 clauses in the Ring-fencing guideline (electricity distribution) (‘the guideline’): clause 3.1(b) – provision of other services, and clause 4.2 – functional separation of offices, staff, branding and promotions. If granted, this waiver would allow Essential Energy to lease the EV charging infrastructure within the composite pole to charge point operators, and to use its staff to maintain the equipment for the duration of the waiver (proposed expiry on 30 June 2033). Leasing the EV charging infrastructure is a contestable service, and the ring-fencing guideline otherwise prohibits Essential Energy from providing these services absent a waiver.

Essential Energy’s role would be limited to infrastructure ownership, installation, maintenance (including fault response) and leasing of the charging infrastructure. Retail charging services (pricing, billing, customer engagement) would be delivered by charge point operators. Essential Energy has proposed that the trial would begin with a single charge point operator per charger. Essential Energy has suggested that granting this waiver would help meet the needs of regional NSW, which it believes is under-serviced for public EV charging infrastructure. The chargers would be installed in locations where “commercial deployment has not occurred”,³ and limited to sites where poles are being replaced at end-of-life as part of an existing asset replacement program.

The ARENA-funded ‘Plug and Play’ trial includes two streams. This waiver application, for leasing 300 EV chargers embedded in composite poles, relates to stream 2. Stream 1 focuses on reducing site-selection and connection barriers across 1,000 poles to make sites charger-ready for third-party EV charger deployment. Essential Energy states that there are only 20 active pole-mounted chargers across its distribution area, which covers most of regional NSW, with only a small number installed west of the Great Dividing Range.⁴ The two-streams of the trial are intended to provide a controlled comparison: stream 1 tests whether reducing connection barriers for third-party owned chargers is sufficient to stimulate

¹ The EV charging infrastructure described in Essential Energy’s application (charging station and metrology) is akin to what is referred to in the EV industry as EV supply equipment (EVSE).

² For an image of the embedded chargers in composite poles, see Essential Energy, *Application by Essential Energy to participate in the ARENA Plug and Play Electric Vehicle Charging Infrastructure funding trial*, 20 April 2026, p.39

³ Essential Energy application, p.5.

⁴ Essential Energy application, p.42

market participation; while stream 2 tests whether DNSP-owned shared infrastructure is needed in locations where stream 1 is insufficient.

We are seeking stakeholders’ views on Essential Energy’s waiver application to support the AER’s assessment of whether to grant this waiver and, if so, the associated duration and conditions. This consultation paper sets out some of the considerations the AER will have regard to in deciding whether to grant a waiver, and the questions we are calling for stakeholder feedback on. The AER also invites stakeholders to attend a workshop during the consultation period.

1.2 The ring-fencing framework

The National Electricity Rules (NER) provide a framework for implementing a national approach to electricity ring-fencing. The objective of ring-fencing is to provide a level playing field for third party providers in new and existing markets for contestable services. It does this by restricting distribution network service providers (DNSPs) from offering contestable services and mitigating the advantage a DNSP may otherwise have in providing those services as the monopoly provider of regulated distribution services.

The AER is required to establish the guideline under the NER. The guideline is binding on all DNSPs, and comprises several components through which we can establish a 'ring-fence' between a DNSP’s provision of regulated distribution services and other business activities that could be provided by a contestable market. This is achieved via provisions to mitigate the risk of cross-subsidies and discrimination, restrictions on waivers, and reporting and compliance requirements for DNSPs. The guideline establishes obligations around legal, accounting and functional separation to address these two key potential harms.

DNSPs can apply to the AER for waivers to some of the obligations set out in the guideline,⁵ and clause 5.3.2. specifies that in deciding whether to grant, vary or revoke a waiver, the AER must have regard to:

- the National Electricity Objective (NEO) as stated in the National Electricity Law, which is to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers of electricity with respect to:
 - price, quality, safety, reliability and security of supply of electricity; and
 - the reliability, safety and security of the national electricity system; and
 - the achievement of targets set by a participating jurisdiction, including for reducing or contribute to reducing, Australia’s greenhouse gas emissions;
- the potential for cross-subsidisation from revenue earned from provision of regulated distribution services;
- the potential for discrimination where a DNSP confers a competitive advantage on its related service providers that provide contestable services; and

⁵ Core ring-fencing obligations for cost allocation, separate accounts, non-discrimination and information protection cannot be waived.

- whether the benefit, or likely benefit, to electricity consumers of the DNSP complying with the obligation (including any benefit, or likely benefit, from increased competition) would be outweighed by the cost to the DNSP of complying with that obligation.

Additionally, the guideline provides that the AER may have regard to any other matter it considers relevant, and can also impose conditions when granting a waiver to mitigate risks and maximise benefits that can be achieved from the waiver. The AER evaluates the claims the DNSP’s waiver application makes against these criteria, and is guided by the consideration of likely impacts from granting the waiver on contestable markets.

2 Consultation process

2.1 Scope of this consultation

We are consulting on Essential Energy’s waiver application to understand stakeholders’ views on the opportunities and risks associated with the proposed trial. Stakeholder feedback will assist the AER’s consideration of whether or not to grant the waiver, and if so the duration and terms associated with a waiver.

The questions for stakeholders are linked to the waiver assessment criteria that the AER must have regard to. These include promotion of the NEO,⁶ potential cross-subsidisation and discrimination risks, and whether the benefit, or likely benefit, to electricity consumers of the DNSP complying with the obligation (including any benefit, or likely benefit, from increased competition) would be outweighed by the cost to the DNSP of complying with that obligation. Our decision-making framework considers whether, and what form of, market insufficiency (i.e. market failures) exists in the areas where Essential Energy propose to install the 300 chargers.⁷

This consultation relates specifically to Essential Energy’s proposed trial. We are cognisant of broader public policy discussion about the role of DNSPs in delivering public EV charging infrastructure. There are ongoing jurisdiction-level EV charging initiatives, such as the NSW Government EV Strategy⁸ and Victoria’s EV Charging Regulatory Statement,⁹ which sets the policy and investment landscape for the EV charging industry. Additionally, the Australian Energy Market Commission (AEMC) is considering several related rule change proposals, including:

- Energy Networks Australia’s (ENA’s) rule change proposal to allow kerbside EV chargers to be treated as a regulated distribution service;¹⁰
- the Commonwealth Department of Climate Change, Energy, the Environment and Water’s (DCCEEW) rule change proposal to enable its ‘Accelerating Electric Vehicle Charging Program’, which seeks to allow DNSPs to play a greater role in the delivery of public EV charging infrastructure on a last resort basis servicing uneconomic areas where competition is considered unlikely;¹¹ and

⁶ AEMC, [National Energy Objectives](#), 2025, accessed April 2025

⁷ Market failure refers to when there is an inefficient level of provision and access to goods or services in a market. Causes of market failure may include transaction costs, insufficient information, or other barriers which prevent the efficient level of goods and services to be exchanged.

⁸ NSW Climate and Energy Action, [NSW Electric Vehicle Strategy](#), 2026, accessed 22 May 2026

⁹ Victoria Department of Energy, [Environment and Climate Action, EV Charging Regulatory Statement](#), April 2026, accessed 22 May 2025.

¹⁰ AEMC, [Enabling distribution network service provider led electric vehicle charging](#), 2026, accessed 22 May 2026

¹¹ AEMC, [Facilitating EV charging infrastructure rollout under Commonwealth grants](#), 2026, accessed 22 May 2026

- NEXA Advisory’s rule change proposal for ring-fencing to be formalised in the National Electricity Rules (NER) to limit network businesses’ role to only providing contestable services where there is a demonstrated market failure.¹²

We will have regard to this broader policy context and are interested in whether data from this trial might inform those processes. However, this consultation is not intended to substitute for those broader policy and rule changes being considered. Our focus is directed to the narrower question on whether to grant a waiver to allow Essential Energy to undertake its proposed trial, given the considerations set out in the guideline.

The AER granted CitiPower, Powercor and United Energy (CPU) a ring-fencing waiver on 22 October 2025 for a trial of 100 kerbside EV chargers across its Victorian distribution areas.¹³ Under the trial, CPU owns and maintains the EV chargers, using its staff to maintain the equipment until the waiver expires on 30 June 2031. CPU plans to lease commercial access to multiple e-Mobility Service Providers (e-MSPs) for each charger. Those e-MSPs will manage customer interactions, including pricing and billing. CPU would act as the financially responsible market participant (FRMP) for each charger and pass through the retail electricity cost to the e-MSP without adding a margin.

Essential Energy’s proposed EV charging trial, which forms stream 2 of the broader ARENA-funded trial and is the subject of this waiver application, is like CPU’s trial in that Essential Energy would own, install and maintain the chargers and lease them to charge point operators. However, there are several key differences. The trial would be limited to regional NSW, with one charge point operator per charger. The charge point operator or retailer which activates the associated National Metering Identifier (NMI) for billing and settlement purposes would assume the FRMP role. The chargers would also be embedded within composite streetlight and electricity distribution poles, rather than mounted externally on timber poles.

2.2 How to make a submission

This consultation paper summarises the key elements of Essential Energy’s waiver application and the issues the AER considers most relevant to its assessment. However, we encourage stakeholders to refer to Essential Energy’s ring-fencing waiver application, which is published alongside this consultation paper on the AER’s website.

Interested parties are invited to make written submissions to the AER regarding this notice by the close of business **Tuesday 14 July 2026**. Submissions should be sent electronically to AERringfencing@aer.gov.au.

Alternatively, submissions can be mailed to:

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

¹² AEMC, [Enhancing competition in consumer energy resources and services in the NEM](#), 2026, accessed 22 May 2026

¹³ AER, [CitiPower, Powercor and United Energy – Ring-fencing waiver – Electric Vehicle Charging Infrastructure – Decision](#), October 2025

GPO Box 520
Melbourne VIC 3001

The AER prefers that all submissions be publicly available to facilitate an informed and transparent consultative process. Submissions will be treated as public documents unless otherwise requested. Parties wishing to submit confidential information are requested to:

- clearly identify the information that is the subject of the confidentiality claim; and
- provide a non-confidential version of the submission in a form suitable for publication.

All non-confidential submissions will be placed on the AER's website at www.aer.gov.au. For further information regarding the AER's use and disclosure of information provided to it, see the ACCC/AER Information Policy, June 2014 available on the AER's website.

Enquiries about this paper, or about lodging submissions, should be directed to the Consumers and Policy branch of the AER on 1300 585 165 or AERringfencing@er.gov.au.

Further information on the AER’s role in distribution ring-fencing is available on our website: <https://www.aer.gov.au/industry/networks/ring-fencing>.

2.3 Public stakeholder engagement workshop

The AER will conduct a stakeholder workshop during the consultation period. Essential Energy will outline its proposed trial to stakeholders, including detailing its approach and the benefits/risks of the trial. The AER will then facilitate a question and answer (Q&A) session, during which stakeholders can ask Essential Energy questions about the trial. The objective of the workshop is to ensure stakeholders have the chance to ask Essential Energy for the information that they require to provide the AER a well-informed submission.

Stakeholders can register for this workshop [here](#) and via the AER’s website.

2.4 Timeline

The proposed timeline for our assessment of Essential Energy’s ring-fencing waiver application is as follows. While we will endeavour to make decisions within the proposed timeframe, there may be complexities which require a longer period for us to fully consider the issues and arrive at a decision.

Milestone	Date
Consultation period	3 June – 14 July 2026
Stakeholder engagement workshop	Tuesday 23 June 2026
AER’s decision	August –September 2026

We note that Essential Energy’s application requested its waiver application be progressed through an ‘expedited process’. The guideline provides that the AER may, among other things, invite public submissions on an application and otherwise conduct such consultation as it considers appropriate. In this instance, we consider that the potential complexity of the

proposed trial and stakeholder interest in DNSP-led EV charging infrastructure warrants treating this waiver as complex and undertaking full stakeholder consultation.

3 Key consultation areas

3.1 National Electricity Objective

In its waiver application, Essential Energy outlines a range of benefits that it believes support the objectives of the NEO:

- The trial “tests whether shared DNSP-installed infrastructure – meaning infrastructure owned, installed and maintained by the DNSP but operated commercially by third parties – can reduce deployment barriers, support competitive entry, and improve regional access without establishing or endorsing any ongoing DNSP role.”¹⁴ This includes insights into “whether embedding chargers in existing streetlight and distribution poles can reduce total deployment and lifecycle costs compared with conventional externally mounted chargers”¹⁵
- The trial will “generate practical insights into EV adoption, infrastructure utilisation, and the conditions required for commercially viable market delivery in regional areas.”¹⁶
- The trial will test if its delivery model can “unlock market participation in locations where commercial deployment has not occurred”, and “inform future regulatory decisions, including whether the model should continue, change, or cease.”¹⁷

Central to Essential Energy’s trial is the two-stream design, which it states allows “a controlled comparison to assess whether infrastructure enablement alone is sufficient [i.e. by reducing barriers to connections], or whether targeted shared infrastructure is required to overcome coordination constraints in persistently thin markets”.¹⁸ Stream 1 tests a hypothesis around barriers to connection for third parties, i.e. testing whether, if a DNSP identifies and makes deployment-ready poles for third party providers, this enables a greater rollout of public EV chargers in those areas. In comparison, stream 2 (subject of this waiver) tests the co-ordination failure hypothesis, which suggests that DNSP installation and leasing of the charging infrastructure is needed in areas where there is insufficient market interest.

¹⁴ Essential Energy application, p.5

¹⁵ Essential Energy application, p.40

¹⁶ Essential Energy application, p.23

¹⁷ Essential Energy application, pp.16 and 28

¹⁸ Essential Energy application, p.17

Question 1: Essential Energy states its trial aims to test whether a DNSP-led kerbside EV charging infrastructure roll-out, leveraging its existing maintenance staff and composite pole assets, can benefit the EV charging market in regional NSW. What are your views on the proposed trial design, its stated objectives, and its alignment with the NEO (i.e. promoting the long-term interest of customers)? Please provide examples or evidence to support your view.

Question 2: What are your views on the practical insights and learnings that Essential Energy states can be gained – which include learnings on EV purchasing behaviours and adoption, infrastructure utilisation, and conditions required for commercially viable market delivery in regional areas. Do you agree these learnings are beneficial for the industry and customers? Why or why not?

Question 3: What are your views on Essential Energy’s statement that its two-stream trial (for which this waiver would enable ‘stream 2’) represents a “controlled comparison to assess whether infrastructure enablement alone is sufficient, or whether targeted shared infrastructure is required to overcome coordination constraints in persistently thin market”?

3.2 Potential for cross-subsidisation and discrimination

Essential Energy’s waiver application explains that the trial would be co-funded through a grant from ARENA, under the Driving the Nation program, and Essential Energy’s unregulated (shareholder) funds. It states that the trial will not result in costs being borne by regulated electricity customers, and that cost allocation will be consistent with the AER-approved cost allocation model (CAM).¹⁹ Costs for the trial will be recovered via EV charging infrastructure lease fees charged to charge point operators for using its EV charging infrastructure, which would be set to “fully recover costs, benchmarked against market rates, and reviewed annually”.²⁰

Access to sites or site bundles “will be offered to the market through a transparent procurement or tender process open to all eligible providers”, and “selection of charge point operators will be based on transparent and objective criteria, which may include capability, delivery approach, and alignment with trial objectives”.²¹

The application also states that the EV chargers would be installed as part of an existing asset replacement program, so that deployment is limited to locations where poles are being replaced at end-of-life. It states that this targeted set of deployment locations reduces the likelihood of overlap with commercially attractive sites and would be unlikely to displace existing or planned commercial investment.

¹⁹ Essential Energy application, p.6

²⁰ Essential Energy application, p.46

²¹ Essential Energy application, pp.30 and 31

Question 4: What are your views on the proposed cost-recovery method for the trial, which involves Essential Energy recovering its full costs, benchmarked against market rates, from the charge point operator that leases its EV charging infrastructure? Do you believe there are potential risks of cross-subsidisation under this model?

Question 5: Essential Energy states it intends to offer sites or ‘site bundles’ to eligible providers who would be assessed against a set of selection criteria (including capability, delivery approach, and alignment with trial objectives). What are your views on the proposed procurement / tendering process for making sites and ‘site bundles’ available to third-party charge point operators to operate the chargers? To what extent might there be potential discrimination or competition concerns associated with the proposed process, and how might these be addressed?

Question 6: What are your views on Essential Energy’s proposed method of selecting the composite poles for installing its EV chargers – that is, for the chargers to be sited in locations where composite poles are being replaced as part of its asset replacement program?

3.3 Likely benefits to consumers vs likely costs to Essential Energy from ring-fencing compliance

The guideline requires the AER to consider whether the benefit, or likely benefit, to electricity consumers of the DNSP complying with the obligation (including any benefit, or likely benefit, from increased competition) would be outweighed by the cost to the DNSP of complying with that obligation. Inherent within this aspect of the decision-making framework is consideration of the impact on competition from granting a waiver, and consideration of where there is a market failure justifying intervention.

Essential Energy states in its application that public EV charging infrastructure, particularly kerbside charging, remains underdeveloped in regional and remote areas of NSW. It states that there are only 20 active pole-mounted chargers in its distribution area, which are operated by EVX and Asset Charge, and have been installed through direct facilitation by Essential Energy (undertaking site identification, technical assessment, council and CPO engagement). Essential Energy states that there is “little to no evidence of purely commercial, non-facilitated pole-mounted charger installations in regional NSW”, referring also to fast chargers. It also points to the NSW Government’s EV Fast Charging Grants program, under which less than 30% of the initial budget in Round 3 was allocated, despite the program covering 80–90% of capital costs in regional and remote areas.²²

In its application, Essential Energy states that low utilisation, high enablement costs and operational challenges mean that commercial deployment has not occurred at scale. The application sets out a ‘market scan’ in support of this assessment.²³ Essential Energy states its trial aims to address this perceived market gap by enabling public EV charging infrastructure in locations where commercial investment has not emerged.

²² Essential Energy application, pp.42 and 49

²³ Essential Energy application, p.41

Taken together, these matters are relevant to whether there is a sufficiently demonstrated market gap or market failure in the locations targeted by the proposed trial. Also, whether the benefit, or likely benefit, to electricity consumers of Essential Energy complying with ring-fencing requirements (including any benefit from increased competition) would be outweighed by the cost to Essential Energy of complying with ring-fencing requirements.

Essential Energy proposes to mitigate the risk of the trial harming competition by:

- targeting unmet need according to a set of principles to guide its Plug and Play trial, including targeting unmet demand, not competing with the market, and competitive neutrality.²⁴
- not reserving or selecting sites for the trial where charge point operators have commercial plans (i.e. where the site is subject to a connection application).
- prioritising facilitation of third-party connections in locations where they have received a connection application.

Essential Energy’s application states that it would not lock charge point operators out of future ownership or operation of the assets after the trial. It states that “access [to the EV charging infrastructure embedded in the composite poles] must remain restricted to DNSP-accredited personnel for safety and system security. This is directly analogous to arrangements used for public streetlights, where councils procure the service, but Essential Energy maintains the asset”.²⁵

Question 7: What do you think the impact of Essential Energy’s trial on market competition might be, given its trial will be contained to remote NSW within its distribution area? Do you believe the mitigations that Essential Energy has proposed (i.e. targeting unmet need, not reserving sites with commercial plans, and prioritising facilitation of third-party connections) will avoid harm to competition?

Question 8: What are your views on Essential Energy’s contention that public EV charging in regional and remote areas is underdeveloped?

Question 9: What are your views on the proposed model, with third-party ownership and operation of DNSP-owned, embedded EV charging infrastructure assets? What are your views on the potential role of this business model in the EV charging market?

3.4 Duration and information sharing

ARENA’s estimated end date for the Plug and Play trial is 31 October 2028. However, Essential Energy is seeking a waiver until 30 June 2033. Essential Energy states that the longer period is necessary to:

- support full deployment of trial infrastructure (majority of installation by December 2027 but may extend to July 2028)

²⁴ Essential Energy application, p.28

²⁵ Essential Energy application, p.38

- enable a meaningful period of operation and data collection
- allow for reporting and knowledge-sharing in accordance with ARENA requirements.

The potential value of the trial is likely to depend in part on the usefulness of the information and data that it generates and shares publicly. Relevant information may include deployment progress; energisation timeframes; locations; technical performance and maintenance outcomes; charger utilisation and consumer usage patterns; participation by charge point operators; consumer access and service outcomes; cost and economic assessment information; and knowledge-sharing outputs that may inform future regulatory and policy processes.

We welcome stakeholder views on what data or information that the trial may generate would be useful and the AER should consider via waiver conditions, if the waiver is granted.

Question 10: What are your views on the proposed waiver duration of up to 30 June 2033 (approx. 7 years), which is beyond the ARENA funding agreement end date of July 2028? Essential Energy states this is to facilitate time for full infrastructure deployment, a meaningful period of operation and data collection, and reporting and knowledge-sharing of trial learnings.

Question 11: What are your views on the information, data and learnings that Essential Energy’s trial should generate and share to support broader industry development and inform future policy and regulatory decisions? If the waiver is granted, are there particular reporting requirements or waiver conditions the AER should impose—for example, on charger installation and deployment progress, site selection criteria, tender outcomes, and the format and frequency of commercial, technical and performance reporting?

4 Summary of questions

Question 1: Essential Energy states its trial aims to test whether a DNSP-led kerbside EV charging infrastructure roll-out, leveraging its existing maintenance staff and composite pole assets, can benefit the EV charging market in regional NSW. What are your views on the proposed trial design, its stated objectives, and its alignment with the NEO (i.e. promoting the long-term interest of customers)? Please provide examples or evidence to support your view.

Question 2: What are your views on the practical insights and learnings that Essential Energy states can be gained – which include learnings on EV purchasing behaviours and adoption, infrastructure utilisation, and conditions required for commercially viable market delivery in regional areas. Do you agree these learnings are beneficial for the industry and customers? Why or why not?

Question 3: What are your views on Essential Energy’s statement that its two-stream trial (for which this waiver would enable ‘stream 2’) represents a “controlled comparison to assess whether infrastructure enablement alone is sufficient, or whether targeted shared infrastructure is required to overcome coordination constraints in persistently thin market”?

Question 4: What are your views on the proposed cost-recovery method for the trial, which involves Essential Energy recovering its full costs, benchmarked against market rates, from the charge point operator that leases its EV charging infrastructure? Do you believe there are potential risks of cross-subsidisation under this model?

Question 5: Essential Energy states it intends to offer sites or ‘site bundles’ to eligible providers who would be assessed against a set of selection criteria (including capability, delivery approach, and alignment with trial objectives). What are your views on the proposed procurement / tendering process for making sites and ‘site bundles’ available to third-party charge point operators to operate the chargers? To what extent might there be potential discrimination or competition concerns associated with the proposed process, and how might these be addressed?

Question 6: What are your views on Essential Energy’s proposed method of selecting the composite poles for installing its EV chargers – that is, for the chargers to be sited in locations where composite poles are being replaced as part of its asset replacement program?

Question 7: What do you think the impact of Essential Energy’s trial on market competition might be, given its trial will be contained to remote NSW within its distribution area? Do you believe the mitigations that Essential Energy has proposed (i.e. targeting unmet need, not reserving sites with commercial plans, and prioritising facilitation of third-party connections) will avoid harm to competition?

Question 8: What are your views on Essential Energy’s contention that public EV charging in regional and remote areas is underdeveloped?

Question 9: What are your views on the proposed model, with third-party ownership and operation of DNSP-owned, embedded EV charging infrastructure assets? What are your views on the potential role of this business model in the EV charging market?

Question 10: What are your views on the proposed waiver duration of up to 30 June 2033 (approx. 7 years), which is beyond the ARENA funding agreement end date of July 2028?

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Question 11: What are your views on the information, data and learnings that Essential Energy’s trial should generate and share to support broader industry development and inform future policy and regulatory decisions? If the waiver is granted, are there particular reporting requirements or waiver conditions the AER should impose—for example, on charger installation and deployment progress, site selection criteria, tender outcomes, and the format and frequency of commercial, technical and performance reporting?