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About Wevolt and our interest in this review

Wevolt is an Australian-owned software company for EV charging and site energy management, and an unaffiliated service provider in the terms of the Call for Input. We own no charging networks, no network assets, and we do not retail energy.

Our platform is standards-based, using OCPP (up to 2.0.1) between chargers and the management system and OCPI for roaming and interoperability. It is hardware-agnostic, managing charging hardware from more than 30 manufacturers across approximately 800 plugs. Deployments include public-transport charging in Western Australia (Transperth park-and-ride sites) and an international deployment delivered with UNDP in Samoa. The same orchestration layer is available to private charge point operators, fleet and site owners, and to networks and their partners, which is the perspective our answers are written from.

Question 1

Have we accurately described the key changes occurring in distribution networks and the broader energy system? Are there any important developments or trends we have not captured?

Yes, in our view the Call for Input describes the key changes accurately, in particular the observation (p.11) that new business models and technologies such as EV charging infrastructure are making it harder to distinguish regulated monopoly functions from activities more appropriately delivered by, or in conjunction with, parties unaffiliated with the DNSP.

One development we would add, because it changes what follows from that observation: the contestable software and services layer for EV charging has matured to the point where a genuine build-or-procure choice now exists for networks. Charge point management, load management, driver-facing services and roaming are available today from multiple Australian providers, on open international standards (OCPP for charger-to-platform communication, OCPI for roaming and interoperability), across mixed-vendor hardware. A DNSP that needs charging or flexibility capability no longer needs to build and own the customer-facing service stack to obtain it. Much of the discussion the review has received treats DNSP participation in contestable markets as a binary (participate or be excluded); the maturity of the procurable layer means there is a third mode, arm's-length competitive procurement, whose competition-risk profile is materially different. We expand on this under Questions 2 and 4.

A second, related trend: the consumer energy resources compliance architecture (CSIP-Aus) is now being rolled out for solar and battery exports across several jurisdictions, with flexible EV load widely expected as a

following wave. The boundary this review concerns will therefore carry more traffic, not less, over the life of the revised Guideline.

Question 2

Have we accurately reflected the concerns raised by stakeholders regarding the guidelines? Are there additional issues that should be considered as part of this review?

The concerns summarised are consistent with our experience as an unaffiliated provider. We corroborate, briefly, three points already on the record from the July workshop with contestable service providers: functional separation is an existential issue for investment in public EV charging; the waiver framework currently lacks effective tests for market failure, consumer benefit and long-term competition impacts; and reporting on waiver compliance and staff-sharing is too thin to give the market confidence.

One issue is missing from the concerns as summarised, and we ask that it be considered in this review: **the framework does not currently distinguish between the modes of DNSP participation in contestable activities, even though their competition risks differ sharply.** A DNSP that self-supplies the contestable elements of an activity (the management software, customer-facing services and operations), whether in-house or through an affiliate, creates exactly the risks ring-fencing exists to manage: an affiliated business to favour, regulated revenue to cross-subsidise from, and monopoly information to exploit. A DNSP that procures those same elements competitively from unaffiliated providers at arm's length creates far smaller risks, because there is no affiliated service business to advantage. The current waiver decision-making framework does not, so far as we can see, weigh this distinction. It should: recognising procurement as the lower-risk mode would give networks a clear, faster path through the waiver process while preserving the contestable market, and it responds to both stakeholder camps quoted in the Call for Input (those concerned about competitive distortion, and those concerned that ring-fencing prevents networks acting where private investment is absent) without requiring the review to take a side on service classification.

A second missing issue: interoperability of assets deployed under waivers. None of the stakeholder concerns summarised address whether waiver-enabled charging assets remain open to the competitive market over their life. We raise this under Question 4 as a scope item.

Question 3

Are there relevant experiences, case studies, examples or evidence that would help illustrate these issues or inform this review?

We offer evidence on one question that matters to this review: whether competitive procurement of the contestable layer is practicable for networks, or merely theoretical. It is practicable, and Wevolt's operating record is direct evidence.

Our platform currently manages charging hardware from more than 30 manufacturers through the OCPP open standard, and interoperates with other networks and service providers through OCPI. That record is itself the evidence: a single management layer running a mixed-vendor estate on an open protocol demonstrates that the service layer (management software, load management, driver applications, roaming) is substitutable and separable in practice, not just in principle, from the underlying hardware and from the party that owns the site or the asset.

Two illustrations of how that separation works commercially. In the Transperth park-and-ride deployment in Western Australia, the asset owner contracted for charger maintenance and operations, and its contractor in turn selected the charge point management platform. The asset owner obtained a managed charging service without building or owning software capability, and the software layer was chosen on its merits by the party delivering the service. An international deployment delivered with UNDP in Samoa follows a comparable pattern. In neither case is the buyer locked to a hardware vendor, and in neither case did obtaining the capability require building it.

The relevance to this review is narrow and we state it carefully: these examples show the contestable layer is separable and can be competitively selected within a delivery chain. They are not examples of a network procuring the layer directly, and we do not present them as such. The point they support is the one in Question 2: a party that needs charging capability has a real alternative to self-supplying the contestable elements.

The corollary for waiver design: because the layer is standards-based, conditions requiring open protocols (OCPP between charger and management system, OCPI for third-party roaming and eMSP access) cost a compliant deployment nothing, while preventing waiver-enabled assets from becoming closed to the market they were licensed into. We are happy to provide the AER with technical detail on what such conditions involve in practice.

We note the workshop summary records allegations by other providers of discriminatory treatment in connection timeframes and access to network assets during DNSP-led trials. We do not add a case study on that point in this submission.

Question 4

Do you consider the scope of this review to be appropriate? Are there additional areas of focus that you believe should be included?

The scope is appropriate, and we specifically support two of its choices: excluding service classification (which belongs with the Framework and Approach processes and the AEMC's ENRR, as the Call for Input states at p.17), and including the waiver decision-making framework and shared-asset benefit-sharing settings. Whatever the classification questions resolve to, networks and contestable providers will interact at a boundary, and it is the practical behaviour of that boundary that determines whether the market beyond it stays contestable in fact.

Within the stated scope, we ask the AER to bring four specific matters forward into the draft decision:

1. **A procurement-preference weighting in the waiver framework.** Where the contestable elements of a proposed waiver activity can practicably be procured from the competitive market, an applicant committing to competitive arm's-length procurement of those elements should be assessed as presenting materially lower competition risk than one proposing to self-supply. This fits directly within the in-scope question of whether the waiver decision-making framework adequately considers the benefits and risks of granting a waiver. It also gives practical content to a last-resort principle: before a DNSP self-supplies a contestable service, it should be able to show the market could not deliver it.
2. **Standard open-standards interoperability conditions for CER and EVCI waivers.** Assets deployed under a waiver should be required to operate on open protocols (OCPP between the charger and its

management system; OCPI for roaming and third-party eMSP access) so the asset remains serviceable by any compliant provider and is not captured by a single operator or platform. Given the volume of waiver activity the Call for Input records (47 applications and matters across 2022 to 2025, increasingly concerning EV charging and community batteries), a standard-conditions library would also reduce the AER's per-application burden.

3. **Non-discrimination expressed as testable behaviours.** The in-scope examination of functional separation (use of regulated assets, information, systems, staff and customer relationships to advantage affiliated entities) should land in obligations that are observable: equal access, on equal timelines and equal terms, to connection processes, connection-related data, hosting-capacity and siting information for affiliated and unaffiliated parties alike, with equivalence demonstrable on request and reported. These obligations cost little to a network without an affiliated contestable business, consistent with the risk-weighted approach in item 1.
4. **Shared-asset settings that keep hosting workable.** On the materiality threshold and sharing ratio specifically, we do not put forward alternative numbers; we have not done the modelling to defend any. We ask instead that the review apply one design principle when it tests them: regulated assets hosting contestable services, such as poles and streetlight columns hosting third-party chargers, is one of the most efficient deployment models available, and the benefit-sharing mechanism should not make such hosting uneconomic for networks to offer. Two supporting asks: hosting access should be offered on published, non-discriminatory terms available to all providers, and where a DNSP or its affiliate uses the asset itself, it should face the same charges it levies on third parties.

We also support the in-scope strengthening of reporting: AER publication of waiver activity, conditions, compliance and complaints outcomes would let smaller unaffiliated providers rely on transparency rather than on their capacity to litigate concerns.

Question 5

Do you have suggestions on ways that we can make it easier for stakeholders to effectively engage with the review process?

Two brief suggestions. First, the per-question submission form works well for smaller organisations; please retain it for the draft decision stage. Second, we ask to participate in the stage-two targeted workshop for unaffiliated service providers and industry bodies, and suggest the AER publish waiver-register and reporting data in a machine-readable form so providers can engage with the evidence base directly rather than through summaries.

In closing

The common thread in these recommendations is that they ask for nothing that disadvantages networks. A DNSP reading them should find its cheapest compliant path clearly marked: procure the contestable layer competitively, deploy on open standards, offer hosting on published equal terms. We would welcome the opportunity to participate in the stage-two workshop for unaffiliated service providers and industry bodies.

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