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14 July 2026

Australian Energy Regulator

By email

To the Australian Energy Regulator,

**Essential Energy Plug and Play Electric Vehicle Charging Infrastructure funding trial –
Ring-fencing waiver application**

As one of Australia's largest mutuals, representing more than 3.6 million members, the NRMA is committed to working with government, industry and community to ensure transport policy settings are equitable, effective and future-focused.

The NRMA has been a strong advocate for the transition to electric transport, with a long-standing focus on expanding public charging access, supporting EV uptake, and ensuring motorists can participate in the transition across metropolitan, regional, and remote Australia.

The NRMA welcomes the opportunity to provide a submission on Essential Energy's ring-fencing waiver application to support ARENA's Plug and Play Electric Vehicle Charging Infrastructure funding trial.

The NRMA has invested significantly in public EV charging infrastructure (EVCI) and has practical experience as a charge point operator (CPO), including the delivery, operation and maintenance of EVCI in metropolitan, regional, and remote locations. This experience provides a practical perspective on both the opportunities and challenges associated with accelerating the rollout of EVCI.

The NRMA acknowledges that Essential Energy is seeking to address genuine barriers to EV charging deployment in regional and underserved locations, including challenges associated with site identification, connection processes, infrastructure availability, and the commercial viability of charging infrastructure where utilisation is low. These are legitimate policy challenges that warrant consideration.

However, the NRMA considers that reform should focus on removing barriers to investment, improving market efficiency, preserving competition, and delivering better outcomes for motorists. Reform should not allow monopoly network businesses to enter competitive charging markets where CPO-led delivery can meet the same public policy objectives.

The NRMA also supports a broader review of Australian electricity market settings to ensure they are fit-for-purpose for EV charging, including tariffs, connection processes, network access arrangements, and the role of distribution network service providers (DNSPs).

This submission reflects the NRMA's broader policy position on EVCI and the role of DNSPs. The attached document forms part of this submission and sets out the NRMA's preferred long-term framework for EVCI deployment, electricity market reform, and the appropriate role of DNSPs.

Preserving competition and consumer outcomes

Public EV charging is a competitive retail service.

Reliable, affordable and convenient access to public EV charging is essential to Australia's transport transition.

For decades, Australian electricity market reforms have separated monopoly network businesses from competitive retail services. This separation has supported competition, encouraged investment, promoted innovation, and delivered positive outcomes for consumers. In the NRMA's view, these principles remain relevant as the EV charging market develops.

While DNSPs have an important role to play in supporting EVCI, that role should be focused on enabling investment through connection services, network capacity information, and efficient access arrangements.

The NRMA does not support DNSP ownership or operation of EVCI.

Allowing monopoly network businesses to move beyond an enabling role and into ownership, installation or operation of EVCI risks undermining existing investment, discouraging future participation by CPOs, and transferring costs to electricity consumers that may otherwise be borne through competitive markets. This is particularly important where competitive delivery can meet the same public policy objectives without shifting avoidable costs to all electricity consumers.

Where private CPOs are willing and able to deliver EVCI, regulatory settings should preserve competitive neutrality and avoid providing regulated monopoly businesses with advantages that are not available to other market participants. Competitive markets remain the most effective mechanism for encouraging investment, innovation, service quality, and consumer choice.

Different charging markets require different policy settings

AC charging, up to 22kW, is primarily a local access and kerbside charging service. It is intended to support motorists who do not have convenient access to home charging and may benefit from targeted interventions that address genuine access gaps. For some apartment residents and strata communities, building-level charging may be more efficient than relying on public kerbside charging, reinforcing the need to match charging solutions with motorists' circumstances.

DC fast charging, 50kW and above, performs a different function. It supports journey enablement, regional connectivity and long-distance travel. Significant investment has already occurred in this market through a combination of private capital and government co-funding programs.

Accordingly, AC charging and DC fast charging should be addressed through different policy frameworks.

CPOs are directly incentivised to maximise charger availability, utilisation, reliability and service quality because their returns depend on attracting and retaining customers. These incentives support better outcomes for motorists and are an important reason why ownership and operation of public EVCI should remain contestable and CPO-led.

Position on Essential Energy proposal

A market-led approach to EVCI best preserves competition, supports investment, and delivers better outcomes for motorists.

DNSPs can play an important role in supporting the rollout of EVCI. However, that role should be focused on enabling investment rather than installing, owning, operating or maintaining EVCI.

DNSPs are well placed to assist in identifying suitable locations, providing transparent network capacity information, undertaking connection-related works, improving access arrangements, and helping remove barriers to deployment. These functions can improve market efficiency and accelerate investment while preserving competition and consumer choice.

The NRMA supports Essential Energy's proposed Stream 1 approach. It provides an opportunity to test whether improved site identification, network information, and connection enablement can unlock greater private investment in regional EVCI without expanding the DNSP role beyond its traditional enabling functions.

The preferred model is one where CPOs retain responsibility for installing, owning, operating and maintaining EVCI, while DNSPs perform clearly defined enabling functions that support efficient deployment.

The NRMA does not support arrangements that enable DNSPs to become owners or operators of EVCI, including through installation, ownership or maintenance that would otherwise be delivered through competitive markets. For this reason, the NRMA does not support Essential Energy's proposed Stream 2 approach in its current form. Stream 2 would permit Essential Energy to install, own and maintain public EVCI within distribution assets while providing third-party access to CPOs to deliver customer-facing charging services.

While Essential Energy would not participate in retail charging activities, the proposal would still give a monopoly network business responsibility for critical elements of the charging infrastructure supply chain.

Where additional regional or remote charging coverage is required, priority should be given to removing market barriers and enabling competitive delivery before alternative ownership models are considered. Public support, where necessary, should be allocated through competitive processes that preserve competition, maintain CPO-led delivery, and avoid creating enduring monopoly ownership arrangements in competitive charging markets.

Reform priorities

Priority should be given to addressing the barriers that currently impede investment and charging deployment, including:

- Faster and more predictable connection processes.
- Greater transparency of network capacity information.
- Fit-for-purpose electricity tariffs that reflect the operational realities of public EVCI.
- Standardised and transparent access charges and connection arrangements.
- Competitive allocation of government support where intervention is required.
- Consumer protections relating to reliability, accessibility, transparency and open access.

Electricity tariff reform is particularly important. Existing tariff structures were not designed for public EV charging services and can make it difficult for CPOs to operate and invest efficiently. A modernised tariff framework should recognise the operational realities of public charging, support efficient network utilisation, and provide greater investment certainty.

Similarly, improved connection processes and transparent network capacity information would assist all market participants. DNSPs are well placed to support these reforms because they control the network information and connection processes that can currently delay deployment.



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Conclusion

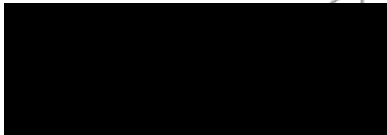
The NRMA supports electricity market reform that accelerates EV charging deployment, improves outcomes for motorists, and preserves competition.

Genuine market barriers must be addressed. However, reform should focus on improving market settings rather than allowing monopoly network businesses to enter competitive charging markets.

The preferred policy approach is clear. DNSPs should support the rollout of EVCI by improving connection processes, publishing network capacity information, supporting site readiness, and enabling efficient access arrangements. CPOs should continue to install, own, operate and maintain public EVCI in a competitive market.

The attached document provides further detail on the NRMA's preferred long-term framework for EVCI and the role of DNSPs.

Yours faithfully,



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Public policy position

Electricity distributor involvement in electric vehicle
charging infrastructure in Australia

Principles for EV charging market reform.

Electric vehicle charging is emerging as a significant electricity service, but many market settings were developed before public charging existed and are not yet fit for purpose.

- Australian electricity market settings were designed for a centralised electricity system long before public EV charging emerged. The NRMA supports a comprehensive review to ensure these settings are fit-for-purpose for EV charging.
- For decades, Australian energy market reforms have separated monopoly network businesses from competitive retail electricity services to promote competition, investment and consumer outcomes.
- Public EV charging is a competitive retail service and should remain competitive.
- Long-standing regulatory separation between monopoly network businesses and competitive retail services has supported competition, investment and consumer outcomes, and should be preserved.
- Regulatory reform should focus on removing barriers to investment, improving market efficiency and establishing clear rules of engagement for EV charging services, rather than allowing monopoly participation in competitive markets.

Why reform is needed

- Connection timeframes can exceed 18–24 months.
- Existing tariff structures were not designed for public EV charging.
- Access to network capacity information remains inconsistent.
- These barriers discourage investment, delay charging deployment, and reduce competition.

The NRMA's experience

- The NRMA has practical experience as a charge point operator (CPO), with a deep understanding of the barriers affecting public charging investment.
- The NRMA supports competition, consumer protections, and appropriate regulation of EV charging services.
- The NRMA has invested significantly in public charging infrastructure under the existing regulatory framework.
- Future reforms should support investment certainty, consumer confidence and fair competition.

The Australian electricity market should be modernised to support EV charging. Reform should focus on removing barriers to investment, improving market efficiency, preserving competition, and delivering better outcomes for motorists.

The NRMA's policy position on a page.

The NRMA supports a competitive, market-led approach to electric vehicle charging infrastructure (EVCI) that puts motorists first, with charge point operators (CPOs) leading the rollout. AC charging (up to 22kW) is primarily a local access and kerbside charging service, while DC fast charging (50kW+) is a competitive retail service supporting journey enablement and long-distance travel. The NRMA recognises that these different use cases require different policy settings. The NRMA does not support DNSP ownership or operation of EVCI, which should remain a competitive, market-led service. Long-standing regulatory separation between monopoly network businesses and competitive retail services should be preserved. Targeted reforms, including faster connections, transparent capacity data, fit-for-purpose tariffs, standardised access charges, competitive subsidies and user protections, can help remove the barriers to investment.

AC charging (up to 22kW)

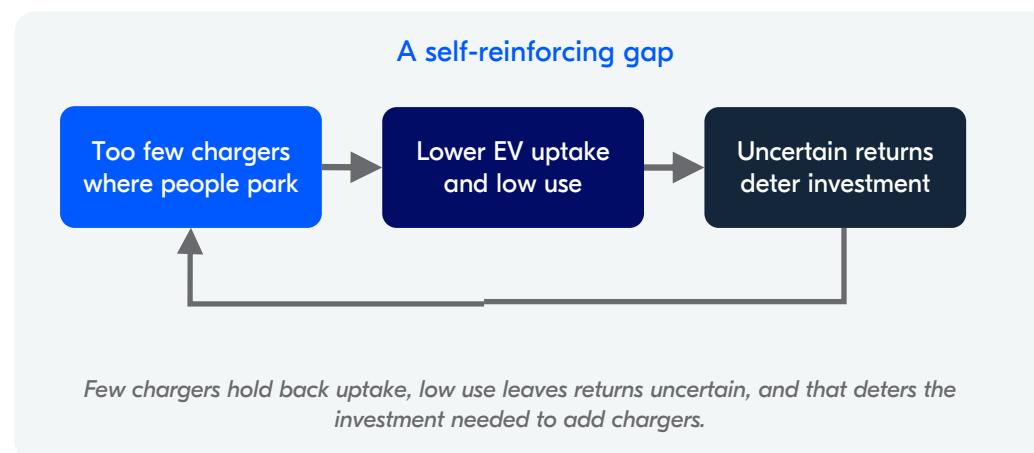
- Market-led, with a defined enabling role for distributors.
- Distributors fund and ready packages of charge-point sites, removing the upfront cost and current connection challenges.
- CPOs bid competitively to install, own, operate and maintain each package of charge-point sites.
- The winning bid sets the price, or the minimum subsidy a non-commercial site needs. The difference between costs to make sites available and the winning bid is recovered from all energy consumers.
- Operation of AC charging points stays contestable, with public support targeted only to the sites that need it.
- Operator returns are linked to usage which provides an incentive to maximise charger up-time in the interests of the motorist.

DC fast charging (50kW+)

- DC fast charging should remain a competitive, market-led service delivered by CPOs.
- Existing public charging networks have been built through private investment and government co-funding programs. These investments should be respected through future regulatory change.
- The NRMA does not support DNSP ownership or operation of DC fast charging infrastructure. Public EV charging is a competitive retail service and should remain contestable.
- Long-standing regulatory separation between monopoly network businesses and competitive retail services should be preserved to protect competition, investment certainty and consumer confidence.
- Targeted reforms (faster connections, transparent capacity data, fit-for-purpose tariffs, standardised access charges, competitive subsidies and user protections) can help to remove the barriers.

Motorists without convenient access to charging face different barriers requiring different solutions.

- EV uptake is accelerating, but most charging still happens at home.
- Different cohorts face different charging barriers: apartment residents may be served through building retrofits and strata solutions, while households without parking may require kerbside or public charging.
- EVCI investment across AC and DC charging networks has been supported by federal government grants.
- To date, government support has been limited to the capital costs of building EVCI. In uneconomic locations where utilisation is low, charging revenue falls short of covering ongoing operating costs — leaving a funding gap that capital grants alone cannot close.
- Future policy responses may need to consider targeted capital and operating support for regional and remote locations where public benefit exceeds commercial returns.



Charging categories

AC charging (up to 22kW)

Primarily kerbside, destination and longer-dwell charging.

DC fast charging (50kW+)

Primarily public fast charging, highway charging and regional journey enablement.

Emerging apartment charging solutions

- Government-backed projects demonstrate that apartment charging barriers can be addressed through retrofits, load management and strata reform.
- A recent Melbourne apartment project installed 241 EV charge points using existing building infrastructure.
- Apartment charging should be considered alongside kerbside charging as part of a broader access strategy.

The NRMA supports a market-led rollout of AC charging (up to 22kW) in line with the needs of the motorist.

Distributors fund and prepare packages of sites, then the planner runs a competitive process in which CPOs bid to build and operate each package of sites for a given period.

How it works

1

Distributor funds and readies packages of charge point ready sites

The distributor completes connection and enablement works for bundled packages of sites that have been identified with an EV charging infrastructure planner, removing the upfront cost and current connection challenges.

2

CPOs bid competitively

The planner runs an open commercial process in which CPOs compete for the right to operate each package.

3

The bid sets price or subsidy

For commercial packages, the bid is the price the CPO pays; for non-commercial packages, it is the minimum subsidy the CPO requires (funded by the distributor).

Why it works

- Addresses the investment speed challenge, since the distributor carries the investment needed to prepare connections to charging sites.
- Maintains rollout speed by removing the connection and current enablement challenge.
- Creates strong cost-efficiency incentives, because competition reveals the efficient price or subsidy.
- Targets public support only to the sites that demonstrably require it.
- Supports future tariff reform by preserving competitive charging markets and maintaining clear separation between network and retail functions.

Key features of the rollout

- Planning should be guided by governments or an independent planner. Distributors should not determine national charging infrastructure needs.
- This model confines the distributor to funding and site readiness while CPOs build and own the chargers — avoids foreclosing on existing charging point networks.
- This model lets competitive bids to set the price or subsidy, instead of socialising uneconomic sites across all electricity consumers.
- Uses competition to reveal the minimum subsidy a non-commercial package requires.
- Any cost recovery should be tightly targeted, transparent and linked to clearly defined site need, rather than broad or open-ended recovery across consumers.

Operation stays contestable.

The competitive bid, not a regulated return, sets what consumers pay, so the distributor's role is limited to funding and enablement.

DC fast charging should remain a competitive market.

DC fast charging is a competitive retail service. Long-standing regulatory separation between monopoly network businesses and competitive retail services should be preserved.



Competition before intervention

DC fast charging (50kW+) should remain a competitive, market-led service delivered by CPOs.

Existing electricity market settings have long separated monopoly network businesses from competitive retail services to protect competition, encourage investment, support innovation, and deliver better outcomes for consumers.

The NRMA does not support DNSP ownership or operation of EV charging infrastructure.



Build on what works

Australia already has more than 1,200 fast charging sites built through a combination of private investment and government co-funding programs.

Existing investment should be respected, and future policy settings should build on, rather than undermine, this foundation.

Where additional coverage is required in regional and remote communities, governments should utilise targeted grants, competitive procurement and, where necessary, limited operating support to preserve CPO-led delivery.



Remove the barriers

Faster deployment of DC fast charging requires enabling reforms and cooperation, not a new ownership model.

Targeted reforms should focus on:

- Faster connections.
- Transparent capacity data.
- Fit-for-purpose electricity tariffs.
- Standardised access charges.
- Competitive subsidies.

These reforms will accelerate investment, improve charger availability and reliability, and deliver better outcomes for motorists while preserving competitive markets.

Targeted reforms can deliver a more efficient rollout while preserving competitive markets.

- 1 Faster connections**
Connection timeframes of 18–24 months are a large barrier to CPO investment; the NRMA supports reforms to speed approvals and standardise processes.
- 2 Transparent network capacity data**
Distributors should publish capacity and site-suitability data equally to all CPOs, on consistent terms that avoid informational or access advantages for particular market participants.
- 3 Fit-for-purpose electricity tariffs**
EVCI tariffs should reflect the operational realities of charging infrastructure and support efficient utilisation of the electricity network. Current tariff structures were not designed for public charging services and can discourage investment.
- 4 Standardised access charges**
Clear and consistent access charges for pole and network connections give CPOs the certainty needed to invest.
- 5 Competitive allocation of public subsidy**
Where government support is required, it should flow through competitive CPO processes such as site-package tenders, rather than regulated distributor returns.
- 6 User-protection standards**
Mandatory reliability, open access, accessibility and transparent pricing should apply to any publicly supported charging infrastructure.

These reforms address the most significant barriers to EVCI rollout while preserving competition, supporting investment, and improving outcomes for motorists.

Comparison of EV charging rule change proposals.

Feature	Energy Networks Australia (ENA) rule change request	Department of Climate Change, Energy, the Environment and Water (DCCEEW) rule change request	NRMA policy position
Role of distributors	Install, own and maintain EVCI and provide open access to third party CPOs to sell charging services to EV owners.	Identify suitable poles or regional blackspots with DCCEEW, complete connection works, and potentially install and maintain EVCI following a lack of commercial interest.	Identify suitable poles or regional blackspots with planner, complete connection works, publish network capacity transparently, and support faster connections.
Role of CPOs	Access distributor-owned EVCI and compete with other operators to sell electricity to EV owners.	Install the EVCI at ready-to-go kerbside sites and sell electricity to EV owners.	Install the EVCI at ready-to-go sites and sell electricity to EV owners.
Cost recovery	Recovered through electricity bills of all consumers in the form of guaranteed revenue.	Distributor costs are funded 70 per cent through electricity bills and 30 per cent through government grants. Where a site is economically viable, CPOs pay a connection fee and meet the infrastructure cost themselves.	Distributor costs of site preparation and subsidies would be recovered through electricity bills only where justified by clearly defined site need and bounded, transparent settings. CPOs would pay a connection fee and recover costs through charger usage.
Scope of charging	Framed as kerbside reform but drawn broadly, so it could extend to faster AC and DC charging. Size of the potential investment is not defined.	Clear distinction between AC slow charging in metro areas and DC fast charging for journey enablement or regional blackspots. Size of the investment is capped and decided by DCCEEW.	AC charging (up to 22kW) and DC fast charging (50kW+) should be addressed through separate policy frameworks. Public EV charging should remain a competitive, market-led service, with CPOs retaining responsibility for installing, owning, operating and maintaining EVCI. Where additional regional or remote coverage is required, governments should utilise grants and competitive procurement mechanisms.
Reliability risk	Distributor-owned sites face limited incentives to maintain high up-time of chargers.	Only commercially owned sites have a greater incentive to maintain high up-times.	All operators have an incentive to maximise up-time to be competitive and maximise returns.