

Submission to the Australian Energy Market Commission

Rule change ERC0436 — Accelerating Electric Vehicle Charging Program

To: Australian Energy Market Commission

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Re: National Electricity Amendment (Facilitating electric vehicle charging infrastructure under Commonwealth grants) Rule 2026 — Consultation paper, 28 May 2026

From: AJMG Solutions — Andrew Giannasca, Founder

Date: 1 June 2026

Confidentiality: None. This submission may be published in full.

About this submission

AJMG Solutions is a boutique strategic advisory firm specialising in transport electrification and urban decarbonisation. We offer these comments from three vantage points rarely combined in one contributor: operating experience inside a commercial kerbside charge point operator, current council-side delivery experience, and behind-the-meter infrastructure experience.

For transparency, we make the following disclosures. Our founder, Andrew Giannasca, was the first employee of JOLT, an Australian-founded kerbside charge point operator (CPO), and worked on the rollout of its Australian network. He no longer works with JOLT in any capacity, but continues to hold a minority equity interest in the company. Separately, AJMG's current work is principally council-side: we advise councils across New South Wales, Victoria, Queensland and South Australia on kerbside charging strategy, planning integration and procurement readiness, and accordingly have an interest in the continued growth of kerbside charging generally rather than in any particular operator. We offer the views below as informed, disclosed industry experience rather than as a disinterested party, and we are comfortable for this submission to be published in full. We also take no position for or against network-led versus contestable delivery of charging — we have worked inside the contestable model and now advise on network-led and council-procured models alike. Our interest is in good delivery, not in any one model prevailing.

Summary position

AJMG supports the rule change. It is a proportionate, scope-limited and time-bound way to address a genuine market-formation problem, and it is well designed. Our consistent lens is delivery quality and transparency, with councils properly involved, rather than a preference for any one delivery model. Where the networks deploy infrastructure under the program — at kerbside sites a CPO does not take, and in regional blackspots — the network owns the asset while a contestable operator provides the retail service. That ownership-and-operation split has a working precedent in the CitiPower, Powercor and United Energy pole-mounted charging trial in Victoria (noting that trial is network-funded rather than consumer-funded), and we regard it as a legitimate way to serve genuine gaps. In particular:

1. The program's safeguards are well constructed: a clear prohibition on distribution network service providers (DNSPs) selling electricity to drivers, so the CPO always retains the energy-sale role; the exclusion of commercially viable DC metropolitan charging from any direct DNSP role; and re-testing of site commerciality at program end. For metropolitan kerbside the program offers two designs — a CPO first right of refusal (Design 1), and a DNSP tender under which the winning CPO owns and operates the asset outright (Design 2). Both can preserve competition; in either case the key is that sites are identified on transparent criteria and the process is competitively neutral.
2. A consumer contribution to residual costs is appropriate in principle, given the program targets the uncommercial gap rather than serving existing EV users, the modelled bill impact is modest, and the emissions benefit is a common benefit — provided that site selection rigorously confines consumer-funded deployment to genuinely uncommercial locations.
3. An enhancement we think is currently undervalued is to formalise the role of local councils in site identification and delivery. The rule change request and recent independent research both point this way; the opportunity is to make it a defined step rather than a general expectation.

Our responses below focus on the questions where our operating and delivery experience adds something the Commission may not hear from network or consumer-advocacy submitters. We do not comment in detail on the regulatory-accounting mechanics, which are better addressed by network regulatory economists.

Responses to consultation questions

Question 1 — Problem statement

We agree with the problem statement.

From direct CPO operating experience, the chicken-and-egg dynamic in AC kerbside charging is real. Utilisation at early-market kerbside sites is generally too low to support unsubsidised commercial deployment at the scale and pace required, while drivers without off-street parking consistently cite charging access as a barrier to switching. The two reinforce each other, and the cycle does not break on its own at the current rate.

The market failure in regional and remote blackspots is also real and, if anything, more clear-cut. At the traffic volumes involved, the commercial case for fast charging does not exist, and coverage will not appear without intervention.

On DNSP-side friction, we agree that connection processes (timeframes and cost), site identification, and facility access fees are each genuine barriers to efficient deployment. The program's coordinated "program of works" connection model and

capped facility access fees are sensible, practical responses to friction CPOs encounter today.

One caution worth recording: the strength of the case rests on the gap being genuinely uncommercial. Independent analysis from UNSW (Sturmberg) of around 27,000 kerbside charging sessions found that some kerbside sites are already commercially viable, but that too few of them exist. The implication is that the binding constraint is coverage of the un-viable gap, not the viable core — which is consistent with the program's intent, and which makes disciplined site selection the critical success factor (see Question 4). The same research also points to materially stronger utilisation at well-located DC kerbside sites than at slow AC ones; the program's AC-kerbside focus is a reasonable fit for the residential, no-driveway cohort it targets, but charger-type performance is worth tracking through the program to inform the enduring market design.

Question 2 — Emissions reduction

We do not contest the emissions case. The link between charging availability and EV uptake is well established, and the program is targeted at the coverage gap most likely to be constraining uptake, so we regard the direction and order of magnitude of the emissions benefit as well-founded. We do not have an independent basis to assess the proponent's specific modelling methodology or assumptions, and defer to others on that detail.

Question 3 — Other benefits and insights for an enduring market design

Beyond emissions, the most durable benefit of the program is the site-identification data and the coordination learnings it will generate, and we support the requirement for DNSPs to publish suitable sites publicly even where they are not selected.

We encourage the Commission and DCCEE to treat the council layer as part of that enduring value. Most AC kerbside charging deployed in Australia to date has been government-funded and council-enabled. Councils control the kerb, the planning pathway, asset and streetscape considerations, and a large share of community acceptance. Site identification led by DNSPs will be materially stronger, and less likely to produce stranded or contested assets, where it draws on council kerbside strategies and local place knowledge. This is not a novel observation: the rule change request itself anticipates a role for councils alongside CPOs, recent UNSW research has recommended a greater council role, and the NSW kerbside program already funds both councils and charge point operators, with a significant share directed through councils. The opportunity is to convert that shared expectation into a defined step — we suggest the program guidelines require a DNSP's site-selection proposal to demonstrate engagement with any applicable council kerbside charging strategy before sites are submitted to DCCEE. The program would then leave behind not just a list of connected poles but a repeatable, council-integrated site-selection method the wider market can use after 2029.

Question 4 — Contributions from all electricity consumers

AJMG considers a consumer contribution appropriate in principle, for the reasons the proponent gives: the program is not serving the private interests of existing EV users, the emissions benefit is common to all consumers, the modelled peak bill impact is modest, and the 30/70 split mirrors arrangements already accepted in the regulatory framework.

That appropriateness rests on one condition: consumer funds should flow only to genuinely uncommercial sites. As noted under Question 1, independent evidence indicates viable kerbside sites already exist but are too few; the risk to guard against is consumer money subsidising sites the competitive market would have served, which would both waste consumer funds and distort competition.

We note a counter-argument from the same body of research: that a split model, in which competitive operators take the profitable sites and networks are left with the remainder, can raise long-run costs because profitable sites no longer cross-subsidise unprofitable ones. We take that concern seriously. Our view is that, for a time-bound program with a 30% grant offset and the competition safeguards described above, gap-targeted support is a reasonable way to secure early coverage without pre-committing the enduring market structure. The deeper question of whether kerbside is best treated as integrated public infrastructure is one of enduring market design, and is better resolved in Package 1 of the Electricity Network Regulation Review than pre-empted here.

To manage that risk and strengthen public confidence, we recommend two low-cost transparency measures:

- The commerciality-testing methodology used to qualify sites for consumer funding should be published and, ideally, independently reviewed before the program opens. It should rely on observable metrics — utilisation proxies, EV density, proximity to existing or planned commercial charging — rather than self-assessment alone, and should provide for independent review of borderline sites; and
- At program end, the program should report on the share of consumer-funded sites subsequently found commercially viable on re-testing, as a check on site-selection discipline.

With those guardrails, we consider the consumer contribution reasonable.

Question 8 — Alternative and complementary solutions

We do not propose an alternative to the rule mechanism. We suggest one complementary, low-cost enhancement: that DNSP site identification be required, or at least expressly encouraged, to draw on existing and emerging council kerbside charging strategies and local planning instruments. Many councils are now developing exactly this material. Connecting it to the program's site-identification step is a small coordination cost that should improve site quality, reduce planning and community

friction, and lower the risk of stranded assets that would otherwise fall back on consumers.

Question 9 — End of asset life

Where a DNSP has installed EV charging infrastructure as the provider of last resort, we favour re-testing commerciality and returning the site to the competitive market before any DNSP replacement of the asset. This keeps the long-term default as a competitive one and limits the duration of network ownership to the period of genuine market failure.

Question 10 — Enduring role of DNSPs (early view)

We note this is largely reserved for Package 1 of the Electricity Network Regulation Review, and we intend to engage there. As an early view: a provider-of-last-resort role for metropolitan kerbside, and a provider role for uncommercial regional blackspots, are both defensible where the competitive market will not serve — on two conditions. First, strict confinement to genuinely uncommercial situations, tested transparently. Second, a clear and durable separation between any network deployment role and the competitive energy-sale function, which the current program preserves well. We also encourage the Commission to ensure the end-of-program treatment of these assets is clear in the drafting, including how and when their commerciality is reassessed, so the program's time-bound intent is preserved in practice.

Questions 5, 6 and 7 — RAB adjustment, recovery timing, and classification

AJMG defers to network regulatory economists on the precise treatment of capex and opex in the regulatory asset base, the timing of cost recovery, and the service-classification and connection-services drafting. We support the underlying principle of mirroring the existing efficiency incentives — in particular the Capital Expenditure Sharing Scheme — so that consumers are protected against cost overruns, and we note the rule change request's own suggestion that the Commission consider an overall cap on recoverable overspend, which we support given the reduced scope for ex-post review.

Closing

AJMG supports the rule change as drafted, with the site-selection transparency measures and the council-integration enhancement set out above. We would be glad to provide further detail on any point, or council-side case material as it accumulates through current engagements.

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