



25 June 2026

**Submission to:**

Australian Energy Market Commission

National Electricity Amendment (Facilitating EV charging infrastructure rollout under Commonwealth Grants) Rule 2026

Project reference code ERC0436

## Introduction

The Australian Electric Vehicle Association (AEVA) is the national organisation representing Australian electric vehicle (EV) drivers and consumers, with over 2,500 members across all States and Territories. AEVA is a volunteer-run, independent not-for-profit organisation and is the oldest continuously running electric vehicle association in the world, having been formed in 1973 during the first gulf oil shock.

AEVA has no commercial interest in the proposed rule changes and the views expressed reflect what we believe are in the best interests of our members, based on our annual member survey results, and are consistent with our goal of electrifying transport in Australia as quickly as possible.

AEVA's policy statement on charging infrastructure can be found at this link:

<https://www.aeva.asn.au/files/4955/>. On behalf of the AEVA's Policy Advocacy Working Group, and with endorsement from our national president, we make the following submission.

## Submission Responses

### QUESTION 1: PROBLEM STATEMENT

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

1. Do you consider there is a "chicken and egg" problem in deploying AC kerbside EV charging infrastructure?
2. Do you agree that there is a market failure for deployment of EV charging in regional and remote blackspots?
3. Do you consider the following DNSP processes and prices to be barriers to efficient EVCI deployment:
  - a. connection processes, including timeframes and costs?
  - b. site identification processes?
  - c. facility access fees?

### Responses

1. AEVA does not agree that there is a "chicken and egg" problem. The surge in EV sales to just under 20% of new car sales in May 2026 with an exponential rise year-on-year indicates that the technology adoption curve has moved from "early adopters" to "early majority". This has occurred despite an alleged shortfall in public chargers.

Our data indicates that the main driver for EV uptake is financial, essentially to save on fuel costs by paying cheaper home electricity prices or using rooftop solar. There is little



evidence that a surge in the number of chargers in inner urban or remote regional areas will somehow directly cause the increase in EV uptake predicted in the submission paper.

AEVA data also indicates that 80% of our members charge at home, and that members only occasionally report charging difficulties in regional areas. Fast charging on major highways has significantly improved in recent years. Further, many regional accommodation providers now offer EV charging to guests, and this does not require any special or expensive infrastructure. In short, lack of chargers and “range anxiety” is largely a fear held by non-EV owners, which disappears once a consumer adapts to EV usage and realises that charging options are varied and widely available. This may change as EV numbers increase, but AEVA believes that the current competitive arrangements between CPOs and the involvement of local communities and Local Government councils in charger placement and parking will result in the best outcomes for EV drivers and communities, and the long-term commercial viability of CPOs.

AEVA notes that the National Energy Objectives include price. The cheapest way to charge will always be from “behind the meter” rather than commercial kerbside pole charging. There is a fundamental inequity in pushing those without off street parking and charging to more expensive options, rather than supporting more varied home charging options including gully charging<sup>1</sup> and charging within strata-managed buildings and locations.

AEVA does support continued expansion in public EV charging infrastructure. However, AEVA is not automatically pushing for any and all opportunities to deploy EV chargers in the short-term. We feel that it is necessary to take a longer-term, sustainable view of the charging ecosystem, for the benefit of both consumers and competitive businesses supporting EV adoption, based on effective community and local stakeholder engagement. Allowing regulated monopoly distribution network service providers (DNSPs) to select sites for a large number of urban chargers without Local Government involvement will not necessarily lead to better charger access and is likely to result in inefficient underutilisation of many, while increasing the DNSP asset base at a cost to all energy consumers.

2. No. Simply because certain areas currently do not currently support profitable charging infrastructure **is not** evidence of market failure. The proposal does not include any evidence of specific features of market failure within a conventional economic framework, such as clear externalities which cannot be priced, or excessive market power. We recommend avoiding this terminology as it is unhelpful.

It is true that to date, some regional charging infrastructure has been dependent on specific state and federal grants in the absence of commercial incentives. This continues to be largely successful, although the need for more regional chargers will increase as EV uptake progresses, especially around peak travel times. AEVA members report that ‘charger anxiety’ can be a feature of regional travel, related primarily to existing chargers being busy or malfunctioning. We cannot comment on the relative economic efficiency of DNSPs installing regional chargers and including them in their regulated asset base vs grants. If the former, we would urge that the DNSPs must be held to the standards outlined in the AEVA policy statement, particularly around charger downtime.

3. This question is best answered by Charge Point Operators.

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<sup>1</sup> We note that while household owned gully charging can often be technically feasible, it may not be effective where there is intense competition for on-street parking.



## QUESTION 2: EMISSIONS REDUCTION

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

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

### Response

Using International Energy Agency (IEA) data of an average of 30 EVs per charger in Canada and USA and multiplying this by the expected number of new chargers created by this program to come up with a figure of 423,000 new EVs *is not a valid method*. As stated in the previous section, financial motivations are the main driver of EV uptake. It is possible that a growing shortage of available chargers might slow uptake somewhat, but it is implausible to assume that each new charger will somehow automatically generate thirty new EVs. There are much more effective and efficient ways for Government to increase EV uptake, including for example direct financial incentives, better roadside signage of chargers, deferring any future road user charges, and countering the widespread EV misinformation that continues to be promoted by vested interests on social media and other sources.

## 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?

### Response

We agree that the program does have the potential to better service regional absolute "black spots" in the short term, but this needs to be weighed against the impact on competition and CPO industry viability in the longer-term. There is a risk that DNSPs have an incentive to designate more sites as "black spots" to maximise growth in their revenue base.

We agree that improved transparency around the processes between DNSPs and CPOs in designing, cooperating and deploying charging sites, and capping access fees, are likely to be beneficial.

## 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 CPOs are willing to pay funded through a combination of government funding and contributions from all electricity consumers?

### Response

No. See responses above, and AEVA policy statement on charging. We do not view it as appropriate at this time for EV charging infrastructure that could potentially be provided by private-sector operators and paid for through normal user pricing to be funded by all electricity consumers through regulated monopoly pricing.

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

See responses above. As a general matter, AEVA does not support extending the DNSP regulated monopoly RAB to cover EV charging infrastructure unless it can be demonstrated that there is unmet demand for which no economically viable alternatives exist.

#### **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?

**See responses above.**

#### **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?
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?

AEVA believes that the restricted asset provisions **should apply** in this instance.

#### **QUESTION 8: ALTERNATIVE SOLUTIONS**

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

**No response.**

#### **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)?

##### **Response**

At the end of a charge points service life, other potential operators should be permitted to access the site through a competitive tender process. The electrical hardware and local network capacity should not be wasted.

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

### Response

As noted in our responses above, AEVA members usually charge at home and are generally satisfied with their access to public charging infrastructure when they need to charge out of home. An exception is strata managed property residents; AEVA is closely involved in policy initiatives to ensure strata buildings and their rules can accommodate installation of EV chargers for residents.

With EV adoption now growing strongly, AEVA's view is that it is too early to determine whether "last resort" charging infrastructure is needed, in either urban or regional blackspots. If site access and connection processes are improved, private-sector operators may step in to provide much of the additional charging infrastructure.

Current arrangements (including grants, subsidies and local government involvement) should be comprehensively assessed considering the current accelerated EV adoption rate, before embarking on a process that potentially locks in charging infrastructure within regulated monopoly providers and thereby undermines the development of a commercially viable CPO industry.

The main reason a prospective metropolitan charge point might be unattractive to a CPO is underutilisation, and therefore not yet a financially viable site. If a DNSP installs the charger, this only marginally improves charger access, but the DNSP benefits by adding it to the RAB.

The situation is somewhat different in regional areas; see comments in response to question 1.

Thank you for the opportunity to respond to your Rule Change consultation.

Yours sincerely



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