

14 July 2026

Ms Stephanie Jolly
Executive General Manager, Consumer, Policy and Markets Division
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

By online submission:

Dear Ms Jolly

AEMO submission on Essential Energy's Ring-Fencing Waiver Application – Pole Mounted EV Charging Infrastructure (AER reference: 31928805)

AEMO appreciates the opportunity to comment on Essential Energy's application for a ring-fencing waiver relating to the deployment of pole-mounted electric vehicle charging infrastructure.

AEMO's comments are limited to matters relating to the operation of the National Electricity Market (NEM), including the National Electricity Rules (NER), market processes, and metering arrangements.

AEMO observations

Following productive discussions with Essential Energy regarding the proposed deployment model, AEMO understands that:

- Essential Energy does not intend to participate in the appointment of contestable metering service parties. Appointment of the Metering Coordinator and other contestable market roles will remain the responsibility of the relevant Financially Responsible Market Participant (FRMP), consistent with the requirements of NER Chapter 7.
- The EV charging equipment will remain electrically isolated until the necessary market relationships have been established and the relevant connection, metering, and market processes have been completed. This approach is consistent with existing connection and commissioning arrangements and should ensure that electricity consumption is appropriately measured and accounted for in market settlement.
- Essential Energy intends to rely on the appointed Metering Coordinator and other accredited metering parties to determine and deploy the appropriate metering solution, including, where appropriate, emerging type 9 metering installation technologies as they become available.

Based on this understanding, AEMO has not identified any material concerns regarding the integrity of market settlement or the operation of existing NER Chapter 7 market processes arising from the proposed deployment model, at this time.

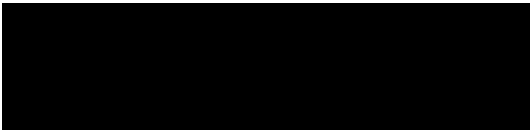
Implementation dependencies

AEMO notes that successful implementation of the proposed deployment is dependent upon the availability of suitable metering solutions capable of supporting the intended application. This includes the pattern approval of appropriate metering devices under the National Measurement framework and the availability of registered Metering Coordinators and other accredited metering parties able to deploy and maintain those solutions.

These matters are implementation dependencies rather than issues arising from the proposed market model itself and Essential Energy has recognised these as being outside the remit of a DNSP. The proposed implementation timeframes and the ongoing development of type 9 metering installation solutions provide the opportunity for the relevant industry participant to put in place the appropriate arrangements prior to deployment.

AEMO looks forward to working with the AER, Essential Energy, and other stakeholders as the consultation process progresses. Should you wish to discuss any of the matters raised in this submission, please contact Hannah Heath, Group Manager – Strategic Market Reform, at [REDACTED]

Yours sincerely,



Violette Mouchaileh
Executive General Manager, Policy and Corporate Affairs