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Introduction

Wagners Composite Fibre Technologies (Wagners CFT) welcomes the opportunity to provide feedback on Essential Energy's application for a ring-fencing waiver to support delivery of the Plug and Play kerbside electric vehicle charging trial in regional, rural and remote New South Wales. Wagners CFT is a project partner in the trial and supplier of the innovative composite streetlight columns that form part of the charging solution proposed under Stream 2 of the project.

Through our involvement in the project, previous trials, and operations in regional Australia, Wagners CFT has developed an understanding of both the challenges associated with deploying EV charging infrastructure in regional Australia and the innovative nature of the proposed solution. We strongly support the waiver application and believe it will generate valuable insights into how EV charging infrastructure can be delivered efficiently and safely in areas where commercial deployment has been limited.

Support for the Proposed Waiver

Wagners CFT support the proposed ring-fencing waiver because it addresses a demonstrable market gap in regional and rural NSW. Essential Energy's application identifies that kerbside EV charging infrastructure remains significantly underdeveloped across its network area, contributing to a thin market where infrastructure and EV adoption are mutually constrained. The proposed waiver will enable a targeted trial that can help determine whether innovative infrastructure delivery models can overcome these barriers and encourage greater market participation over time.

The Proposal Supports Market Development Rather Than Market Competition

Under the proposed arrangement, Essential Energy will install, own and maintain the charging infrastructure, while private sector charge point operators will continue to provide all customer-facing services including pricing, billing and customer management. Essential Energy will not participate in the retail EV charging market. The objective is to reduce infrastructure barriers that currently prevent market participation in many regional locations and create opportunities for third-party operators.

Innovation Benefits

The Plug and Play trial introduces a novel charging solution that integrates EV charging technology directly into composite streetlight columns. This reduces the need for additional street furniture, minimises construction requirements, and has the potential to lower deployment costs. The composite column creates a versatile platform that can support multiple uses beyond just streetlighting. As the supplier of the composite streetlight columns, Wagners views this initiative as an opportunity to demonstrate how Australian innovation and advanced manufacturing can support the energy transition and solve practical infrastructure challenges.

Benefits for Regional Communities

Kerbside charging can provide important charging opportunities for residents without convenient access to off-street charging infrastructure, support visitors and tourists travelling through regional towns, and encourage longer dwell times in local business districts. The project also delivers these benefits without requiring upfront capital investment from local councils, reducing financial and delivery risks for regional communities.

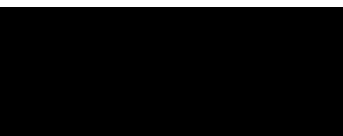
Why DNSP Participation is Appropriate

Essential Energy is uniquely positioned to undertake this trial through its existing infrastructure, workforce, operational capabilities, and extensive regional presence. The proposal leverages existing assets and maintenance programs to reduce deployment costs and barriers to future market participation.

Conclusion

Wagners Composite Fibre Technologies strongly supports Essential Energy's application for a ring-fencing waiver for the Plug and Play EV charging trial. The waiver will enable a time-limited and carefully defined trial that addresses a clear market gap in regional NSW, supports innovation in EV charging infrastructure, promotes future market participation, and delivers benefits to regional communities. We encourage the Australian Energy Regulator to approve the waiver application and enable the trial to proceed.

Yours faithfully,



James Lorrimer | Global Utility Lead | Wagners CFT

