

23 July 2026

Our Ref: X094989

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Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000
aemc@aemc.gov.au
[submitted via: <https://www.aemc.gov.au/contact-us/lodge-submission>]

Dear Sir/Madam,

City of Sydney Submission to AEMC ERC0437 'Enabling distribution network service provider led electric vehicle charging infrastructure'

The City of Sydney (the 'City') thanks the AEMC for the opportunity to provide a submission into the rule change put forward by Electricity Network Australia (ENA).

The City's target is to have net zero emissions across our local area by 2035. Our community strongly supports a city for walking, cycling and public transport supported by the electrification of vehicle fleets (private, public and commercial) and the greening of the electricity grid.

Our [Electrification of Transport in the City Strategy and Action Plan](#), outlines the City's overall approach to electric vehicle charging options, including a focus on electrifying fleets which affect the most on people in our area, such as commercial, public transport and point-to-point vehicles, and supporting private electric vehicle (EV) charging in ways that protect the public realm.

The City made a recent submission to a related rule change request put forward by the Department of Climate Change, Energy, the Environment and Water (ERC0436). For ease we have reattached that submission to this letter.

Recommendations for rule change ERC0437

1. DNSPs should only be able to install electric vehicle charging on their assets when supported by the relevant local government / land authority.
2. The impacts to local government should be cost neutral.

We reiterate that rule changes or programs that result in a proliferation of kerbside EVCI located at undedicated parking spaces in areas with high kerbside use, such as ours, could undermine local government approaches to EV charging and community support for these. It could also result in EV charging that is not readily usable without dedicated parking, resulting in undue pressure on local government to convert kerbside that is in existing use to dedicated EV charging in locations they do not support.

The reallocation of parking for kerbside EVCI requires local government approval and support. Local governments are best placed to understand the balance of kerbside considerations necessary to support dedicated on-street spaces for EV charging.

Current NSW Government programs have enabled the City to have a formal concurrence role for kerbside charging proposals (please see attachment for more information). This has allowed us to consider the public domain, kerbside use, road safety, and especially the available public charging and private charging opportunities (residences and businesses with off-street parking) at a fine-grained level.

In NSW, Section 138 of the Roads Act 1993 requires consent from the relevant roads authority for works on a public road, including erecting structures, disturbing surfaces, or interfering with road features. Installing an EV charging unit in the road reserve, including footpaths, will require consent.

As articulated in our prior submission, it is unclear why electricity consumers who are not using the EVCI service should be expected to make up any shortfall in funding, particularly since CPOs are a private business. Fees for charging should be set to cover capital and operating costs.

3. DNSPs should not be able to use the EVCI as advertising and

4. DNSPs should be pursuing public charging off-street, working with large retail and service stations.

If the rule change is approved, it should be clear that DNSP's should not be able to use the EVCI for advertising. Advertising in the public realm should go through normal approval processes.

Most public and private charging facilities should be located off-street, to minimise the impact on the public domain, and to provide charging where most people park their vehicles. Fast charging in shopping centres and other large retail centres can drive broader uptake. DNSPs can assist this by working with large retail centres, service stations and the like to undertake the required infrastructure changes.

If you would like to discuss any of the issues raised in this submission please contact Peter Warrington, Manager Transport Policy, at 9265 9128 or PWarrington@cityofsydney.nsw.gov.au.



Kim Woodbury

Chief Operating Officer

Attachment

2026/357943 City of Sydney submission. AEMC rule change ERC0436 June 2026

24 June 2026

Our Ref: X094989

File No: 2026/357943

Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000
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[submitted via: <https://www.aemc.gov.au/contact-us/lodge-submission>]

Dear Sir/Madam,

**City of Sydney Submission to AEMC on ERC0436 National Electricity Amendment
(Facilitating electric vehicle charging infrastructure under Commonwealth grants)
Rule 2026**

The City of Sydney (the 'City') thanks the AEMC for the opportunity to provide a submission into the rule change put forward by the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

The City's target is to have net zero emissions across our local area by 2035. Our community strongly supports a city for walking, cycling and public transport supported by the electrification of vehicle fleets (private, public and commercial) and the greening of the electricity grid.

Our [Electrification of Transport in the City Strategy and Action Plan](#), outlines the City's overall approach to electric vehicle charging options, including a focus on electrifying fleets which affect the most on people in our area, such as commercial, public transport and point-to-point vehicles, and supporting private electric vehicle (EV) charging in ways that protect the public realm.

The AEMC must assess the rule change application from DCCEEW in line with the National Electricity Objective: *"to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers of electricity with respect to:*

- *price, quality, safety, reliability and security of supply of electricity; and [...]*
- *the achievement of targets set by a participating jurisdiction —*
 - *for reducing Australia's greenhouse gas emissions; or*
 - *that are likely to contribute to reducing Australia's greenhouse gas emissions."*

We appreciate that the rule change request received from DCCEEW to facilitate EV charging infrastructure rollout under Commonwealth grants is time and scale limited to electric vehicle charging infrastructure (EVCI) supported by the program, which would conclude on 30 June 2029. The rule change request is specifically focused on enabling the funding program and therefore does not address or apply to EV charging infrastructure rollout more broadly.

Taking this into account, the City makes the following comments in response the AEMC's evaluation question areas, noting that *the direct involvement of local government by DCCEEW is related to program design however it has a direct impact on the outcomes of the program*, and therefore elements of program design need to be considered by the AEMC when making their assessment.

Summary of City position

We do not oppose the program, if it includes partnership with local governments, including local government concurrence on appropriate locations for kerbside EVCI.

If the program results in a proliferation of kerbside EVCI located at undedicated parking spaces, it could undermine our trial and broader strategy, community support and result in undue pressure on local government to convert kerbside that is in existing use to dedicated EV charging in locations they do not support.

On balance the limited benefit from a slightly more rapid or efficient roll out of public charging on-street in dense urban areas, such as ours, is likely to be outweighed by the loss of community confidence and the disruption to other kerbside needs.

Kerbs in our area are already allocated to existing uses. They are well used. The reallocation of parking for kerbside EVCI requires local government approval and support. Local government are best placed to understand the balance of kerbside considerations necessary to support dedicated on-street spaces for EV charging .

The City has been working with Ausgrid and Charge Point Operators (CPOs) to install a limited amount of pole-based kerbside EVCI on our streets, in response to an action in our Strategy and Action Plan.

These initiatives have been possible under current system rules, and with funding from the NSW Government.

The City had a formal concurrence role for each charger proposal in these competitive grant programs. This has allowed us to consider the public domain, kerbside use, road safety, and especially the available public charging and private charging opportunities (residences and businesses with off-street parking) at a fine-grained level.

Constraints to pole-based charging exist, including (a) extensive undergrounding of poles and wires in some suburbs; and (b) structural and supply limits to the number of poles that can support charging, along with the location specific public domain and community considerations (discussed below). Without dedicated parking, only possible with local government support, kerbside chargers in our area will have limited use.

It is not clear whether the program, as designed, will result in EVCI that is appropriately located and usable for consumers, whether it will undermine existing EVCI programs, including market-driven scalable publicly accessible off-street EV charging in existing service stations, commercial car parks and retail/shopping centre car parks, or whether it will just flood areas with 'visible' but not usable chargers undermining emission reductions and community support for EVCI. If it is the latter, it will then place undue pressure on local governments to convert existing and used parking to dedicated parking for EV charging in locations they may or may not support, and causing community disruption and impact on other existing kerbside uses, with local government held responsible.

These points are expanded on below.

Benefits of the program.

DNSPs should only be able to install electric vehicle charging on their assets when supported by the relevant local government / land authority. The impacts to local government should be cost neutral.

The support and involvement of local government is related to the effectiveness of the program.

The City has worked with electricity provider Ausgrid and CPO's EVX and PlusES to conduct a trial of low-impact public on-street charging. This includes a series of EV chargers funded by the NSW Government's Kerbside Charging Grants, following the City's concurrence with the EVX/Plus ES grant application.

The City's roles in this trial have been influencing CPO proposals and grant applications, engaging with the community about proposals and dedicating relevant parking spaces for EV charging only.

The trial is generally supported by our community. The role of local government in this process is important.

Without local government's support, particularly in engagement and dedicating parking (kerbside changes), it is likely to undermine community support for an incremental approach to providing on-street charging and will create unsustainable pressure for councils to dedicate nearby spaces for charging.

Local government has an important role in assessing and understanding the localised impact of EV chargers, including:

- for accessibility (width of the footpath, location of a charging cable),
- impact to adjacent land use / property owners
- relative availability of other public charging opportunities
- relative availability of off-street parking for residents (where they can charge at home).

Dedicated parking supports access to EV charging in streets with many kerbside uses and enables local government to manage any impacts from converting spaces.

Without the parking provision, installing EV charging on poles is an inefficient investment and will unlikely make a significant contribution to facilitating EV charging for residents, businesses or visitors, limiting its carbon reduction potential and resulting potentially in underutilised assets.

If most of the EVCI is to be on kerbs without dedicated parking bays, in urban areas, the benefits of the program from emissions reduction are unlikely to outweigh the costs to electricity consumers.

The emissions reductions are likely to be negligible for urban areas as the emissions reduction will be only the marginal difference by consumers who bring forward a decision to buy an EV because of the EVCI provided because of this program (i.e. DNSP provided EVCI without a CPO). This needs to be compared to current implementation of EVCI (fast and slow kerbside and off-street charging) and the increasingly rapid uptake of EVs that is currently occurring.

Slow kerbside charging does contribute to this, but it is less likely to have a significant impact on uptake and emissions compared to other factors leading to increased uptake of EVs. It is unlikely to support the transition of key urban fleets, such as taxis and rideshare, and service and loading.

The emissions reductions will be increased if charging occurs in the middle of the day when the grid is at its most renewable levels.

Further emissions savings result if the systems installed are V2G enabled, with the incentives in place that encourage charging during non-peak times and discharging during peak times.

Furthermore, as the primary road owner and parking enforcement body, local governments are most likely to receive the feedback from users unable to access charging infrastructure. This feedback is shared with the service provider, however,

there should be robust guidance framework to ensure the EVCI owner is responsible for addressing and responding to user feedback.

DNSPs should only be able to install electric vehicle charging on their assets when supported by the relevant local government / land authority. The impacts to local government should be cost neutral.

Outcomes for consumers (cost to consumers)

DNSP's should not be able to use the EVCI for advertising. Advertising in the public realm should go through normal approval processes.

It is unclear why electricity consumers who are not using the EVCI service should be expected to make up any shortfall in funding, particularly since CPOs are a private business, operating (presumably) for profit, and are charging a fee to those using the service, and especially, if they are also the recipient with the government grant.

The fee for charging should be set to cover capital and operating costs.

A case could be made to share some upfront costs across network customers if it could be demonstrated by a DNSP to result in greater savings, in the short term, by resulting in better utilisation of the network, that will avoid or defer the need for BAU network investments. This isn't clear in the application. To determine this, the AEMC would need to be satisfied that the modelling is sufficient to demonstrate that the EV charging would predominantly occur during non-peak times. The DNSP would need cost rates and/or other incentives to encourage more charging during the middle of the day when electricity is cleaner, and vice-versa, with higher costs to disincentivise charging during the afternoon and early evening peak times.

If the rule change is approved, it should be clear that DNSP's should not be able to use the EVCI for advertising. Advertising in the public realm should go through normal approval processes. While this is part of program design, the scope for this to occur if the rule change is progressed needs to be considered. This would have long term negative public realm outcomes, diminishing benefits of the program to consumers.

Principles of market efficiency and alternative options

A framework for market-driven scalable publicly accessible off-street EV charging solutions is needed. This should address fast charging, existing service stations, commercial car parks and retail/shopping centre car parks. More solutions are needed to assist people in existing apartment buildings to charge their vehicles, but the infrastructure requirements, impacts and costs are unlikely to make publicly accessible on-street (kerbside) charging, with and without dedicated parking, usable, feasible or scalable in our area.

The City's adopted Strategy and Action Plan recognise that providing on-street refuelling ('charging facilities') for one type of private vehicle is not equitable, especially considering current affordability issues and the space constraints of urban streets.

Most vehicles refuel now at publicly accessible off-street service stations, not on public streets.

The DCCEEW program aims to support people in apartments to charge their electric vehicles, but the proposed approach is not scalable in our area.

The best place for many people to charge is where they currently park their vehicle, such as at home in garage or a driveway, at work, or where they currently refuel, service stations. People want to charge at home or at work while their car is parked because it is easy and relatively inexpensive, and their car is parked for a duration of time.

Other charging options, such as fast chargers in off-street locations or slower kerbside chargers, are needed where people do not have easy access to parking at home or at work, or for while they are undertaking other activities.

Most people in our area will only need to recharge their vehicle every few weeks.

The City's adopted position is that, in its area, the vast majority of public and private charging facilities should be located off-street, to minimise the impact on the public domain, and to provide charging where most people park their vehicles.

Locating slow kerbside chargers in locations where people can readily charge at home or in locations that really should have fast chargers is inefficient use of resources.

Kerbside chargers should only be installed in areas without viable alternatives, hence why the rule change needs to make it a condition for DNSPs / CPOs to identify suitable locations with local governments.

The City has undertaken extensive research that highlighted the complexities of strata governance and noted that while there is opportunity for significant emissions reduction with increased uptake of EV charging and electrification of apartment buildings accessing renewable energy, there are significant barriers to retrofitting EV charging in existing buildings.

In our area there are around 2,200 strata buildings (a mix of ages and a mix of availability of on-site parking). Many of these buildings are located in areas without DNSP poles.

The City has planning controls for 'EV-ready' new buildings, but this does not address the significant stock of existing apartments, many governed by strata.

Installing EV charging infrastructure in existing buildings requires multi stakeholder decision making by owners corporations, consideration of energy load, technical feasibility and safety, and insurance implications. For the buildings without the possibility of charging on-site, the option of charging on-street for some residents may be useful but comes with other considerations such as the time and location required to charge (and ability to park their vehicle at the charger). The infrastructure requirements, impacts and costs are unlikely to make publicly accessible on-street charging, with or without dedicated parking, usable, feasible or scalable in our area.

There has already been significant NSW Government support for introducing public electric vehicle charging across Sydney, especially targeting residential areas.

The City's view is there should be an increased emphasis on faster, commercial, off-street public charging and support for owners corporation to safely and equitably upgrade electrical infrastructure in strata buildings to allow apartment residents to charge at home. This type of charging will be crucial in securing electric vehicle uptake in fleets such as delivery and servicing, car sharing and point-to-point vehicles (which in dense urban areas have a large impact particularly for emissions reduction) along with private vehicles of people that live in strata and would likely drive broader uptake.

Access to fast charging provides confidence to drivers who require incidental or top-up charging and are unable to rely solely on slow charging. Electricity network providers can assist this transition by working with large retail centres and service centres to undertake the required infrastructure changes.

The City notes that there is limited provision of electric vehicle charging in inner city service stations to date, and also the success of some major fossil fuel corporations (and service station operators) in securing funding for electric vehicle charging facilities not on their land.

A framework for market-driven scalable publicly accessible off-street EV charging solutions is needed. This should address fast charging, existing service stations, commercial car parks and retail/shopping centre car parks.

If you would like to discuss any of the issues raised in this submission please contact Peter Warrington, A/Executive Manager, City Access and Transport at 9265 9128 or PWarrington@cityofsydney.nsw.gov.au.

A handwritten signature in blue ink, consisting of a stylized 'K' followed by a horizontal line.

Kim Woodbury

Chief Operating Officer