

14/07/2026

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

Dear Ms Jolly,

Ring-fencing waiver application for Kerbside EV charging infrastructure trial from Essential Energy - Consultation Paper

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Regulator's (AER) Consultation Paper on a ring-fencing waiver application for kerbside electric vehicle charging infrastructure (EVCI) trial from Essential Energy.¹

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA supports approval of the waiver for Essential Energy's kerbside EVCI trial, which is specifically designed to fill gaps in charging infrastructure in regional NSW and allow the Distribution Network Service Provider (DNSP) to deliver EVCI in locations where commercial development may not otherwise occur. DNSPs are key infrastructure providers who can work alongside industry to roll out kerbside chargers at pace, and this trial will provide valuable learnings on effective coordination. Supporting the uptake of electric vehicles (EVs) is an important component of Australia's decarbonisation journey, and this includes taking steps to ensure the choice to adopt EVs is available to all households.

Owning an EV lowers household energy costs and contribute to emissions reduction. Modelling in *The Time is Now* report demonstrates that customers with an EV can save up to \$2,500 per year.² Increasing the availability of kerbside chargers across Essential Energy's jurisdiction can encourage more NSW customers to invest in EV's, lowering both long-term costs for consumers and transport-related emissions.

Accelerating EVCI adoption across Australia relies on a diversity of charging infrastructure to suit the diverse needs and expectations of consumers. Kerbside charging is an emerging service offering. Trials, like this one focussed on streetlights and existing distribution poles, are essential to understanding how to embed EVCI into every day life and whether its availability provides a more equitable access to the benefits of EV ownership by supporting EV adoption for a broader cohort of customers.

Essential Energy's network area covers the majority of NSW and is one of Australia's largest electricity distribution networks. Yet less than 50 pole-mounted chargers currently exist across the entire network, significantly impeding regional NSW residents from feeling empowered to purchase an

¹ Australian Energy Regulator, *Essential Energy - Ring-fencing waiver - Kerbside EV charging infrastructure*, 3 June 2026

² Energy Networks Australia and L.E.K Consulting, *The Time is Now*, August 2024

EV. A key advantage to this trial is utilising Essential Energy's scope in operating locations to diversify and efficiently deliver EVCI across regional NSW.

Kerbside charging added to the mix

Access to charging infrastructure is a barrier for 32% of potential EV buyers.³ Kerbside EVCI is one type of charging to support availability, encouraging EV adoption for those without off-street parking. Essential Energy's proposed trial expands the ability to adopt EVs across a broader range of demographics, including those who live in apartments, homes without capability for home charging, or renters who change residences more frequently and will rely on broader charging locational availability.

This trial has a focus on providing EVCI to visitors and tourists to regional NSW. Range anxiety, the second highest concern for potential EV buyers,⁴ refers to the concern of the availability of charging sites when travelling outside of local areas. A focus on regional kerbside EVCI reduces range anxiety for all EV users, easing concerns surrounding EV adoption. Greater availability of charging of all types facilitates greater confidence for EV owners in long-range travel, empowering individual choices and boosting regional tourism.

Ensuring competition in EVCI

As the AER notes in the consultation paper, the trial must not prevent market competition. ENA agrees competition is an essential part of the energy regulatory framework and should occur where this benefits customers, including in the newly developing EV charging service market.

Essential Energy's proposal is not seeking to weaken competition or attempt to gain market share. The intention of the trial is to provide insights on how to best rectify the current gap in availability of charging in regional NSW, rebalancing the development of broader EVCI between metropolitan and regional locations.

The introduction of kerbside EVCI does not eliminate competition from other forms of EVCI, nor does it intend to. Kerbside charging is vital for users without off-street parking or other means to charge safely at home, eases range anxiety (especially for regional motorists travelling longer distances to access work and services), and provides greater confidence for all users to find available charging.

Essential Energy's proposed trial includes readying approximately 1000 poles for third-party owned kerbside chargers, supported by streamlined connection processes and reduced site barriers. A much smaller proportion of approximately 300 kerbside chargers are proposed to be DNSP owned and operated, targeted to areas where the market has not delivered outcomes. Those DNSP owned and operated chargers will still use a private sector charge point operator to deliver all retail services, removing any direct DNSP contact with customers and further supporting competition in the EV charging service market.

ARENA is contributing funding towards the delivery of kerbside EVCI. This funding may not cover the entirety of the delivery of the 300 kerbside chargers, and these additional costs will be recovered from shareholder funding, with no revenue generated from customers regulated charges. EVCI deployment under the proposal will have no impact on customers' regulated charges, with no risk being held by network users. ENA considers the proposed funding, cost allocation and audit arrangements appropriately address the risk of cross-subsidisation and ensure that trial costs are not recovered from regulated customers.

³ Consumer Policy Research Centre, *The barriers and potential enablers of electric vehicle uptake in Australia*, November 2022

⁴ Ibid

Trial requirements

Any waiver conditions should be proportionate to the scope and risks of this trial, recognise the safeguards already proposed by Essential Energy and avoid duplicating existing ARENA reporting and assurance requirements. ENA considers the cost recovery for assets within this trial should be treated the same as any other trial asset.

Essential Energy's trial does not permit direct participation in retail EV charging services and does not contribute to increases in regulated charges to customers. The trial's cost recovery is proposed through annually reviewed and market benchmarked charges to charge point operators, ensuring costs do not forestall the industry's development.

ENA is supportive of publication of trial learnings as is consistent with previous approved waivers. For learnings to be useful to other parties, including for the consideration of enduring arrangements for service classification, the trial must go for a sufficient duration to monitor the changes in consumer behaviour, including any changes to trends in EV uptake. In particular, whether upticks in adoption are sustained, which may take longer in regional and rural areas of NSW where EV uptake has been slower.. Therefore, ENA is supportive of the waiver extending to 2033 and longer than the ARENA funding.

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Senior Regulatory Analyst, on [REDACTED]

Yours sincerely,

[REDACTED]

Russell Pendlebury
General Manager, Regulation and Policy