

Submission into the AEMC consultation on ERC0436:

Facilitating EV charging infrastructure rollout under Commonwealth grants

By: Ross De Rango, [REDACTED], June 2026

Reference:

<https://www.aemc.gov.au/rule-changes/facilitating-ev-charging-infrastructure-rollout-under-commonwealth-grants>

Preamble:

Ross is the former Head of Energy and Infrastructure at the Electric Vehicle Council, and has recently founded a new business, Vehicle Charging Solutions Australia.

Ross' background includes:

- Detailed work in the National Construction Code (NCC) to create EV readiness requirements in new buildings,
- Submissions to the Australian Energy Regulator (AER) that have shaped the AER's advice to ministers on consumer protections for EV charging.
- Input into regulatory reset processes, shaping the tariff structures applicable to public charging infrastructure operators in WA, NSW, Victoria, SA, and QLD.
- Close engagement with NSW government on the majority of EV charging programs currently in operation, including the kerbside program.
- Participation in the development of Australian Standards relating to demand response, electric vehicle maintenance, vehicle to grid, and the national electrical wiring rules.

For the avoidance of doubt, this submission is not to be considered the position of the Electric Vehicle Council. It is the position of a very active industry expert.

The key takeaway is:

On the best available public evidence, the proposed plan from DCCEEW is highly likely to reduce EV uptake, by negatively impacting EV buying intention, rather than supporting it.

This makes the DCCEEW rule change request inconsistent with the NEO - hence it should be rejected.

The remainder of this response addresses the specific questions and provides data. Relevant YouGov survey work has been attached along with this submission via the AEMC portal.

QUESTION 1: PROBLEM STATEMENT

Do you agree with the problem statement as described by the proponent? If not, why?

No.

The proponent considers that EVCI is not being rolled out at a rate needed to support emission reduction targets.

This is not correct.

The objective laid out by the climate change authority is for 5 million additional EVs to be on Australian roads by 2035¹.

In Australia, according to the 2021 census², there are approximately 5 million cars that are the second car in a two or three car residence. Most of these can be routinely parked overnight in a driveway or garage, because of our housing mix.

The bulk of these cars could be electrified immediately, with no public infrastructure required at all – because their charging needs can be met with infrastructure that is already installed in the home.

For vehicles that require public charging infrastructure (either as a complete alternative to at-home off-street charging, or as an occasional requirement on long trips) we already have a robust competitive market delivering the infrastructure, supported by a variety of effective government programs at federal, state, and local levels – and increasingly rolling out infrastructure with no government support at all, purely on the commercial viability of the project.

The results of these programs can be seen in successive reports from the IEA, describing the ratio of EVs per EVSE (cars per public charger), and installed capacity of EVSE per EV (kilowatts of public charging installed per car).

The number of EVs on Australian roads is growing – but the amount of charging infrastructure is growing faster, in a functional competitive market.

The data is:

IEA 2024 report, on 2023 data³:

68 EVs per EVSE

¹ <https://www.climatechangeauthority.gov.au/sites/default/files/documents/2025-09/2035%20Targets%20Advice%20Report.pdf>

² <https://www.abs.gov.au/census/find-census-data/quickstats/2021/AUS>

³ <https://www.iea.org/reports/global-ev-outlook-2024/trends-in-electric-vehicle-charging>

0.3kW installed capacity per EV

1.2% of fleet converted to EV.

This source data has repeatedly been used by Ausgrid, Energy Networks Australia, and by the AEMC, in content including websites, federal government election asks, and submissions to parliament. I detailed this in a submission to the senate select committee's work last year:

<https://www.aph.gov.au/DocumentStore.ashx?id=2bbd7dda-c57c-4dba-bf67-950e295ea85a&subId=778050>

So, the parties clamouring for change to the market rules, which have clearly influenced this federal government program design – and the party responsible for rule making, the AEMC - have considered the source to be reputable in the past.

Moving to today, the IEA 2026 report, on 2025 data, says⁴:

40.5 EVs per EVSE in Australia.

1.1kW of installed capacity per EV in Australia.

3% of fleet converted to EV in Australia.

What the change in those data points is saying is that the aggregate capacity of public EV charging infrastructure to deliver energy to the cars on the road has increased by a factor of 3.7 relative to the number of vehicles on the road, and a factor of 9.15 overall... while the size of the fleet of electric vehicles has risen by a factor of 2.5.

It is objectively not the case that the charging infrastructure is failing to keep pace with EV uptake. The rollout of public charging infrastructure, as measured by the aggregate power of public equipment available to charge them, over the last 2 years, has outpaced the uptake of the cars by 370%.

The competitive market is working.

In terms of what that 1.1kW figure means, when converted to asset utilisation:

In Australia, about 80% of charging happens at home, and the drivers need about 2000kWh per year, per car, on average, to do the average ~14,000km of driving distance - which means, the public EV chargers need to deliver about 400kWh per car, per year.

⁴ <https://www.iea.org/reports/global-ev-outlook-2026/electric-vehicle-charging-chap-6-and-10#light-duty-electric-vehicle-charger-deployment>

If there is 1.1kW of public charging infrastructure deployed per car, then at 100% utilisation, it would be delivering about 9,600kWh per year ($1.1\text{kW} \times 24\text{hrs/day} \times 365\text{ days/year}$) per car. The average requirement from the Australian drivers for each car, per above, is ~400kWh per year.

This means that the overall utilisation of the installed capacity of the public chargers is something like 4%. There are peak times, of course - school holidays in a small holiday town are a perfect example.

In those settings, there's routinely queuing for all sorts of stuff, including things like food and petrol. There are also remote locations, where utilisation will always be very low, making the sites non-commercial - and in those locations, state governments have run programs to fill the gaps. The Western Australian coast is a great example.

What there is not is a shortage of useful charging infrastructure in metropolitan centres - because those are commercially viable sites. The businesses running them are making money, and calibrating the timing of their rollout plans to demand for their service.

To be crystal clear: Ensuring that there is enough EV charging infrastructure to meet driver needs at peak times in holiday destination locations, cannot be achieved by deploying thousands of slow chargers on power poles in suburban Sydney and Melbourne.

1. Do you consider there is a “chicken and egg” problem in deploying AC kerbside EV charging infrastructure?

Per above, there is not a general problem with respect to the rollout of charging infrastructure. The uptake of EVs has been rapid, and non-linear. The rollout of public charging infrastructure over the last two years has been even more so, outpacing the uptake of the cars by 370%.

Kerbside AC charging infrastructure is one narrow category, within the broader ecosystem of charging options, both public and private.

It is a category which (primarily due to obstruction from Citipower) we have not seen much of in Victoria – whereas we have seen lots of it in NSW, supported by the very effective NSW Government kerbside program, and not prevented by the NSW DNSPs.

It's been suggested that a shortfall of this particular class of charging infrastructure constitutes a problem... but the suggestions have not generally been based on anything that might be confused for robust evidence, instead being largely informed by modelling produced or funded by organisations that stand to benefit significantly from rate-based

over deployment of this class of infrastructure – such as Ausgrid – or their paid advocates at Energy Networks Australia.

Given this difference in regions, it's worth looking at the outcomes in terms of EV uptake, and comparing this to the presence of this class of infrastructure.

Both NSW and Victoria make vehicle registration data publicly available, segmented by vehicle powertrain:

NSW: <https://www.transport.nsw.gov.au/data-and-research/drives-reporting-portal/registration-snapshot-report>

VIC: <https://opendata.transport.vic.gov.au/dataset/whole-fleet-vehicle-registration-snapshot-by-postcode>

In NSW, the most granular locational filter is for LGA. I've picked Randwick for this exercise. I've used the 28 Feb 2026 snapshot date to marry up roughly with Q1 2026 from the Vic data.

The total number of registrations is 80,571, with the total number of BEVs being 2,265

This is 2.8% fleet penetration.

In Victoria, we have postcode, rather than LGA. I've started with 3055, 3056, 3057 – which covers West Brunswick, Brunswick, and East Brunswick.

Pivot tabling the Victorian data in excel looks like this:

Sum of TOTAL1	Column Labels			
Row Labels	3055	3056	3057	Grand Total
D	1065	4536	950	6551
E	200	498	228	926
G	29	56	18	103
M	301	511	217	1029
O	3	4	2	9
P	7174	13050	6466	26690
(blank)		1		1
Grand Total	8772	18656	7881	35309

"E" is electric. "M" is a mixture of PHEV and mild hybrid.

Looking at the "E"s, that's 2.6% penetration.

Randwick is very fractionally ahead of Brunswick... noting that average household income is about 15% higher according to 2021 census data, and they've had massive state government support rolling out more charging infrastructure.

The difference in terms of number of cars required to get Brunswick from 2.6% to 2.8% is 70 vehicles, on a base of ~35,000 vehicles... it'll take about 6-8 weeks at current EV sales volumes to achieve that incremental change.

In terms of AC kerbside charging infrastructure, there is none in Brunswick today. Merribek city council are planning to deploy a handful (less than 10) under a trial at some stage soon. Across Brunswick (East, West, and centre) there are 8 public AC charging locations.

According to data recently released by Waverley, Randwick, and Woollahra Councils, Randwick has 62 AC charging locations, many of them 'kerbside'⁵.

Plenty of suburbs can be compared – but it's clear from this that there is not actually a clear correlation between the rollout of lots of AC public chargers (kerbside or otherwise) and EV uptake.

Indeed, if we lift the focus to state level, Victoria, Qld, NSW, and WA all have relatively similar rates of EV uptake as a percentage of fleet.

NSW has lots of kerbside, pole mounted AC EV chargers, because of the NSW government program, and an absence of obstruction of this class of infrastructure by their DNSPs. Qld and WA have none, Victoria has virtually none.

These results, in terms of the absence of clear linkage between AC kerbside infrastructure and overall EV uptake, are not actually surprising to anyone with expertise in this space.

Many studies have shown that the vast majority of Australians can do most of their charging at home, and kerbside AC charging is just one of a spread of options available to those who cannot. DC chargers in metropolitan shopping centres, for example, enjoy very high utilisation, because a driver can get their weeks' worth of energy for their car while picking up their weeks' worth of groceries.

We can also look at a practical example of what happens when extraordinarily large numbers of EV chargers are rolled out, relative to the numbers of cars – Because Korea has done exactly that, leveraging KEPCO, the state-owned utility, to do it.

⁵ <https://zenodo.org/records/19233669>

The data from the 2026 IEA report on Korea indicates 1 EV charger per 2 EVs... and 9.2kW of installed capacity per EV. This is about 20 times the relative number of chargers per car than Australia, and about 9 times the installed power capacity.

And yet, Korean EV uptake lags Australia – in 2025, on the IEA data, they recorded 11% of new car sales being EV, relative to Australia's 15%.

So – from both local and international data – the only reasonable conclusion is that simply rolling out large numbers of AC EV chargers will not positively move the needle on EV uptake.

That Energy Networks Australia and Ausgrid have paid for modelling to suggest otherwise, or that some federal government employees seem to believe that modelling, does not make it true.

Having dispensed with the relative importance of rolling out this particular class of infrastructure, we can then separately consider whether there is a market failure.

In NSW, where the DNSPs have generally refrained from using their various powers to prevent powerpole mounted EV charging infrastructure from being deployed, there is lots of it. NSW government has run multiple rounds of a successful program, in close collaboration with competitive charge point operators and the local councils that own and manage the parking spaces.

There's an emergent competitive market, with many players, serving a segment of EV drivers.

In Victoria, where the DNSPs (in particular Citipower) have used their various powers over a period of years to obstruct the rollout of powerpole mounted EV chargers, there are very few of them.

This is not a market failure – it is a regulatory failure. A foreign-owned for-profit monopoly operating in Victoria was able to prevent a particular class of public infrastructure from being deployed, despite the Victorian state government trying to fund competitive players to roll it out.

This is being corrected for, by the Victorian government, through their recent regulatory statement⁶.

2. Do you agree that there is a market failure for deployment of EV charging in regional and remote blackspots?

⁶ https://www.energy.vic.gov.au/__data/assets/pdf_file/0024/785031/ev-charging-regulatory-statement.pdf

Neither the proposal, nor this consultation, has made clear precisely what is meant by regional or remote, or what is meant by market failure.

There are regional parts of Australia, on major road routes, where the deployment of public fast charging infrastructure is commercially viable without subsidy. This has been the case for several years, and is evidenced by the presence of lots of competing players offering fast charging infrastructure on those routes. The freeways linking Adelaide, Melbourne, Sydney and Brisbane are good examples of this.

There are regional parts of Australia away from major road routes, where deployment of fast charging infrastructure has been achieved through government co-funding, at both state and federal level. This has included routes like the Nullabor, the Western Australian coast, the routes from the east coast of Queensland to Mt Isa. Many of these sites would be non-commercial – but they exist, largely because state governments have run programs on the order of tens of millions of dollars to enable commercial players to fill the gaps.

Increasingly, the places in the country where EV charging is difficult to find are similar to the places in which drivers bring their own petrol or diesel with them. Most Australians don't go to those places.... In the same way that most Australians don't own or drive vehicles that would be suitable for tackling the Birdsville track. A future state where the drivers that do go to those maximally remote places take a PHEV, rather than a BEV, is entirely consistent with achieving our national climate targets, without requiring EV charging infrastructure in the most remote parts of the country any time soon.

Indeed, I personally took a PHEV with my family in it to Lake Mungo back in 2018.... As it happened, I rescued a couple whose petrol car had broken down that day.

The question of how much government support or cross-subsidy is needed now, and is likely to be needed in future, is worth asking in the context of consumer spending on the technology that is being enabled. In May 2026, Australians purchased about 30,000 new EVs. If we assume an average purchase price of \$50k, that's \$1.5 Billion per month - a run rate of about \$18 Billion per year.

Government support at state and federal level for all public charging infrastructure (including remote) is about two orders of magnitude lower than this – and should fall over time, rather than rise, because the infrastructure build will get more commercially viable in more places over time, as more of the vehicles on the road become customers for businesses offering public EV charging services.

This said, it can be expected that it will continue to be the case that if public fast charging infrastructure is to exist in remote locations, especially in the early stages of the transition to EVs, some support will be needed.

Governments (particularly state governments) are well placed to make the determination as to what level of support is needed, what should be built, and where it should be built: they are directly answerable to the citizenry, the money with which they co-fund this type of asset is collected progressively through taxation.

DNSPs, by comparison, are not answerable to the citizenry – rather, they are answerable to their shareholders. And, the money with which they would fund this type of asset is collected regressively, through energy bills.

The fact that remote charging infrastructure could be deployed in a DNSP rate base, does not mean that it is a good idea. A better approach would be for the relevant state government to tender for service provision, and award contracts through a competitive process, in close consultation with the local governments that are best placed to understand the needs of their communities.

3. Do you consider the following DNSP processes and prices to be barriers to efficient EVCI deployment:

Yes

a. connection processes, including timeframes and costs?

Much of this was covered in a consultation process run by DCCEE two years ago:

<https://consult.dcccew.gov.au/streamlining-network-connection-processes-for-cer-and-evse>

Very little effective work was done by the federal government to resolve the issues raised in that report. Instead, we have the rule change request that this consultation addresses, into the federal government's plan to expand the role of the DNSPs, rather than requiring them to perform their core tasks more effectively.

As a specific example, BP highlighted in a 2025 submission to NSW parliament⁷ that:

“bp pulse has redirected capital to other countries due to our inability to secure grid connections and rollout infrastructure at our planned rate in Australia”

That's a global multinational, de-prioritising Australia for construction of public fast charging facilities, because network connections are a bigger barrier in Australia than they are in other countries.

⁷ <https://www.parliament.nsw.gov.au/ladocs/submissions/90091/Submission%2083%20-%20BP.pdf>

Ampol has made repeated statements in the press to this effect as well⁸, missing their planned deployment schedules for public infrastructure because Australian DNSPs are slow.

A large number of CPOs have made similar statements, on the record, to parliamentary inquiries into this matter in Victoria and NSW.

By global standards, and according to the businesses that have no choice but to work with our DNSPs, our DNSPs are woeful at the task of quickly providing a connection - and their failure to be good at their core responsibilities is inhibiting not just the speed of the EV charging rollout, but also the amount of infrastructure getting deployed by private capital.

It should not be surprising that this is the case – after all, they are monopolies, so there's no competitive pressure forcing them to be quick, lest they lose business or market share. And, unlike in the case of reliability where we have a regulatory mechanism in place (STPIS) to attach financial consequences to underperformance, there's nothing like that in place for connection timeframes.

Indeed, Ausgrid's CEO has gone on public record that a business can expect a new connection for a typical fast charging site to take a total of 350 business days⁹. For context, the power level being talked about there is in the 350 to 500kVA range. That's a power level that is within the scope of a pole mounted transformer, that can physically be installed by a small team in a couple of weeks.... And yet the expectation being set, by Ausgrid's CEO, in the media, is that it should be considered reasonable for the process to take a year and a half.

b. site identification processes?

The key things that a competitive CPO needs from a DNSP are:

- 1) Visibility of network capacity, at a sufficiently granular level to enable rapid assessment of many sites. This helps to increase the likelihood that when a formal connection request is undertaken, it will be successful. It also improves efficiency for the DNSP, by reducing the number of connection requests that need to be made per successfully deployed charging station.
- 2) An efficient connection process
- 3) A commercially viable tariff structure.

⁸ <https://www.afr.com/companies/energy/ampol-says-transition-challenging-as-fuel-demand-hits-record-20250221-p5le31>

⁹ <https://thedriven.io/2025/05/14/ampol-dumps-retail-electricity-businesses-to-focus-on-ev-charging/>

Item 1, above, is related to this question of site identification. It has been consulted on multiple times, including by the AER:

<https://www.aer.gov.au/industry/registers/resources/reviews/network-visibility>

The best solution along these lines was delivered in about 2023 by Essential Energy¹⁰. They provide, at no cost and accessible to everyone, a mapping tool with estimates of peak consumption at every asset they own, down to the level of pole and pad mount transformer, along with the size of those assets.

Other DNSPs choose not provide data down to this level in this user-friendly manner, and are not required to.

This could be addressed by a rule change request, to extend the obligation under DAPR reporting from the substation level, down to an estimate of pole and pad mount transformers. The actual data could be estimated from smart meters and feeder monitoring, because it does not need to be perfect in order to be useful for the objective of letting the proponent filter out those locations least likely to be good candidates for new connection requests or site connection upgrades.

For avoidance of doubt, it's not necessary to put instrumentation on every transformer in order to do something like what Essential Energy did as a side project, and on a shoestring budget.

Unfortunately, despite the problem being clearly highlighted, and the solution being clearly demonstrated by a regional DNSP years ago, we have not seen a rule change to bring this about.

c. facility access fees?

Facilities Access Agreements are at the core of the reason that there are hundreds of pole mounted chargers in NSW, and virtually none in Victoria. A pre-condition for the commercial rollout of pole mounted charging infrastructure is that the facilities access agreement – essentially the rent for the space on the pole – not be excessive.

Citipower's ask was in the \$3,500-\$4,000 per year range... for an asset that might generate \$2-3k per year in top line revenue. The AER has recently moved to require the determination of the price for the FAA to be cost reflective – but it will take time for this

¹⁰

<https://essentialenergy.maps.arcgis.com/apps/webappviewer/index.html?id=dbd23384893b4412a0968ab7ae1bcc57>

change to wash through in practice, and Citipower very clearly have a desire to own and operate this kind of equipment themselves – so we will see how it goes.

QUESTION 2: EMISSIONS REDUCTION

Do you have any views on the proponent's assessment of the emissions reduction benefits?

Yes

1. Do you agree with the methodology of the proponent's modelling? If not, why?

I am not convinced by the modelling, because I consider the underlying assumption informing the model - that this program will deliver an increase in the number of EVs on the road - to be substantially incorrect.

The detail of how one computes the benefit of EV vs petrol vehicles is not relevant to securing an emissions reduction through a program, if the program design itself will likely discourage EV uptake.

2. Do you agree with the proponent's assumptions in the modelling? If not, why?

No. The modelling assumes that the rapid rollout of large numbers of AC pole mounted EV chargers, without local government being treated as a key stakeholder to ensure that the spaces are dedicated to EV parking, will result in a significant increase in EVs on the road.

Per the earlier response, the real world data in Australia and elsewhere does not support this assumption.

In fact, an independent survey undertaken by Yougov in May 2026 suggests the opposite – when asked what seeing pole mounted EV chargers blocked by petrol cars would do to EV buying intention, a representative sample of Australians above the age of 18 responded with:

48% - no impact

37% - less likely to buy an EV

15% - more likely to buy an EV.

If this program operates in accordance with its design, it will likely succeed in deploying a very large number of EV charging installations that will often be visibly unavailable, by virtue of being blocked by petrol cars – with the outcome that EV uptake is, on average, discouraged, rather than encouraged.

This means that in addition to further disrupting a functional market, expending taxpayers dollars, and driving up energy bills – this plan will quite likely fail to deliver infrastructure that is useful to EV drivers, and can be expected to slow down overall EV uptake.

This is actually a fairly intuitive result. Imagine what goes through the mind of a person who is currently driving a petrol car, and is thinking about going electric, when the public EV chargers they see in their neighbourhood are regularly blocked by petrol cars. Is it realistic to assume that the presence of infrastructure which they can clearly see is not reliably useful for its intended purpose, will encourage them to switch to a product that depends on the usability of that infrastructure?

Put another way – the federal government considers¹¹ that funding and support for EV charging equipment generally (not including kerbside) should be contingent on each plug having 98% uptime. This is because it was recognised by the team that put the MOS together that if drivers arrive at an EV charging site that they expect to be able to use, and cannot use, that this is a problem. By setting the standard at 98%, they're saying that it's acceptable for a given plug to be out of action about 1 time in 50 that an EV driver turns up to use it.

Based on the two visits I undertook to the DNSP owned pole mounted AC chargers in Melbourne¹², I found 4 out of 6 blocked by petrol cars on my first visit, and 5 out of 8 blocked on my second visit. Before we even get to 'is the charger working', the potential uptime from the point of view of the driver is limited to 35% by physical availability. A driver attempting to use one of these sites could reasonably expect it to be unusable about 32 times out of 50... with no way to know in advance, because the presence of a petrol car in the parking bay is not something the equipment itself is able to detect (unlike, for example, a hardware fault that might take public charger offline until a service technician arrives to fix it).

As to why the program will likely deliver the outcome of chargers deployed without parking spaces reserved: the DNSP, which under the program design has the role of selecting the poles and running the tenders for the competitive CPOs, has a strong commercial incentive for the competitive players in the market to **not** take up the poles they offer – because, in the event that the tender fails to result in a CPO taking up the offer, the DNSP gets to rate base the hardware, which is financially desirable for them.

One of the key factors that the competitive CPOs will be looking for in deployments of this type is that the parking space is reservable, at minimal additional cost, for usage by EVs – because absent that, these sites will be blocked by petrol cars much of the time.

¹¹ <https://www.dcceew.gov.au/sites/default/files/documents/minimum-operating-standards-electric-vehicles-charging-infrastructure.pdf>

¹² https://www.linkedin.com/posts/ross-de-rango-29a88013_two-months-ago-i-posted-about-citipowers-activity-7460786260169637888-GRZy

Evidence of this has been provided publicly by myself based on the DNSP-led rollout of kerbside AC charging in Victoria¹³. It's also apparent in the NSW kerbside program, from the data released by Waverley, Randwick and Woollahra councils – the **only** operator of kerbside AC charging that is rolling out sites without reserved parking spaces is Plus ES, a part of Ausgrid Group. According to the data, Plus ES have rolled out 58 of their 79 sites this way.

And, of course, it has long been the publicly established position of Ausgrid that this inefficient rollout with a majority of sites being low power, without reserved parking, is precisely what they want to do:

<https://www.abc.net.au/news/2025-05-14/ev-charging-stations-on-power-poles/105089316>

To ensure that the parking spaces are reservable, it is local government who are the critical stakeholder – because they own and manage the parking spaces. Local governments, despite being absolutely central to the success of the NSW government kerbside program, were excluded from federal government consultation in the lead up to this rule change, and are not part of the federal government's process as laid out in this rule change request.

Multiple local governments are also highly cognisant of the issue and the challenges – for example, detailed data has been published by Inner West Council¹⁴, showing that EV chargers with dedicated parking spaces massively out-perform EV chargers without dedicated spaces across that LGA as well.

If local governments are **not** positively vetting the poles selected by DNSPs to confirm that the parking spaces will be reservable and enforceable for EV parking only, then CPOs can have no confidence that those spaces will be reserved for EV parking – which will render the bulk of them non-commercial, meaning they'll end up in the DNSP RABs. At that point, the DNSP has no incentive to make any effort to secure the parking space – because as a RAB asset, low utilisation will not impact their profit. In fact, low utilisation could perversely (and of course incorrectly) be pointed to as indication that more of them are needed.

Had federal government consulted with local governments during the design phase of this program, before submitting a rule change request, they would have learned about this dynamic, and many other things that could have informed a better program design. Several of the people that federal government **did** consult with – myself included –

¹³ https://www.linkedin.com/posts/ross-de-rango-29a88013_two-months-ago-i-posted-about-citipowers-activity-7460786260169637888-GRZy

¹⁴ <https://media.licdn.com/dms/document/media/v2/D561FAQHNZZFBuqcn2g/feedshare-document-sanitized-pdf/B56Z6Lpko8KwA8-/0/1780459392808?e=1781092800&v=beta&t=x5FZL-t1XARqcpZnZjA6o6rKEj9C-DI5kpRSK5arsf8>

made it very clear that local government should be consulted, to the extent of providing names and contact details.

Following the rule change request, according to various folks I've spoken to, the federal government has run just two webinars for local government consultation, attracting hundreds of attendees. Some of those attendees have told me that they do not believe that this consultation is meaningful. By comparison, the federal government spoke to every single DNSP in focussed interviews, in the initial program design phase. That seems a bit more like actual consultation designed to meet stakeholder expectations, rather than a tissue thin veneer designed to look like consultation.

QUESTION 3: OTHER BENEFITS

Do you have any views on the proponent's assessment of the benefits of the funding program beyond emissions reduction, including the potential for it to provide insights to inform an enduring market design for EVCI?

The proposed benefits of the program, beyond the claimed emissions reduction benefit (which, per above, appears to be non-existent on account of a fundamentally flawed assumption regarding what the program will achieve in terms of EV uptake), are essentially things like:

- Reduce connection costs
- Reduce connection timeframes
- Cap facilities access agreement prices.

None of these benefits require providing DNSPs an opportunity to incorporate a new class of hardware asset, that is currently competitively owned, into their rate bases.

All of these benefits could be readily achieved through the AEMC determining that the appropriate course of action is to make a more preferential rule change, that delivers on the claimed benefits, without compromising the competitive nature of the market.

In terms of the potential of the program to inform an enduring market design for EVCI... the existing market is competitive, functional, and responsive to driver needs. The proposed model is (per above) likely to deliver a very large number of EV chargers that will usually be unusable.

If the program proceeds as drafted, many stakeholders will need to work to ensure that it does not lead to an enduring market design – because that would be destructive to EV uptake in the country.

QUESTION 4: CONTRIBUTIONS FROM ALL ELECTRICITY CONSUMERS

Do you consider it appropriate for EVCI projects approved as part of the funding program to have a difference between the total project costs and the amount CPO's are willing to pay funded through a combination of government funding and contributions from all electricity consumers?

Certainly not in urban areas. There is no market failure; the competitive parts of the sector are getting the job done – per above, rolling out charging infrastructure at a rate 3.7 times faster than the uptake of the cars, on the IEA data.

The prospect of socialising costs across the entire community through a regressive mechanism like energy bills, in cases where it has been conclusively proven that the competitive market is increasingly capable of doing the job on a 'user pays' basis, with falling subsidy support, is simply not defensible.

It's especially not defensible when the asset class (kerbside AC charging) is not today, and never will be, relevant to the vast majority of the population – because the vast majority of Australian drivers have somewhere off-street to park their cars, and therefore have no need for public slow charging infrastructure.

To the extent that support is required to kick-start innovative approaches that aren't yet commercially viable without support, taxpayers funding used to support competitive processes or targeted grants is a far more appropriate approach. With respect to pole mounted kerbside AC charging, NSW government has demonstrated how to do this with successive rounds of their Kerbside program, and the federal government has supported it too through ARENA grants.

If any consideration is to be given to allowing rate-basing of EV charging equipment, the only places in which it might be somewhat defensible are remote locations, at significant distance from any moderately sized population centre, heavily trafficked route, or existing EV charging installation. Places like Lake Mungo, for example, where Essential Energy have infrastructure, but virtually no-one else does.

Even in these locations, it would be more appropriate for state government to run a competitive tender for the provision of the remote location service. It's worth noting that this approach has worked, and is working, to deploy remote EV charging infrastructure across the country.

Using Lake Mungo as an example – Intium, a wholly owned subsidiary of Essential energy, but ring fenced from it, could tender for deployment and operation of public EV charging infrastructure in that location, rather than allowing Essential Energy to rate base the hardware. Intium would be competing with other providers, many of whom have history of successfully rolling out and maintaining remote EV charging infrastructure across – but it's certainly possible that they'd produce the best proposal, leveraging their close relationship with Essential Energy.

QUESTION 5: PROPOSED DNSP RECOVERY OF RESIDUAL COSTS

Do you agree with how the rule change request proposes that residual costs (i.e. net of government funding) for approved EVCI projects be recovered by DNSPs, including the proposals to:

1. Allow a DNSP's RAB to be adjusted to include capex for approved EVCI projects? If not, why?

No. Per above, it is not necessary for the achievement of the core objectives of the program (achieving sufficient EV uptake to meet climate targets) that DNSPs be enabled to incorporate costs related to EVCI projects.

There is already a clear pathway for DNSPs to augment their RABs as and when the buildout of competitively owned EVCI leads to requirements for network augmentation.

2. Allow a DNSP's RAB to be adjusted to include opex for approved EVCI projects for the first five years? If not, why?

No. Per above, it is not necessary for the achievement of the core objectives of the program (achieving sufficient EV uptake to meet climate targets) that DNSPs be enabled to incorporate costs related to EVCI projects.

There is already a clear pathway for DNSPs to augment their RABs as and when the buildout of competitively owned EVCI leads to requirements for network augmentation.

3. Treat any ongoing opex in subsequent regulatory control periods in the same way as opex for standard control services under the NER framework? If not, why?

No comment

QUESTION 6: PROPOSED TIMING FOR DNSPS COST RECOVERY

Do you agree with the proponent's proposal that DNSPs recover costs in the next regulatory control period?

If not, should DNSPs instead be able to recover costs incurred in the current regulatory control period through a reopener?

No. DNSPs should not be permitted to expand their RABs into the ownership of EVCI, as there is no good reason for it.

Given this, new cost recovery considerations are moot.

QUESTION 7: OTHER CHANGES TO THE NATIONAL ELECTRICITY RULES

Do you agree with the proposals that:

1. EVCI connection works should not be classified as connection services under the NER? If not, why?

In the case of pole mounted kerbside AC EVCI, the size and complexity of the connection is no larger than that for a standalone domestic house.

The annual energy delivered through the connection point to the pole mounted kerbside AC EVCI, assuming the parking space is reserved and the site is meeting the needs of several EV drivers, will approximate that of a large family home with two EVs.

Given this, it is not clear that the processes and costs for pole mounted kerbside AC EVCI need to be any different to the processes for connecting a standalone house.

Those processes are set up as fixed, reasonable costs in every jurisdiction, with relatively prompt timeframes compared to the negotiated connection processes associated with fast charger installations.

With respect to connection works to support the installation of higher power charging locations, the contention of the CEO of Ausgrid in the media is that it is reasonable for commercial proponents to expect a timeline of 350 business days (ie, well over a year) to secure a connection, in cases where that connection is in the 350-500kVA range. For clarity, a new connection at this size it can be served by a single new transformer, of a size that can be transported on a small flatbed truck, of the standard type that the DNSPs install and maintain as their core responsibility, connected to an existing feeder.

There is clearly a need for this process to get better and faster – but reclassifying the works is not the obvious way to achieve the outcome.

The obvious way to achieve the outcome is to institute a reward / penalty mechanism, similar to what we have had in place for reliability for 20 years (STPIS), to

2. The restricted asset provisions should not apply where they would otherwise prevent or limit a DNSP from delivering an approved EVCI project? If not, why?

The restricted asset and ring fencing provisions exist for very good reason: the protection of competitive markets, and by extension, the protection of consumers, from the unchecked greed of for-profit monopolies.

They should continue to be applied in the case of EVCI.

The proponent has not demonstrated sufficient justification for these consumer protections to be set aside.

In fact, on the data presented above, the proponent has put forward a plan that will spend taxpayers money, drive up energy costs, and discourage EV uptake.

QUESTION 8: ALTERNATIVE SOLUTIONS

Are there alternative solutions for integrating the proponent's funding program in the NER that you think we should consider?

There are abundant other options available to the federal government, should they wish to invest in supporting the rollout of public EV charging infrastructure, within the bounds of the NER – and there are many examples of how they have done so.

When the federal government started supporting EV uptake via ARENA grants to roll out charging networks in 2018¹⁵, adoption of EVs was at a level of around 2,000 new vehicles sold per year¹⁶. Today, our new EV sales are running at a rate of around 300,000 per year – roughly a 150-fold increase in 8 years.

The numbers of EVs Australians are buying is highly relevant, because while the federal government's plan uses the USA and Canada as reference points for numbers of chargers installed, it entirely omits mention of EV uptake in those countries. EV uptake in Australia in 2025 was comfortably ahead of EV uptake in both of those countries, according to IEA data: 15% of new vehicle sales in Australia, compared to 10% in the USA, and 11% in Canada¹⁷.

The UK is ahead of Australia in EV uptake... but the UK has had fuel efficiency standards in place for much longer than Australia, and has a spread of other measures to incentivise EV uptake in place that are not mirrored here. Also, the prevalence of at-home off-street parking in the urban centres of the UK is vastly different to the situation in Australian urban centres – which means a very different quantity and mix of public charging infrastructure will be warranted, independent of who owns that infrastructure.

It is worth noting that while Australia is behind the UK in uptake, we are not far behind, and we are catching up. In May 2026, Australia hit 30% of new vehicle sales being EVs¹⁸ – which is roughly where the UK was up to at the end of 2024 / start of 2025.

In remote locations, the federal government has historically been one of the parties to the rollout, through its support of the NRMA. This has included sites along the Sturt Highway, connecting Adelaide to Darwin, for example.

¹⁵ <https://arena.gov.au/projects/chargefox-electric-vehicle-charging-network-project/>

¹⁶ <https://electricvehiclecouncil.com.au/wp-content/uploads/2020/08/EVC-State-of-EVs-2020-report.pdf>

¹⁷ <https://www.iea.org/data-and-statistics/data-tools/global-ev-data-explorer>

¹⁸ https://www.linkedin.com/posts/mike-costello-cox-automotive_may-vfacts-ugcPost-7467841323249635328-bM4r/

Through ARENA, the federal government has supported over 40 projects of various kinds over the last 10 years, specifically focussed on EVs and EV charging¹⁹.

These projects have included pole mounted kerbside AC EVCI – and they were executed without any need for the consumer protections associated with ring fencing rules being set aside.

In the narrow domain of pole mounted kerbside AC EVCI, NSW government has demonstrated through successive rounds of a highly successful program that hundreds of useful and usable pole mounted AC EVCI can be rolled out, provided the competitive market and local councils are at the heart of the program design – again, without any need for ringfencing to be set aside.

More broadly, every state government has run programs to support a competitive rollout of all sorts of charging infrastructure, including in blackspot areas – and, per the data above, the rollout of infrastructure is outpacing the uptake of the electric cars.

There is no chicken and egg problem here which requires the setting aside of consumer protections in favour of the interests of the monopolies that own the poles and wires. There are foxes, though... who'd have lobbied government for years to tear down the fence around the hen house, so that they can eat the chickens.

And, there are some in government who seem to believe it when the foxes, still chewing on the last bit of chicken they took from the hen house, assure everyone that if only the fence is taken away, they'll make sure that there are plenty of eggs for everyone.

In short – it's not the NER that needs changing here. It's an ill-conceived federal government program that needs changing at proposal stage, before it causes real world harm in the execution stage.

QUESTION 9: END OF ASSET LIVES

What do you think should happen with the EVCI assets, that DNSPs may be responsible for installing under the different proposed funding models, at the end of the EVCI's life (e.g. should DNSPs be able to replace the EVCI)?

DNSPs should not, in the first instance, be owning this type of asset.

If consumer protections are set aside such that they can own this type of asset, then allowing them to automatically replace the assets at end of life locks in further harm to consumers and the competitive market.

¹⁹ <https://arena.gov.au/projects/?project-value-start=0&project-value-end=200000000&technology=electric-vehicles>

Without conceding that it is reasonable for DNSPs to own this type of equipment, were they to be allowed to own it, a specific time limit for each installation incorporating EVCI in the RAB should be rigidly enforced.

QUESTION 10: SUPPLEMENTARY QUESTION Broader considerations of the enduring role of DNSPs in rolling out EVCI are out of scope of this rule change request.

The Commission will be consulting on these issues and asking related questions as part of the consultation for package 1 of the Electricity Network Regulation Review and related rule change requests.

Consultation will be undertaken from June 2026. However, you may wish to share early views on the role of DNSPs in EV charging, including the roles as identified within this rule change request, namely:

- as provider of last resort for kerbside charging in metropolitan areas?**

There is absolutely no need for DNSP ownership of EVCI in metropolitan areas.

The market is working well, and can be expected to continue to work well – unless an intervention like this one screws it up.

Ausgrid's desire to expand their rate base into a new class of asset, and their sustained lobbying efforts along these lines, do not constitute a good justification for breaking a functional market that is delivering the infrastructure Australians need, increasingly on a straight user-pays basis.

- as the provider of EV charging for uncommercial regional blackspots?**

If any consideration is to be given to allowing rate-basing of EV charging equipment, the only places in which it might be somewhat defensible are remote locations, at significant distance from any moderately sized population centre, heavily trafficked route, or existing EV charging installation. Places like Lake Mungo, for example, where Essential Energy have infrastructure, but virtually no-one else does.

Even in these locations, it would be more appropriate for state government to run a competitive tender for the provision of the remote location service. It's worth noting that this approach has worked, and is working, to deploy remote EV charging infrastructure across the country.

AUSTRALIA

Powerpole Charging & EV Purchase Intent

Prepared for :

EV Charging Solutions

May 26

Methodology

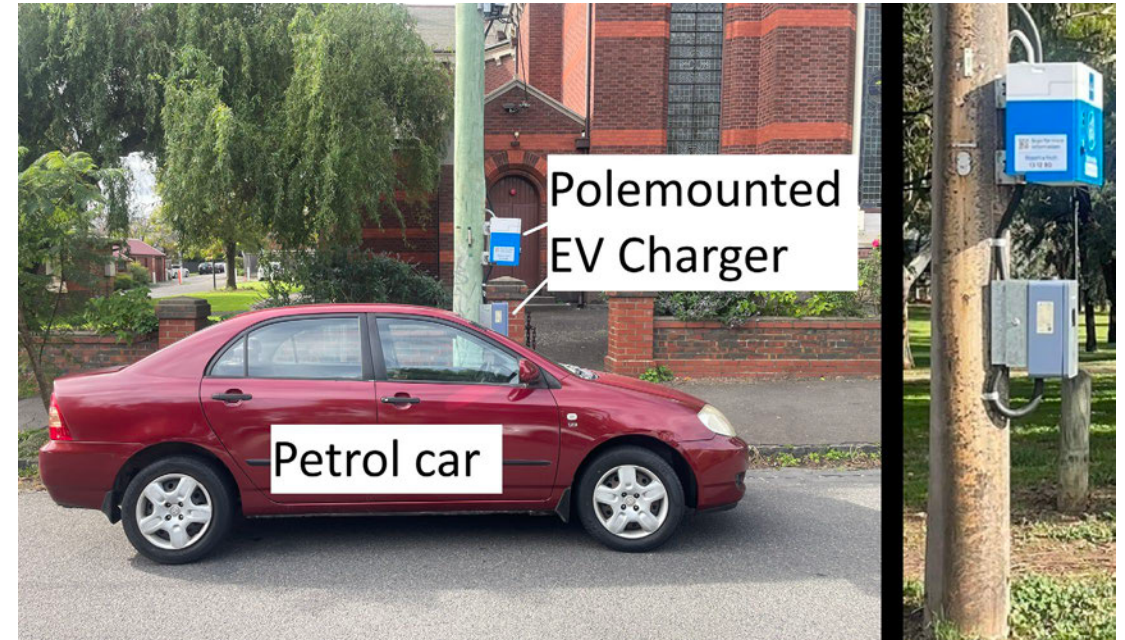
Methodology

- This study was conducted online between 21st - 26th May 2026.
- The sample comprised of a *nationally representative* sample of 1,032 Australians aged 18 years and older.
- A copy of the questionnaire has been included in this report.
- Following the completion of interviewing, the data was weighted by age, gender and region to reflect the latest ABS population estimates.
- Significant differences have been reported at the 95% confidence interval.
- This study has been carried out in accordance with the ISO 20252:2019 standards, to which YouGov is accredited.

Key Findings

Key Findings

- Over four in five (85%) Australians say that if street side powerpoles EV chargers were installed in their neighbourhood and the charging spaces next to them were not reserved exclusively for EV charging, leading to them usually being blocked by petrol vehicles, it would not make them more likely to purchase an EV.
- More specifically, half (48%) of Australians report that it would make no difference to their intention to purchase an EV, and nearly two in five (37%) say that it would even make them less likely to purchase an EV.
- Only 15% of Australians think that it would make them more likely to purchase an EV.
- This lack of impact is particularly pronounced among older Australians as Gen X and Baby Boomer Australians are more likely than their younger counterparts to say this would not impact their intention to purchase an EV (Gen X: 57%, Baby Boomers: 55% compared to Gen Z: 42% and Millennials: 38%).
- Meanwhile younger Australians are more likely to report that it would increase their likelihood to purchase an EV (Gen Z: 28%, Millennials: 23% compared to Gen X: 7% and Baby Boomers: 8%).



Base: n=1,032 Australians 18+

Q1. Thinking about electric vehicle (EV) chargers installed on street side power poles, like in the image below: [Image shown – See image above]. Imagine these chargers were installed in your neighbourhood, and that the parking spaces next to them were not reserved exclusively for EV charging, leading to them usually being blocked by petrol vehicles... How, if at all, would this affect your intention to purchase an EV? Please select the option that best applies

Key Findings

- Regionally, almost nine in ten (89%) of Queenslanders say that it would not increase their likelihood of purchasing an EV, which is more likely than those from NSW (82%) and VIC (82%).
- Australians living outside the 5 major capital cities are more likely to report that it would not increase their likelihood of purchasing an EV compared to those living within the 5 capital cities (91% compared to 81%).
- By housing type, nine in ten (90%) of Australians living in standalone houses say that it would not make them more likely to purchase an EV, which is more likely compared to just 73% of those living in semi-detached, townhouses or terrace houses, and 80% of those living in apartments.

Questionnaire

POWERPOLE EV CHARGER SURVEY	
MARKET	AUSTRALIA
SAMPLE	N=1000 AUSTRALIANS AGED 18+ NATIONALLY REPRESENTATIVE BY AGE, GENDER, LOCATION
QUESTIONNAIRE NAME	POWERPOLE EV CHARGER STUDY
USE AU DEMO TEMPLATE	YES

Qtn #	Question Text	Logic
Demographic questions		
S1	Age	Ask all
S2	Gender	Ask all
S3	Location	Ask all
S4	Children in the household under 18 years	Ask all
S5	Marital status	Ask all
S6	Work status	Ask all
S7	Household income	Ask all
S8	House Type	Ask all
	What type of home do you currently live in?	Ask all
	Please select the option that best applies	
	<i>Single select, randomise</i>	
1.	Flat or apartment	
2.	Standalone or fully detached house	
3.	Townhouse or semi-detached house	
4.	Terrace house	
5.	Other	Fixed
6.	Don't know	Fixed

Thinking about electric vehicle (EV) chargers installed on street side power poles, like in the image below:

Q1



Ask all

Imagine these chargers were installed in your neighbourhood, and that the parking spaces next to them were not reserved exclusively for EV charging, leading to them usually being blocked by petrol vehicles...



How, if at all, would this affect your intention to purchase and EV?

Please select the option that best applies

Single select, reverse

1. It would make me much *less* likely to purchase an EV
2. It would make me a bit *less* likely to purchase an EV
3. It would make no difference to my intention to purchase an EV
4. It would make me a bit *more* likely to purchase an EV
5. It would make me much *more* likely to purchase an EV

Thank you

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