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## **Consultation Paper – National Electricity Amendment (Facilitating Electric Vehicle Charging Infrastructure under Commonwealth Grants) Rule 2026**

Alinta Energy welcomes the opportunity to provide comment on the proposed rule change "*National Electricity Amendment (Facilitating Electric Vehicle Charging Infrastructure under Commonwealth Grants) Rule 2026*"

Alinta Energy, as an active investor in energy markets across Australia with an owned and contracted generation portfolio of nearly 3,000MW and more than 1.1 million electricity and gas customers has a strong interest in energy market design, including the appropriate boundary between regulated monopoly services and contestable market activities.

We do not support the proposed rule change to the extent it would allow Distribution Network Service Providers to recover public EV charging infrastructure costs through the regulated asset base. While the expansion of EV charging infrastructure is important, public charging is a contestable service and should be delivered through competitively neutral mechanisms. Recovering these costs through regulated revenues risks distorting competition, discouraging private investment and transferring commercial risk to electricity consumers.

Our detailed comments are provided in the following, should you have any questions or wish to discuss any aspect of our submission please contact Mr Shaun Ruddy, Manager National Retail Regulation on 0419 262 382 or via email: [shaun.ruddy@alintaenergy.com.au](mailto:shaun.ruddy@alintaenergy.com.au)

Yours Sincerely

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# **Response to Consultation Paper – National Electricity Amendment (Facilitating Electric Vehicle Charging Infrastructure under Commonwealth Grants) Rule 2026**

## **DNSP Participation and Recovery of Costs through the Regulated Asset Base Overview**

Alinta Energy does not support the proposed rule change to the extent that it would permit Distribution Network Service Providers (DNSPs) to participate in the delivery of public electric vehicle charging infrastructure funded through Commonwealth grants and subsequently recover associated costs through the regulated asset base (RAB).

The proposal risks undermining competitive neutrality, distorting investment signals, and transferring commercial risk from infrastructure proponents to electricity consumers.

While we support the objective of accelerating electric vehicle adoption and expanding charging infrastructure, these objectives should be pursued through competitive market mechanisms rather than through expansion of regulated monopoly activities.

### **Adverse Impact on Competition**

The National Electricity Market has historically distinguished between monopoly network services and contestable energy services. Public EV charging infrastructure is a contestable service that has attracted substantial investment from charge point operators, energy retailers, fleet providers and other private market participants.

Allowing DNSPs to participate in Commonwealth-funded charging infrastructure projects creates a significant risk that regulated businesses will enjoy competitive advantages unavailable to private sector providers. These advantages include:

- Access to regulated revenues and balance sheet support.
- Existing ownership and control of network assets.
- Established relationships with connection and planning processes.
- Access to customer and network information not available to competing market participants.
- Lower perceived financing risk due to monopoly status.

Even where DNSPs are not directly operating charging stations, the ability to develop infrastructure with the support of Commonwealth grants and subsequently recover costs through regulated revenues creates an uneven playing field.

Private charging operators must recover their investments through commercial utilisation of charging assets. DNSPs, by contrast, would have the ability to socialise costs across electricity consumers. This creates a material competitive distortion and may discourage future private investment.

## **Risk of Crowding Out Private Investment**

The proposed framework may reduce incentives for private entities to invest in charging infrastructure.

Investors are unlikely to commit capital where they face the prospect of competing against entities that can:

- recover costs through regulated network charges;
- rely on monopoly revenue streams;
- and transfer a significant portion of investment risk to consumers.

Over time, this may result in fewer private sector participants, reduced innovation, and less efficient infrastructure deployment.

The consultation paper identifies deployment barriers faced by EV charging providers. However, the existence of deployment barriers does not necessarily justify granting regulated entities a privileged position within a competitive market.

## **Recovery Through the Regulated Asset Base is Inappropriate**

We do not consider recovery of EV charging infrastructure costs through the RAB to be appropriate.

The RAB exists to support the efficient provision of monopoly network services. Public EV charging infrastructure is not a monopoly service. It is a contestable activity capable of being provided by multiple competing entities.

Allowing recovery through the RAB would result in:

- Electricity consumers bearing costs regardless of whether they use EV charging infrastructure.
- Transfer of commercial risk from investors to consumers.
- Potential cross-subsidisation of a specific class of infrastructure users.
- Weakening of cost-reflective investment signals.

The proposal therefore risks departing from the long-standing regulatory principle that users of contestable services should bear the costs of those services.

## **Consumer Impact**

A particular concern is that the proposed framework would require all network customers to contribute to infrastructure that may primarily benefit a subset of consumers.

While EV uptake is expected to increase over time, many consumers currently do not own electric vehicles and may not directly benefit from public charging infrastructure. Requiring these consumers to fund charging infrastructure through network charges raises significant equity concerns.

Consumers already face substantial cost-of-living pressures and increasing network charges. Additional recovery of EV charging infrastructure costs through regulated revenues should not occur unless there is clear evidence of overwhelming net market benefits and no less distortive alternative.

### **Alternative Approaches**

If governments wish to accelerate EV charging deployment, more appropriate mechanisms include:

- Competitive grant funding directly to charge point operators.
- Open tender processes that preserve competitive neutrality.
- Targeted support for connection costs without asset socialisation.
- Streamlined connection and planning processes.
- Regulatory reforms that reduce deployment barriers for all market participants.

These approaches can support infrastructure rollout while preserving competition and avoiding unnecessary expansion of regulated monopoly activities.

### **Conclusion**

The proposed rule risks blurring the distinction between monopoly network services and contestable market activities. Allowing DNSPs to participate in Commonwealth-funded EV charging projects while recovering costs through the RAB would create competitive distortions, discourage private investment and transfer commercial risk to consumers.

For these reasons, we submit that:

1. DNSP participation in public EV charging infrastructure should remain strictly limited and subject to strong ring-fencing protections.
2. Public EV charging infrastructure should continue to be treated as a contestable service.
3. Costs associated with EV charging infrastructure should not be recoverable through the regulated asset base.
4. Any Commonwealth funding should be allocated through competitively neutral mechanisms that do not advantage regulated network businesses over private sector providers.