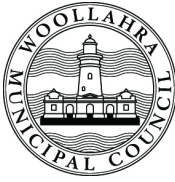


Submission to the AEMC

Submission to the Accelerating Electric Vehicle Charging Program rule change request (Project ERC0436)

Trim Reference: A17/0586
Issued: Friday 3rd of July 2026

Contact: Anthony Weinberg
Regional Environment Program Manager
Phone: (02) 9369 8207
Mobile: 0439 253 438
Email: anthony.weinberg@waverley.nsw.gov.au



Thank you for the opportunity to comment on the Accelerating Electric Vehicle Charging Program rule change request. Randwick, Waverley and Woollahra Councils make this joint submission. Together we run the largest local-government public electric vehicle (EV) charging network in Australia: more than 300 public charging ports across our three areas — 90 that we own and operate (70 AC and 20 DC), and the remainder that we facilitate through agreements with charging providers. Our own chargers have delivered over 150,000 charging sessions since 2019, around 80% of all 300 spaces are dedicated to EV charging, and EV uptake in our area is roughly three times the NSW average.

Our councils are neutral on the funding mechanism for public. Whether costs are recovered through the network businesses and electricity customers is a matter for network and consumer bodies, and we comment on it only briefly. We support faster deployment of public charging, and our focus is on the quality of what is built — that it is effective infrastructure and a good experience for residents and drivers, which in turn supports the program's emissions, value-for-money and equity goals.

This submission sets out suggested considerations for the program's design, and responds to the relevant consultation questions. We would welcome the opportunity to discuss it and to share our operational data.

Yours sincerely

Randwick, Waverley and Woollahra Councils



Submission — Accelerating Electric Vehicle Charging Program

The program proposes around 14,000 new public chargers, of which the large majority are lower-power AC kerbside chargers on power poles. Based on our operational experience of running the largest council charging network in Australia, we think a different mix and a stronger role for councils could potentially deliver better outcomes for residents and drivers.

The program is largely premised on the idea that people who see EV chargers in their neighbourhood become more likely to buy an EV. It is worth thinking through what happens if that premise succeeds. Those new drivers will need somewhere reliable to charge. If the chargers they see are lower-power and do not have a dedicated bay — so are often blocked by other vehicles — the experience may not support uptake, and demand will quickly grow for better charging. The program should plan from the outset for how and when sites are upgraded to dedicated bays or to DC charging, because installing a charger is only the beginning of the project.

Suggested considerations for program design

We offer the following considerations. They are intended to be constructive and to help the program deliver effective public charging.

1. Consider a metropolitan DC pole-mounted option, with dedicated parking, alongside (not instead of) the AC options. It could be CPO-led where commercial, with network delivery only as a back-up where operators decline, using the same funding approach the program already proposes for regional DC — so it may not require significant changes to the program's structure. We note that pole-mounted DC chargers are only now becoming available in Australia and remain limited, but the technology is moving quickly; a few years ago there were no pole-mounted chargers at all, AC or DC.
2. Compare success measured by charging capacity — the energy actually delivered per space (kW and kWh) — rather than by the number of plugs. Not all plugs are equal: a 22 kW AC charger rarely delivers 22 kW in practice (typically between 6.5 kW and 10.5 kW), and a non-dedicated charger delivers very little opportunity for charging.
3. Base the rollout on how drivers actually charge. Our operational data show drivers prefer higher-power charging and that a reserved bay is important to how much a charger is used. The visibility of a charger alone does not appear to drive uptake. Consider how often drivers typically need to charge (around 1-2 times per week) and if 'opportunity' charging has been a success anywhere in the world.
4. Recognise that dedicated, higher-capacity chargers deliver far more energy per space and reduce the impact on parking. Where parking is contested, fewer higher-value sites are easier to justify and manage than many lower-value ones.



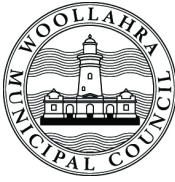
5. Future-proof every site. Where lower-power AC is installed, ensure that it is suitable for being dedicated in the future, and that it does not block a later upgrade to DC — consider cable sizes, circuit-breaker and supply capacity, and retaining parking space where a future DC charger could go. Sites suitable for DC should be identified early.
6. Consult councils and give us a clear ability to reject unsuitable sites. There can be friction between DNSPs and councils due to both entities often working in the road reserve; to avoid this the program should set clear roles for each and a defined structure for how they engage with the program and with one another.
7. Provide centralised, national tools rather than leaving each council to build its own: a demand-request portal (like the Netherlands), shared mapping of network capacity and suitable poles that also reflects existing chargers, and standardised consultation materials, FAQs and community education. A single map could provide transparent information for all stakeholders, including CPOs, DNSPs, Local Councils and Councillors, residents, & drivers. This map could similarly show actual utilisation data to inform where more chargers are needed (i.e. areas where chargers are at high utilisation) and where they are not. Note that this does not currently exist, and that Councils and CPOs therefore cannot make informed decisions.
8. Directly incentivise whoever owns and operates the chargers to run them well. A pain-share / gain-share arrangement tied to high uptime and high utilisation (99%+) would help. In our experience, outcomes suffer when one party selects the chargers and another operates and maintains them without a shared incentive.
9. Plan and fund the program beyond installation. Installing a charger is often the simplest part and the beginning, not the end. Some program funding should support the long-term tools, oversight and programs needed to keep outcomes good for drivers once chargers are in the ground.
10. Support roaming and interoperability with existing apps. Drivers take time to learn charging apps, and today many chargers already roam — for example Chargefox with EVX, BP and AGL. The roaming envisaged in the proposal appears different; new apps should roam with the ones drivers already use.

Response to the consultation questions

Question 1 — Problem statement

Do you agree with the problem statement, including whether there is a “chicken and egg” problem, a market failure in regional/remote blackspots, and whether DNSP processes and fees are barriers?

We agree there is a problem worth addressing, but in some areas rather than everywhere. There is a genuine gap in parts of regional and remote Australia- and in some metro areas - and there are real barriers in connection processes, site



identification and access fees. We would put less weight on framing the whole issue as a shortage of AC kerbside charging.

Importantly, the program should take existing charging into account. Some areas — including ours, with more than 300 public ports — are already partially serviced, and adding more chargers here may add little benefit. The best way to manage this is to build existing chargers into the mapping used to select areas, so effort goes where it is genuinely needed. Site selection should not be left to the network businesses alone; councils should be closely involved, because we hold the local knowledge on parking, access and suitability.

Question 2 — Emissions reduction (methodology and assumptions)

Do you have views on the methodology and assumptions in the emissions modelling?

Our main point is that the modelling could consider charging capacity — the power and energy actually delivered — rather than treating every public charger as equivalent. The modelling assumes a flat number of EVs supported per public charger, but a low-power, non-dedicated plug supports far fewer than a dedicated DC charger.

Our operational data, analysed by UNSW, illustrate the difference (these are well-established sites in an area of high EV uptake):

- A 22 kW AC charger typically delivers only about 6.5–10.5 kW in practice, because most EVs accept around 7 kW on AC and only some accept the full 22 kW. More vehicles able to use 22 kW may arrive over time, but this is uncertain.
 - A well-established, dedicated 22 kW AC charger operating near its useful maximum provides around 16,000 kWh per space each year (roughly eight EVs' worth).
 - A well-established, dedicated 35 kW DC charger (which uses the same electrical connection as a dual port 22 kW AC charger) provides around 60,000 kWh per space each year (roughly thirty EVs' worth). These 35 kW EV chargers will also soon be upgraded to 50 kW EV chargers with very minor electrical works.
 - A non-dedicated 22 kW charger provides much less — between about 0 and 1,600 kWh per year at current EV uptake — because it is often blocked by other vehicles.
- Note that these are actual numbers for existing and well established chargers.

On this basis a non-dedicated AC plug can often support well under one EV, not the 30 figure assumed. We suggest the program consider and compare its emissions case against a model based on capacity (kW or kWh delivered per space), and avoid treating all plugs the same.



Question 3 — Other benefits and an enduring market design

Do you have views on the wider benefits, including insights for an enduring market design?

The most useful legacy of the program would be the lessons it provides for a lasting design — provided it builds the right things and learns from real use. Good practice, and our own experience, is to match the charger type to how a site is used: slower charging where vehicles dwell for hours, faster charging where they stop briefly, decided on a strategic, data-led basis rather than a single default technology.

A practical way to build in the lessons is to require sites to be future-proof — adequate cable sizes, circuit-breaker and supply capacity, and space retained where a future DC charger could be installed — and to publish standardised data on how much energy each site actually delivers, so the two technologies can be compared in real use. Industry analysis has also called for a national EV charging roadmap to 2035, with better underlying data and data-driven targets for each charging type (Charging Ahead, 2025). We support that direction; the shared mapping and standardised data we describe would help deliver it. We note that ARENA are also considering funding another public EV charging map, and that our preference is for maps like theirs should be integrated into a single usable map for the whole industry - not another separate map.

Question 8 — Alternative solutions

Are there alternative solutions the Commission should consider?

We believe a metropolitan DC option could be considered, regardless of who would own or operate them. Pole-mounted DC with dedicated parking delivers far more useful charging per space than low-power AC, needs broadly similar connection and approval effort, and could use the same funding approach already proposed for regional DC. It could add an option, not replace AC, and could be CPO-led with network delivery only as a back-up. Industry analysis (Charging Ahead, Verdant Vision, 2025) estimates Australia will need around 25,000–40,000 public DC plugs by 2030, alongside roughly double that number in AC — pointing to a balanced mix rather than an AC-dominated one.

If a metropolitan DC option is not taken up, the program should at least ensure that installing AC chargers does not get in the way of future DC. We are already finding it difficult to locate suitable DC sites because of the number of AC chargers in place, and the program's five-year timeframe could lock this in and delay better options. Sites should be chosen and built so a future DC charger can replace or join them without starting again.

The program should also consider what could change within the five-year timeframe. CPOs may be ready to take over DNSP sites before then. Similarly, new technologies such as plug-and-charge' (enabled by ISO 15118), vehicle-to-grid and more pole-



mounted DC charging units are likely to come to market. New and better technologies should not be locked out from drivers and CPOs for five years. Note that it was only around 2023/24 that the first AC pole chargers were becoming available.

Question 10 — The role of DNSPs and councils

Early views on the role of DNSPs — as provider of last resort in metropolitan areas, and for regional blackspots?

We do not take a position on whether the network businesses should hold an enduring role, or on the funding model — these are matters for the wider review and for network and consumer bodies. Our point is narrower: wherever charging is provided for residents without off-street parking, it needs to be genuinely usable, which favours dedicated, higher-capacity charging.

On the council role: we must be consulted and able to reject sites that are unsuitable on parking, access, safety or planning grounds. For dedicated charging spaces, much of the work sits with councils and does not involve operators or networks, and council input spans several teams (transport, development assessment, traffic and major projects). Rather than assessing how well networks have 'considered' council input, the program should require a jointly agreed site-selection and deployment plan, including how, when and where dedicated spaces and any DC chargers are delivered. Clear roles and a defined engagement structure would reduce friction between councils and DNSPs. This reflects the wider recognition, including in Charging Ahead (2025), that local governments are core enablers of public charging through the land, parking and local knowledge they provide.

Questions 4–7 and 9 — brief responses

Questions 4–6 (cost recovery and timing). We take no position, for or against, on how costs are recovered — a matter for consumer and network bodies. If a shared-funding model proceeds, it should consider avenues for DC charging.

Question 7 (other rule changes). We have no objection to changes that remove genuine barriers to efficient delivery.

Question 9 (end of asset life). Assets should be renewed according to whether the site is still needed and the technology still fit for purpose. Given how quickly charging technology is changing, end-of-life should be an opportunity to upgrade (for example AC to DC) rather than replace like-for-like. Consideration should also be given to what could change within the 5-year timeframe. Before the 5-year mark, CPOs may be ready to take over DNSP sites, and better charging technology will come to market, such as



plug-and-charge' (enabled by ISO 15118), vehicle-to-grid and small pole-mounted DC charging units.

Practical questions to resolve before delivery

A number of delivery questions remain open, most of which fall to councils. Resolving them early — and coordinating them nationally rather than council-by-council — would make delivery faster and more consistent. Key questions include:

- Will councils select the operators, or will there be one per area, and will template licence and dedicated-parking agreements be provided? Who holds the dedicated-parking agreement — the operator or the network? Who holds the insurance for issues in the road reserve?
- Under current NSW legislation an s138 Roads Act approval is required for pole-mounted EV charging. Will this be required for each charger, and how will traffic, planning and community-consultation steps (often the slowest part) be supported? The NSW Kerbside EV Charging Guide (June 2026) already sets out the relevant planning pathways — s138 Roads Act consent and, where required, a Review of Environmental Factors — along with street-typology site selection and dedicated-bay guidance. The federal program should align with resources like this rather than create a separate process.
- What parking restrictions will apply, and what share of sites will be dedicated? How will sites with underground power or metal poles be handled, and who installs signage and line-marking? Note that approximately 30% of our area has underground power so will not receive any chargers as the program is currently designed.
- What are the detailed site-selection criteria (access, cable reach, pole-to-kerb distance, minimum charging duration, cycleways, permits), and will the mapping reflect existing chargers so effort is directed where it is needed?
- Will chargers roam with existing apps, and offer card payment or 'plug-and-play'? What will network-owned chargers charge, relative to operator and council chargers?
- How will non-dedicated sites be converted to dedicated over time, and on what triggers? Could these triggers be standardised and data led across Australia? Many complaints already come to councils about drivers being unable to access non-dedicated chargers, and there should be a central place for these to go rather than to individual councils.
- Will chargers be held to a high uptime standard, and how is that enforced and incentivised? A broken or blocked charger is worse than no charger at all – a commonly heard statement in the industry.
- How will the program interact with existing rollouts, particularly the NSW EV Kerbside Charging Grants? We recommend engaging that team and reviewing its guidelines.



Closing

We support faster deployment of good public charging and take no position on the funding mechanism itself. Our concern is that what is built is genuinely useful to residents and drivers. The program should be designed around the behaviour of electric vehicle drivers and how they charge. Consideration should be given to higher-capacity chargers with dedicated parking, existing coverage of chargers, a clear and well-resourced role for councils, and planning that continues after installation. We would welcome the opportunity to discuss this submission and share our data.