Australian Electric Vehicle Association

ABN: 71 660 748 318
PO Box 6057
North Ryde NSW 2113

Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

Email: AERringfencing@aer.gov.au

16 July 2025

Submission to AER Consultation Paper: Ring-fencing waiver application for an EV charging infrastructure trial from Essential Energy, ARENA-funded, 'Plug and Play' trial.

The Australian Electric Vehicle Association (AEVA) is the national organisation representing Australian electric vehicle (EV) drivers and consumers, with over 2,500 members across all States and Territories. AEVA is a volunteer-run, independent not-for-profit organisation and is the oldest continuously running electric vehicle association in the world, having been formed in 1973 during the first gulf oil shock.

AEVA has no commercial interest in the proposed rule changes and the views expressed reflect what we believe are in the best interests of the Australian public. We are guided by our members based on our annual member survey results, and are consistent with our goal of electrifying transport in Australia as quickly as possible.

AEVA's policy official statement on public charging infrastructure can be found at this link: https://www.aeva.asn.au/files/4955/. On behalf of AEVA I make the following submission by responding to this June 2026 Consultation Paper.

AEVA's responses to consultation questions:

Questions 8 & 9:

AEVA is generally supportive of any program that increases charging infrastructure either in a commercially sustainable manner, or through direct subsidies and grants when the former is not possible. Stream 1 of this proposal supports this approach.

AEVA does not agree with the assertion that a lack of pole chargers in regional NSW represents a market failure, nor does AEVA consider the lack of infrastructure is a major factor in low electric vehicle (EV) uptake. Although it is frequently cited as a factor, particularly in surveys of non-EV owners, we are yet to see this assertion proven right. Low EV uptake in regional and remote areas was largely due to a limited selection of suitable vehicles (although this has changed recently) alongside a general misunderstanding of the technology and what has been effectively a media barrage of misinformation.

Our regular member surveys indicate that a large majority of members purchase EVs primarily for the cost savings. They charge without difficulty at home at least 80% of the time and report only occasional difficulty with regional charging, mainly related to DC fast charger reliability.

Finally, EV sales have firmly moved into the "early majority" phase of the technology uptake curve, where the market will continue to expand exponentially. Market demand alone should drive an efficient and sustainable rollout of charging infrastructure by charge point operators.

Questions 4 & 9:

Distribution network service provider (DNSP) - owned assets will only be attractive to charge point owners (CPO) if they are commercially viable. AEVA agrees (Q4) that DNSP full cost recovery should be from charger revenue *alone*, meaning that the model in stream 2 of Essential Energy's proposal will only be viable at relatively busy sites. DNSP assets are unlikely to be utilised in marginal sites, or sites where home charging is already far more convenient. The model of targeted shared infrastructure is therefore unlikely to increase charger availability through CPOs and runs the risk of DNSP later applying for a monopoly service in areas which could ultimately prove to be financially viable longer term.

Although Essential Energy's proposal funds the chargers in stream 2 entirely from ARENA and shareholders and their costs during the trial are funded entirely from charger revenue, it is silent on what happens when the trial ends. It remains critical that the chargers are not wound back into the regulated asset base and funded by the wider electricity customer base. Essential Energy must accept this risk as part of their proposal.

Questions 6 & 7:

The measures to mitigate the risk to competition are acceptable. However, when coupled with the specific conditions of sites where composite poles are installed as asset replacement, there will be relatively few sites suitable for charging. This presents a risk of underutilisation and the legacy problems mentioned in the previous response.

Question 10:

The trial length of seven years is far too long. Given that Essential Energy has asked that the trial commence as quickly as possible, much of the infrastructure should be in place by the time ARENA funding finishes in 2028. With the current exponential EV uptake rate there are likely to be a significant number of EVs in regional NSW by then, allowing meaningful data collection for at least another year or two.

[redacted]

Dr Chris Jones

Policy Advocacy Convenor

Australian Electric Vehicle Association

[redacted]

https://www.aer.gov.au/news/articles/communications/consultation-opens-essential-energys-ring-fencing-waiver-application-providing-kerbside-ev-charging-infrastructure