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14th July 2026

bp Australia welcomes the opportunity to provide feedback to the AEMC on the Department of Climate Change, Energy, the Environment and Water's (the Department) rule change request to enable its 'Accelerating Electric Vehicle Charging Program' (the Program).

bp has more than a decade of global experience in delivering EV charging infrastructure and experience as a Charge Point Operator (CPO) across countries including the UK, China, Germany, USA, India, Spain, Portugal and New Zealand. In Australia, bp has been operating a rapid and ultrafast public charging network since 2022 and now operates over 320 charging bays.

bp's position on the role of Distributed Network Service Providers (DNSPs) in the deployment of public EV charging infrastructure

bp believes that DNSPs should focus on their core responsibility of managing and upgrading the electricity grid to support current and future demand. The bottleneck in Australia's EV charging infrastructure is timely and economic grid connections at the charge point not a lack of urgency rolling out charging options.

bp does not support the removal of the ring fence provision preventing DNSPs from providing electric vehicle charging services because doing so threatens to undermine the integrity of the existing market. DNSPs can use their monopoly distribution service business to subsidise their charging operations in competition with CPOs, who must attract, deploy efficiently, and recoup a return on capital via their EV charging business.

bp believes DNSPs are likely to optimise their capital investment by deploying EV charge points where power is most available on their own network – key strategic information which CPOs must pay significant fees to access. This would further distort the market and disadvantage CPOs.

bp believes the cost of EV charging infrastructure should be borne by the direct benefit recipient in the form of payment for services, just as the driver of a car pays for the fuel in their tank. There is an equity question when households who do not own electric vehicles are subsiding the installation and operation of charging infrastructure, via the DNSP's Regulated Asset Base (RAB).

bp's overseas experiences says customers prefer a convenient, fast charging experience. Street post charging with Level 1/2 AC charging speed may seem attractive but the slow charging times result in either 'blocked' streetscapes impacting customer traffic at local shops, or idle charging infrastructure as drivers avoid slow charging experiences. We believe the most efficient form of public EV charging is via rapid (50kW+) and ultra-fast (150kW+) charging units located in dedicated hubs such as parking centres, existing fuel retail sites and destination points of interest. Fewer rapid and ultra-fast charging units in dedicated off-street spaces can service more EVs, more conveniently, more efficiently, and with less impact on local businesses.

bp's recommendations on improvements for the Department's Program

Guardrails to manage DNSP applications and minimize misallocation of investment: Because the DNSPs can recover costs through its regulated asset base regardless of utilisation, there is no direct financial incentive to ensure sites are well-located, reliable, or valuable to EV drivers. This could lead to under-utilised charging infrastructure and unnecessary higher electricity bills. Program guidelines should be written to ensure DNSPs choose charging locations that are economically net positive.

Ensure EVCI mapping tool is inclusive of HV connections for DC charging: The department has indicated the EVCI mapping tool will add functionality to provide information on power availability across the grid for low voltage network (LV), for AC charging. Given the customer demand for high-speed DC charging, the EVCI mapping tool should also map availability in the high voltage network (HV).

Open funding applications to CPOs as well as DNSPs: The program should be open to operators with a track record and capability to deploy quality fast charging infrastructure at scale and pace, whilst meeting minimum requirements. The NSW Fast Charging program has funded 184 charging stations to date and represents best practice grant design because it is open to any organisation that meets eligibility requirements.

Show objective with supporting evidence: The Department references a September 2025 report *Behavioural barriers and enablers of electric vehicle* by the Behavioural Economics Team of the Australian Government as influencing the department's intent for the program. This report should be made public and the department provide clear objectives for the program. Beyond BETA's survey of 3700 people there should be evidence that the communities in proposed locations will benefit from this type of infrastructure.