Connected Kerb

Submission to the Australian Energy Market Commission

National Electricity Amendment (facilitating electric vehicle charging infrastructure under Commonwealth grants) Rule 2026

Jonathon Clark
Director Connected Kerb (Aust) Pty Ltd
Location: Melbourne Australia Web:
www.connectedkerb.com
Email: jonathon.clark@connectedkerb.com
Phone: +61 408799560

Executive Summary

Connected Kerb's position is straightforward:

- We support the proposed Commonwealth grant program and the accelerated deployment of public EV charging infrastructure.
- We believe the program should proceed immediately, be delivered as a DNSP led deployment, and be structured as an obligation rather than an elective program , certainty of delivery is the critical missing element in the current design.
- We believe Type 9 metering fundamentally changes the economics of public AC kerbside charging by separating infrastructure ownership from market competition.
- We believe integrating public AC kerbside charging into the electricity market has the potential to deliver substantially better long-term consumer outcomes than a separate charging market sitting between consumers and the electricity system.
- We believe the proposed first right of refusal for Charge Point Operators risks foreclosing that opportunity before the long-term consumer outcome has been properly tested.
  We believe every DNSP should be subject to a minimum deployment obligation proportionate to EV uptake , and a cap preventing over deployment. This cap and collar framework is a delivery obligation, not a planning threshold.
- We believe an appropriate utilisation incentive framework must accompany deployment to ensure infrastructure is located, utilised and optimised effectively. The cost of relocating underperforming assets should not be recoverable through the regulated asset base.

Section 1 – The Long Term Consumer Outcome

Connected Kerb supports the reforms recommended by DCCEEW and supports the proposed Commonwealth grant program. The program will accelerate the deployment of public EV charging infrastructure, support EV adoption and contribute to Australia's emissions reduction objectives.

Connected Kerb's principal recommendation is that the program proceed as a DNSP-led deployment, that the proposed first right of refusal for Charge Point Operators not be adopted and that public AC charging infrastructure be operated using Type 9 metering.

Connected Kerb considers that public AC kerbside charging is fundamentally an electricity service rather than a charging service. Integrating charging infrastructure into the electricity system will deliver significant consumer benefits because it allows consumers to access the full benefits of competition, electricity market innovation and future pricing innovation across their entire household electricity relationship, including EV charging.

The proposed recommendations create a pathway towards two different long-term outcomes. The first integrates public AC kerbside charging into the electricity market, an industry that derives value from EV adoption. The second creates a separate charging market sitting between consumers and the electricity market, an industry that can only derive value from individual charging transactions.

The commercial reality and scale of this distinction appears to be widely understood within the industry but is rarely stated directly. If one model must recover its costs from charging transactions and the other can recover value from EV adoption across the broader electricity relationship, the consumer outcome is not the same. It is substantially different.

This difference flows directly from the economics of each model. Kerbside AC charging is an important service that supports EV adoption, but it represents only a small proportion of total charging events, typically between 5% and 10%. Public AC charging commonly operates at utilisation rates of 7.5% to 15% per charger and remains heavily dependent on government grant funding, typically requiring grants of between 30% and 80% of capital costs, generally towards the upper end of that range. Despite this support, consumer pricing at public AC chargers is commonly between 1.5 and 2.5 times prevailing household electricity prices.

Meanwhile, the electricity industry captures value from 100% of charging events, the overwhelming majority of which occur at home, at work or in other private settings.

This asymmetry is important. The economic benefit created by EV adoption flows throughout the electricity system. A Charge Point Operator, in contrast, can only access the small proportion of that value represented by charging transactions occurring at its assets. If DNSPs owned and amortised kerbside charging assets across their regulated asset base, as they do with other electricity infrastructure, the cost to the end user would fall substantially and approach household electricity pricing.
Historically, the principal objection to this model has been that DNSP ownership could reduce retail competition by creating a monopoly at the point of consumer interaction. However, the same concern can arise where a separate charging layer sits between the consumer and the electricity market.

Connected Kerb considers that Type 9 metering materially changes this assessment. By enabling multiple

participants , including retailers (FRMPs), EMSPs, Charge Point Operators and others , to settle energy through a single metering point, Type 9 efficiently separates infrastructure ownership from the retail relationship. The DNSP can own the regulated infrastructure while consumers retain the ability to choose and change retailers wherever they interact with the electricity market. This ensures retail competition while removing the principal regulatory objection to network-led ownership of public AC charging infrastructure.

Connected Kerb strongly believes that integrating public AC kerbside charging into the electricity market has the potential to deliver significantly greater long-term consumer benefit than a model that relies on a separate charging layer sitting between consumers and the electricity market. DNSP deployment combined with Type 9 metering addresses both the grant dependency and consumer pricing economics of kerbside charging while preserving and strengthening an ongoing competitive market .

This submission does not propose that existing CPO investments be disrupted. It is directed at the prospective deployment of new infrastructure and the market structure that should govern the next wave of public AC charging.

Connected Kerb is concerned that the DCCEEW recommended two-tier approach, including a first right of refusal for Charge Point Operators, risks delayed deployment, consumer confusion, inconsistent pricing outcomes and the premature establishment of charging arrangements that may not represent the most efficient long-term outcome. The risk of premature establishment is not simply a question of suboptimal outcomes at the margin. It is a structural risk. Once a separate charging layer is established at scale , with assets deployed, commercial arrangements in place, and consumer expectations set around a transaction-based pricing model , the regulatory and commercial cost of transitioning to an electricity market-integrated model increases substantially. Network infrastructure can be redeployed or reclassified. Commercial arrangements between CPOs, site owners and local governments are considerably harder to unwind. The AEMC will be familiar with the difficulty of correcting market structures once incumbent interests are established.

Connected Kerb submits that the proposed first right of refusal for Charge Point Operators creates precisely that risk. For this reason, Connected Kerb considers that the proposed program should proceed as a DNSP-led deployment, supported by Type 9 metering, and be implemented in a manner that preserves the opportunity to realise the substantial long-term consumer benefits available through integration with the electricity market.

Section 2 – Connected Kerb's Perspective on EV Charging

Connected Kerb is a CPO and one of the largest operators of kerbside EV charging infrastructure in the United Kingdom operating across multiple parts of the EV charging value chain, including charging infrastructure ownership, charging network operation and the sale of electricity to consumers.

Connected Kerb Australia has spent the past two years working with electricity networks, retailers, metering providers, software providers and regulators to understand how EV charging can be integrated into Australian electricity market arrangements.

Connected Kerb views EV charging as a collection of distinct use cases rather than a single market. Different charging applications create value in different ways and justify different commercial structures.

- Rapid and ultra-rapid charging create value through speed and convenience. In these circumstances, consumers are purchasing a premium service and may reasonably expect to pay a premium price.
- Other charging environments involve groups of vehicles with predictable behaviour patterns, predictable dwell times and known charging windows. These environments may include corporate fleets, workplace parking, commuter parking, transport interchanges, airport parking and similar locations where vehicles are regularly present for extended periods.In these environments, value can be created through energy optimisation. Known behaviour allows charging to be managed around electricity price signals, network conditions and available dwell time. This creates opportunities for providers to compete by delivering lower energy costs, improved charging outcomes and other energy-related services.

Connected Kerb expects competition and innovation to continue to develop strongly across these charging applications. Connected Kerb is itself a Charge Point Operator and recognises that increased EV adoption benefits the entire charging ecosystem. More electric vehicles create more charging demand, more opportunities for innovation and more opportunities for charging providers to compete and create value.

For this reason, Connected Kerb strongly supports the rapid deployment of public kerbside charging infrastructure and recognises the important role it plays in supporting EV adoption. Connected Kerb's interest is not simply in deployment , it is in deployment that delivers genuine and lasting consumer benefit.

Public kerbside AC charging serves a different role to many other charging applications. Its primary purpose is to provide access to electricity where vehicles are already parked, particularly for consumers who do not have access to off-street charging. Unlike workplace parking, commuter parking, fleet environments and other managed charging applications, consumer behaviour is generally unknown and difficult to predict. There is limited opportunity to optimise charging around known dwell times, predictable departure times or coordinated vehicle behaviour. As a result, there is less opportunity to create value through energy optimisation or managed charging services. In these circumstances, the consumer is not primarily purchasing speed, convenience or a managed energy service. The consumer is purchasing access to electricity.

Connected Kerb considers this distinction important because different charging applications may justify different commercial structures. It is from this perspective that Connected Kerb makes the observations contained within this submission.

Section 3 – Reframing the Chicken-and-Egg Question

Connected Kerb agrees that a chicken-and-egg problem exists between EV adoption and charging infrastructure deployment. More charging infrastructure supports EV adoption, while increased EV adoption improves charger utilisation and supports additional infrastructure deployment. Connected Kerb supports the objective of targeted intervention to accelerate deployment and help break this cycle.

However, Connected Kerb does not consider this to be the only chicken-and-egg problem affecting the market. Public charging prices may also influence EV adoption. If consumers cannot access electricity at prices that reflect the broader economics of the electricity market, the economic benefits of EV ownership are reduced. To the extent that public charging remains materially more expensive than household electricity, this may itself influence EV uptake and the rate at which consumers transition away from internal combustion vehicles. The relationship between price, adoption and infrastructure deployment is therefore not simply a function of charger numbers. It is also a function of what consumers are asked to pay when they use them.

The question is not simply how to increase the number of chargers in the ground. The more important question is how to create a market that becomes increasingly self-sustaining as EV adoption grows , one that does not remain dependent on continuing government support and does not require consumers to pay a sustained premium for what they regard as a basic electricity service. Connected Kerb considers that the market structure adopted at this stage of development is the primary determinant of whether that outcome is achievable. The following section examines why.

Section 4 - Why Market Structure Matters

The previous sections have described two possible long-term outcomes for public AC kerbside charging. This section examines why those outcomes are not economically equivalent and why the choice between them has material consequences for consumers, for investment and for the long-term sustainability of the market. It is important to note at the outset that this analysis is directed specifically at public AC kerbside charging. It is not intended to characterise public charging generally. Rapid charging, destination charging and other premium charging environments create value through speed, convenience or price (though electricity arbitrage). In those environments consumers are knowingly purchasing a service and the pricing reflects that. Kerbside AC charging is different. Its primary purpose is to provide access to electricity where vehicles are already parked. The consumer's implicit expectation is that they are purchasing electricity , the same commodity that powers their home , rather than a premium service. This distinction matters because it shapes what a well-functioning market should deliver and how the economics of that market should be assessed.

Under a Charge Point Operator model, the infrastructure owner recovers its capital costs, operating costs and commercial return through the charging transactions that occur at its assets. The economic logic of this structure requires sufficient transaction volume at sufficient margin to sustain the investment. Where utilisation is low , as is common in public AC kerbside deployment , the model depends on either government grants to reduce the capital burden or elevated per-kWh pricing to improve margin, or both. This is not a consequence of inefficiency within the model. It is a consequence of the model itself. The experience of mature markets globally suggests that kerbside utilisation does not naturally reach the threshold required to support unassisted infrastructure investment, even as EV adoption grows. This appears to reflect a structural characteristic of kerbside charging rather than a transitional feature of an immature market.

Under an integrated electricity market model, kerbside charging infrastructure is owned and operated as regulated network infrastructure. Costs are recovered across the regulated asset base in the same way as other distribution assets. The economic logic of this structure does not require charging transactions to carry the full cost of the infrastructure. The cost is distributed across the network and recovered through regulated charges, in the same way as the cost of a substation or a feeder cable.

The economics behind that outcome bear closer examination. The distinction between these two structures becomes clearer when you consider where the value created by EV adoption actually flows. The purchase of an electric vehicle creates electricity consumption across homes, workplaces, commuter car parks, fleet environments and public charging locations. Public kerbside charging typically accounts for between 5% and 10% of total charging events. The balance occurs across the rest of the electricity system. A Charge Point Operator captures value only from the transactions occurring at its assets , that 5% to 10%. The electricity industry captures value from 100% of the electricity consumption created by EV adoption, regardless of where charging occurs. Electricity retailers and network businesses therefore have a fundamentally different commercial relationship with EV adoption than a Charge Point Operator does. The economic benefit of growing EV adoption flows through the electricity system broadly. It does not concentrate at the kerbside asset.

This structural difference has direct consequences for consumer pricing, for retail competition and for long-term market sustainability. On pricing, a Charge Point Operator must recover costs from a limited transaction base at typically low utilisation rates. An integrated network model recovers infrastructure costs across the broader rate base and allows energy to settle at retail electricity prices through normal market mechanisms. The result is that the two models are likely to produce materially different consumer pricing outcomes over time, even under similar deployment and utilisation scenarios. In mature markets, consumer pricing at public AC chargers commonly runs at 1.5 to 2.5 times prevailing household electricity prices. This is not a pricing policy question. It is an outcome of the underlying economics. On retail competition, under a CPO model consumer choice is exercised

at the point of selecting a charging network or location, and the consumer's electricity retail relationship does not typically extend to the charging transaction. Under an integrated model , particularly where Type 9 metering is utilised , the consumer's existing retail relationship can extend to the kerbside charger. Multiple participants , including retailers (FRMPs), EMSPs, Charge Point Operators and others , can settle energy through the same metering point. The consumer brings their retail contract to the charger rather than purchasing electricity from whoever owns the asset. As EV charging becomes a larger component of household energy expenditure, the model through which that expenditure is subject to competition has increasing significance for consumer outcomes. On long-term sustainability, a market that recovers infrastructure costs through charging transactions is structurally dependent on transaction volume and margin. Where utilisation remains below sustainable thresholds the model requires continuing external support. A market that recovers infrastructure costs through regulated mechanisms is not dependent on transaction volume in the same way, and the sustainability of the infrastructure is not contingent on utilisation reaching a particular threshold.

The two models are not variants of the same outcome. They produce different pricing structures, different competitive dynamics and different sustainability profiles. The purpose of this section is not to argue that one outcome is inevitable or that the other has no merit. It is to establish that the choice between them is consequential and should be made deliberately rather than emerge as an unintended consequence of implementation arrangements. The following section outlines the implementation measures that Connected Kerb considers most appropriate if the objective is to integrate public AC kerbside charging into the electricity market.

Section 5: - Implementation Framework.

If the objective is to integrate public AC kerbside charging into the electricity market, implementation arrangements must be designed to support that outcome. The following recommendations outline the conditions Connected Kerb considers necessary to ensure the program delivers efficient deployment, long-term consumer benefit and a market structure capable of sustaining investment without ongoing reliance on external support.

Recommendation 1 – DNSP Ownership and Delivery

The charging infrastructure funded under the scheme should be owned and operated by the DNSP. This provides the lowest cost deployment pathway, allows costs to be recovered through existing regulated mechanisms, and ensures the infrastructure remains available to support future market arrangements. The framework should not assume the long-term market structure is known today. Infrastructure funded under the program should remain capable of supporting a future fully regulated model, a retailer-led competitive electricity market model, or a future CPO-led model should policy makers ultimately choose that direction. The objective should be to avoid creating stranded assets or regulatory barriers that limit future market evolution.

Importantly, DNSP ownership of the physical infrastructure does not determine who supplies electricity to the consumer. The deployment framework should make clear that all infrastructure funded under the program is intended to operate as open access infrastructure, through which multiple participants , including retailers (FRMPs), EMSPs, Charge Point Operators and others can compete for the consumer's energy relationship. This is consistent with the program's intention that DNSPs not act as electricity sellers , that role remains with competitive market participants. Type 9 metering gives effect to this by enabling multiple participants, to sell and settle energy through a single metering point at the kerbside charger. The consumer's retail relationship's therefore preserved and strengthened, not displaced. This signals to the broader electricity market that kerbside charging infrastructure represents a genuine competitive opportunity , an extension of the electricity market rather than a captive asset class sitting outside it. The commercial opportunity this creates for electricity retailers (FRMPs) CPO's and EMSPs should be recognised as a feature of the program design, not an incidental outcome.

Recommendation 2 – Regulatory Certainty and Funding Continuity.

The program should operate independently of normal regulatory determination cycles. The five-year regulatory reset process should not delay or constrain deployment where funding has already been approved. The AEMC should ensure DNSPs have sufficient certainty to proceed with deployment programs without requiring repeated approval processes that slow rollout or create investment uncertainty. This is particularly important during the early market development phase where deployment speed is a significant factor in EV adoption outcomes.

Recommendation 3 – Future Ready Technical Standards

Infrastructure deployed under the scheme should be required to support future market integration. At a minimum, infrastructure should be Type 9 metering ready and capable of supporting settlement through the National Electricity Market.

Infrastructure should also be ISO 15118 ready. ISO 15118 is the communication standard that enables a charger to talk directly to the vehicle , it is the gateway between the charging infrastructure and the car. While ISO 15118 has become broadly standard in DC charging, it has not been consistently implemented across AC charging, which

is the primary focus of this program. This gap needs to be addressed deliberately rather than left to market preference. ISO 15118 is not simply a current capability requirement. It is the foundation for a broad range of existing and future innovations including plug and charge authentication, state of charge visibility, smart charging, demand response and vehicle-to-grid services. For this reason, ISO 15118 readiness should be treated as a critical future-proofing requirement for all AC infrastructure deployed under the program.

The objective should be to ensure that infrastructure deployed under the program does not need to be replaced in order to participate in future electricity market arrangements as they become available. It should be recognised that a significant proportion of the current Australian EV fleet is not yet ISO 15118 capable on AC. This will change as new vehicles enter the fleet. Infrastructure deployed today that is not ISO 15118 ready will be unable to realise those benefits at any point in the future , which is precisely why the requirement should be established now.

Recommendation 4 – Evidence Based Site Selection and Deployment Accountability

DNSPs should be required to use evidence-based methodologies when selecting charging locations. This may include geospatial modelling, utilisation forecasting, demographic analysis, EV ownership projections and other analytical tools.

Site selection should give particular weight to locations that serve consumers without access to off-street charging , the cohort for whom public kerbside infrastructure represents the primary means of accessing the electricity network for EV charging.

Connected Kerb's experience in the United Kingdom demonstrates that data-driven site selection materially improves utilisation outcomes and accelerates the time required for assets to reach sustainable utilisation levels. Connected Kerb operates an Automated Site Analytics Platform (ASAP-see attached) , a proprietary data-driven site selection platform developed through that experience, which is available to support DNSP deployment programs in Australia.

Recommendation 5 – EV to EVCI Ratio and Cap and Collar Framework

Public investment in kerbside charging infrastructure should be proportionate to actual and forecast EV adoption. Deploying infrastructure significantly ahead of demand risks creating underutilised assets and misdirecting public funding. Deploying infrastructure significantly behind demand risks creating charging deficits that undermine consumer confidence and slow EV uptake. A cap and collar framework governing the ratio of electric vehicles to public kerbside charging infrastructure addresses both risks by establishing the boundaries within which deployment should remain.

The collar represents a mandatory minimum deployment obligation. Participation in delivering the collar is not elective , every DNSP operating in a network area with measurable EV adoption is required to deliver public kerbside charging infrastructure at or above the collar threshold. This obligation exists because the electricity industry benefits from every electric vehicle purchased regardless of where that vehicle charges. DNSPs cannot under-deploy and free-ride on those broader system benefits while failing to deliver the kerbside access that supports continued EV adoption. A minimum infrastructure obligation reflects that shared responsibility.

The cap represents a consumer protection. Over-deployment of publicly funded infrastructure results in costs that are socialised across the broader consumer base through regulated charges. Where deployment materially exceeds what EV adoption levels justify, consumers who do not own electric vehicles are effectively cross-subsidising infrastructure that serves no current need. The cap ensures that public and regulated funding is

deployed proportionately and that the program does not generate stranded assets at the consumer's expense.

Together the cap and collar create a hard boundary framework within which DNSPs must operate. The specific ratio parameters should be determined by the AEMC and AER in consultation with DNSPs, having regard to EV adoption forecasts, geographic variation and network characteristics. Connected Kerb considers that establishing this framework at the outset of the program is considerably more efficient than attempting to correct deployment imbalances after they have occurred.

Recommendation 6 – Ongoing Utilisation testing to ensure Deployment Optimisation

Deployment targets should not be based solely on a fixed number of chargers installed within a defined period. A fixed target approach risks prioritising volume over quality, incentivising deployment in easily accessible locations rather than locations of greatest consumer need, and creating infrastructure that meets a numerical target while failing to deliver the utilisation and consumer outcomes the program is intended to achieve.

DNSPs should be required to demonstrate that deployed infrastructure achieves a minimum utilisation threshold within a defined assessment window. Connected Kerb considers that a two year window is a reasonable initial assessment period, after which utilisation performance should be measured against thresholds set by the AEMC and AER. Those thresholds should reflect geographic variation , a minimum utilisation level appropriate for a high density metropolitan location will differ from what is achievable and reasonable in a regional or outer suburban setting. The framework should therefore establish differentiated minimum thresholds by location type rather than applying a single national standard that fails to reflect the material differences in demand across different network areas.

Where a deployed asset fails to achieve its applicable utilisation threshold within the assessment window, the DNSP should be required to review the asset, assess whether relocation would produce a better outcome, and in most cases remove and redeploy the asset to a location where the threshold is achievable. The cost of relocation should be borne by the DNSP and should not be automatically recoverable through the RAB. This creates a direct financial consequence for poor deployment decisions and ensures that the cost of underperforming assets is not socialised across the broader consumer base.

This mechanism operates as the performance enforcement layer sitting beneath the cap and collar framework established in Recommendation 5. The cap and collar sets the boundaries within which deployment must remain proportionate to EV adoption. Ongoing utilisation testing ensures that deployment within those boundaries is optimised rather than merely compliant. Together, Recommendations 4, 5 and 6 are intended to operate as an integrated planning, proportionality and performance framework that drives continuous improvement in deployment outcomes over the life of the program..

Section 6: - Responses to Inquiry Questions

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?*

Answer 1

Connected Kerb agrees with several elements of the problem statement but considers the central issue to be broader than the chicken-and-egg framing suggests. As outlined in Section 3, the relationship between price, adoption and infrastructure deployment means that market structure , not simply charger numbers , is the primary determinant of long-term outcomes. The intervention should be assessed against its ability to create a self-sustaining market, not simply to increase deployment in the short term. Connected Kerb also notes that an elective program carries an inherent delivery risk , without a mandatory participation obligation, there is no guarantee that infrastructure will be deployed in any given network area regardless of EV adoption levels. This risk is addressed in Recommendation 5.

Connected Kerb agrees that a chicken-and-egg problem exists and supports targeted intervention to address it. Connected Kerb also agrees that market failure is likely in some regional and remote locations where utilisation will never support commercial investment, and supports targeted intervention in those locations.

On connection processes, site identification and facility access fees , Connected Kerb recognises these can influence deployment speed and cost. However, we do not consider them to be the primary barriers. Removing them alone would not resolve the underlying structural challenge described in Section 4.

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?*
2. *Do you agree with the proponent's assumptions in the modelling?*

Answer 2

Connected Kerb is not in a position to comment on the emissions modelling methodology. Our submission is directed at market structure, deployment models and consumer outcomes.

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?

Answer 3

Connected Kerb agrees that the benefits of the funding program extend beyond emissions reduction. The program has significant potential to generate insights into how EV charging interacts with the broader electricity market.

As EV adoption increases, understanding how EVs consume, store and potentially export electricity will become increasingly important. EVs and EV charging are ultimately another use case for electricity, and understanding how they interact with the broader electricity market may prove more valuable than the charging infrastructure itself.

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?

Answer 4 –

Connected Kerb agrees that it is appropriate for electricity consumers to contribute to the cost of approved EVCI projects. Consumers already contribute to public charging infrastructure through taxation which funds grants. Even in mature markets, charge point operators continue to rely on significant government funding to initiate infrastructure deployment.

The relevant question is therefore not whether consumers contribute, but whether the proposed model can deploy infrastructure at lower cost and deliver electricity to consumers at prices closer to household rates, that represents a materially better return on the consumer contribution than a model that continues to require ongoing grant support while delivering electricity at a sustained premium. Connected Kerb considers this distinction to be directly relevant to the AEMC's assessment of the proposed funding arrangements.

Question 5 – Proposed DNSP Recovery of Residual Costs

Do you agree with how the rule change request proposes that residual costs (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?*
2. *Allow a DNSP's RAB to be adjusted to include opex for approved EVCI projects for the first five years?*
3. *Treat any ongoing opex in subsequent regulatory control periods in the same way as opex for standard control services under the NER framework?*

Answer 5

Connected Kerb is not sufficiently involved in the detailed operation of the RAB framework to provide a view on the specific regulatory mechanisms proposed. We have no objection in principle to the proposed approach if it facilitates timely deployment and provides DNSPs with the certainty required to proceed with investment.

Connected Kerb does consider that whatever cost recovery mechanism is adopted should be accompanied by appropriate utilisation and deployment obligations to encourage efficient investment, optimise site selection and minimise the risk of underutilised or stranded assets. This is consistent with the recommendations outlined in Section 5.

Question 6 – Proposed Timing for DNSP 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?

Answer 6

Connected Kerb is not sufficiently involved in the detailed operation of the RAB framework to provide a definitive view on the preferred timing mechanism. However, if allowing cost recovery within the current regulatory control period through a reopener would accelerate deployment, Connected Kerb supports that approach. Deployment speed is a material factor in EV adoption outcomes and the regulatory framework should not be a constraint where funding has already been approved and investment is ready to proceed.

As with Question 5, any cost recovery mechanism should be accompanied by appropriate utilisation and deployment obligations consistent with the recommendations in Section 5.

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?*
2. *The restricted asset provisions should not apply where they would otherwise prevent or limit a DNSP from delivering an approved EVCI project?*

Answer 7 –

Connected Kerb does not have sufficient expertise to comment on the specific NER proposals. Where the proposed changes remove barriers to efficient deployment of approved EVCI projects, we support them.

Question 8 – Alternative Solutions
Are there alternative solutions for integrating the proponent's funding program in the NER that you think we should consider?
Answer 8 –
As discussed throughout this submission, Connected Kerb considers that the strongest alternative would be to allow 100% of approved EVCI costs to be included in the RAB.
In considering this proposal, Connected Kerb recognises that extending the role of a natural monopoly into a new area requires careful assessment. The relevant question is whether the consumer benefit delivered through network ownership so significantly outweighs the risks associated with monopoly provision that it justifies the extension. Connected Kerb considers that it does. The combination of substantially lower infrastructure costs, electricity delivered at prices approaching household rates, and the preservation of retail competition through Type 9 metering produces a consumer outcome that a fragmented CPO-led market is structurally unlikely to replicate. Where a natural monopoly delivers a materially better consumer outcome than the available alternative, the case for network ownership is not a concession to monopoly , it is the point.
Connected Kerb considers this approach would deliver clearer long-term consumer outcomes and better support the emissions reduction objectives reflected in the National Electricity Objective.

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 (for example, should DNSPs be able to replace the EVCI)?
Answer 9 –
Connected Kerb considers that EVCI assets funded through the regulated framework should be capable of being replaced by DNSPs as part of the normal asset replacement and upgrade cycle, consistent with the treatment of other regulated network assets. There is no compelling reason to treat regulated EVCI assets differently at the end of their operational life.
The more important consideration is that assets deployed today should be future-ready , capable of supporting evolving market arrangements, metering configurations and technical standards without requiring full replacement. This reinforces the importance of the technical standards outlined in Recommendation 3 of Section 5. Infrastructure that is deployed to current minimum standards rather than future-ready standards may create premature replacement costs that ultimately fall on consumers.

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 1 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:

1. *as provider of last resort for kerbside charging in metropolitan areas?*
2. *as the provider of EV charging for uncommercial regional blackspots?*

Answer 10 –
Connected Kerb's view is that EV charging should be integrated into the electricity market rather than developed as a separate industry operating alongside it. From that starting point, the role of DNSPs is not limited to last resort provision or regional blackspot coverage. DNSPs are the natural owners of kerbside charging infrastructure in both metropolitan and regional settings because they are already the owners of the network to which that infrastructure connects.
The current framing does not create certainty of participation and therefore does not create certainty of any particular outcome. Positioning DNSPs as provider of last resort only when CPOs decline to participate leaves open the possibility that infrastructure is not deployed in a given network area at all. Connected Kerb considers

this insufficient. A positive deployment obligation on all DNSPs , consistent with the cap and collar framework proposed in Recommendation 5 , ensures that consumers in every network area can expect a minimum level of kerbside infrastructure proportionate to EV adoption, regardless of CPO participation decisions.

In regional and remote locations, DNSPs are likely to remain the only economically viable deployment pathway regardless of market structure. In metropolitan areas, the case for DNSP ownership rests on the consumer benefits described throughout this submission , lower infrastructure costs, electricity delivered closer to household rates, and retail competition preserved through Type 9 metering.

Where charge point operators can add value, the regulatory framework should provide a pathway for them to participate within the electricity market rather than alongside it.

Conclusion:

The decisions made through this program will shape far more than the structure of public kerbside EV charging infrastructure. They will shape how electric vehicle ownership is considered by the consumer. Electricity should be placed at the centre of that discussion, cognisant of all charging events and how each plays into the long-term consumer outcome. The risk of treating EV charging as a standalone industry, rather than recognising EV ownership as another use case for electricity, is substantial. So too are the benefits of getting it right.

The rules implementing that model must be designed to ensure the intended outcome is actually delivered with certainty of participation, certainty of deployment and certainty of consumer benefit built into the framework from the outset.

Connected Kerb is based in Melbourne, Australia and welcomes the opportunity to discuss any aspect of this submission with the Commission at its convenience.

ASAP

Automated Site Analytics Platform

The future is electric.
We're here to make it easy.

Connected Kerb

Call to Action

Connected Kerb

✓ Reduced effort

70%

We were able to save up to 70% of effort compared to traditional site selection and planning, due to a smaller total land area is considered.

✓ Automated Process

86%

Creating a standardized process based on years of expert knowledge and industry expertise, allowed us to save 86% of time compared to the manual process.

✓ Creating IP

72%

72% of our data insights created by our operating network is feed back into the tool to predict best sites.

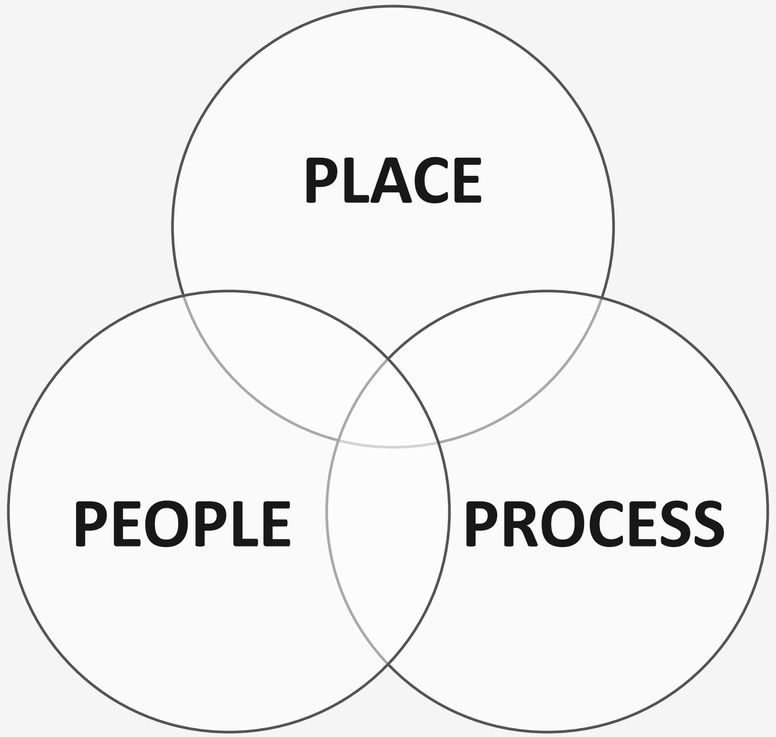
✓ AI & Utilisation

82%

We back-cast real performance with predicted performance to improve our algorithms and built out our knowledge models. Currently we do have a 82 % hit-rate on local level.

Site Selection

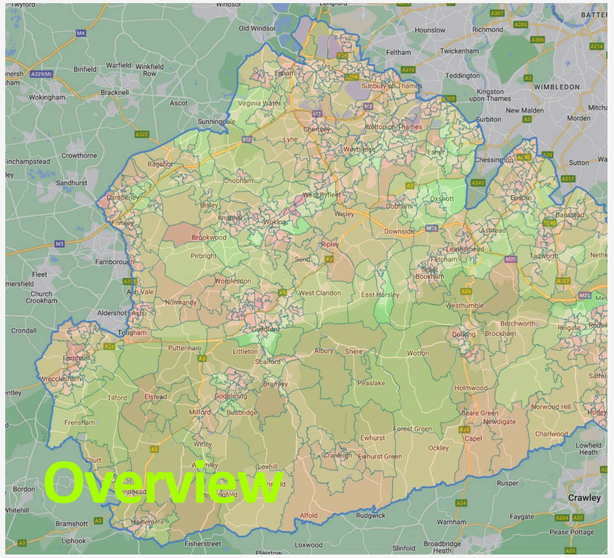
- Infrastructure (parking, pavement & power)
- Existing street furniture and devices (what's already there)
- Permits (what is permissible/what is possible?)

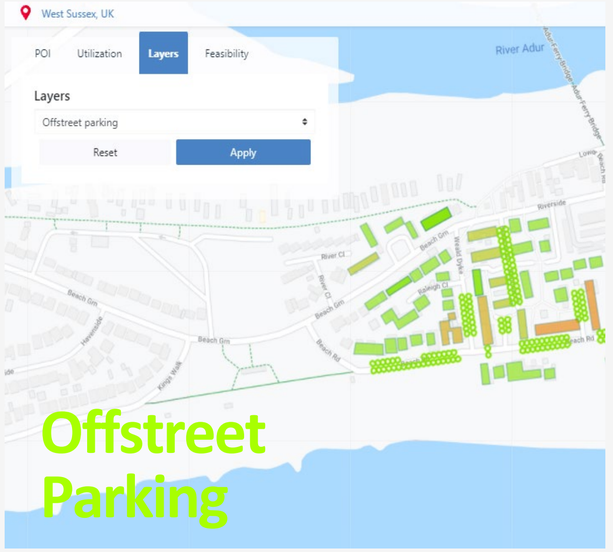


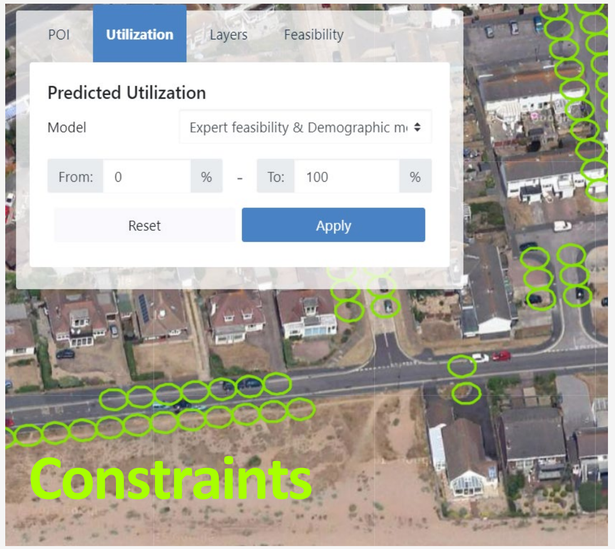
- Demographic
- Sociographic
- Industry data & research

The result: 31% Site selection acceptance by build team

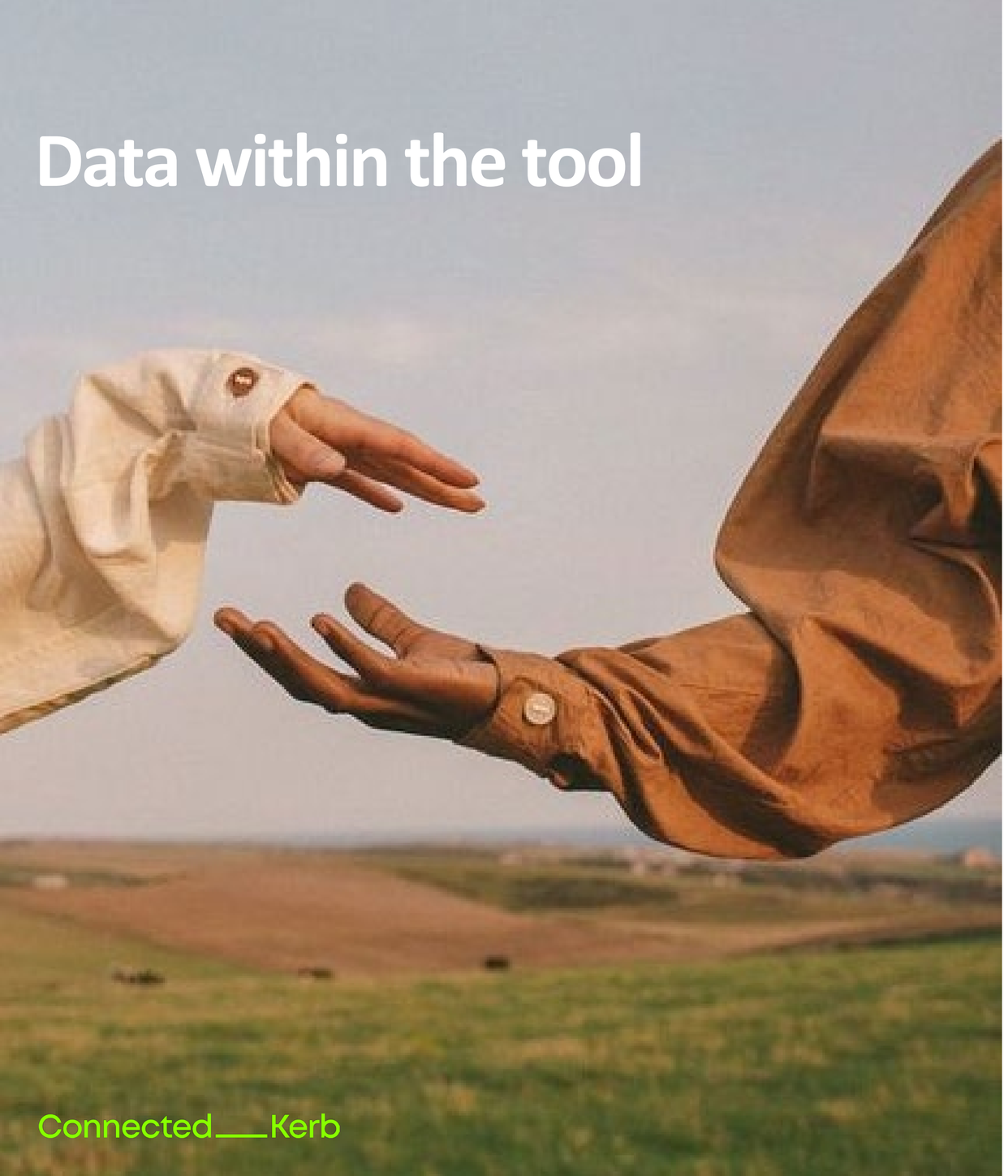
- Prioritisation
- Engagement
- Utilisation & evolution







Data within the tool



Public Data

- Publicly available via the government
- Updated regularly
- Available for everybody
- E.g. wealth data, population density, car ownership

Industry Data

- Purchased sector data via private vendors
- Updated regularly
- Fine accuracy
- E.g. EV ownership, cable layout, street furniture

CK Data

- Data generated by the Connected Kerb network
- Behavioural data
- Modeled data
- E.g. session data, utilization data, dwelling type, off-street parking

The Data within

Industry Data:

- Two plus cars percent
- TTW car index
- EV ownership index
- Terraced house index
- Car buying index
- Detached house index
- One car percent
- Household income
- Off-street percent
- Demographic data
- Car ownership density
- Residential property price
- Population density
- EV Count (LAD)
- Household income
- Population age
- Traffic data
- Traffic flows
- Other data
- Predicted off street parking - v1Residents requests

Constraint Data

To avoid:

- Junctions
- Lamp colums
- Traffic lights
- Rural roads between fields etc.

Infrastructure Data

- Street levels
- Flooding areas
- Power lines (LV and HV)
- Mobile signal strength data

Points of Interest Data

To reflect dwell time at a location.

- Short dwell time: e.g. café, shops, GP practice etc.
- Long dwell time: e.g. office spaces, camp sites, schools, museiums..

Data from Local Authorities

- Commonplace Data
- Highway Boundaries
- Parking Restrictions
- Wetspots
- Etc.

Traffic Data

- TRO Data
- Traffic signs
- Traffic volume

Modeled Data

- Predicted off-steet parking
- Indexes

Other EV charging data

- Rapid, Ultra-rapid, Slow and Fast charging station data
- National Chargepoint Registry

Geographical Administrative Area Data

- Districts
- Wards
- Boroughs

CK Network Data

- Session Data
- Utilization Data
- Uptime Data

We use 8 data sets, 2 homemade, to rate all sites by a potential utilisation score

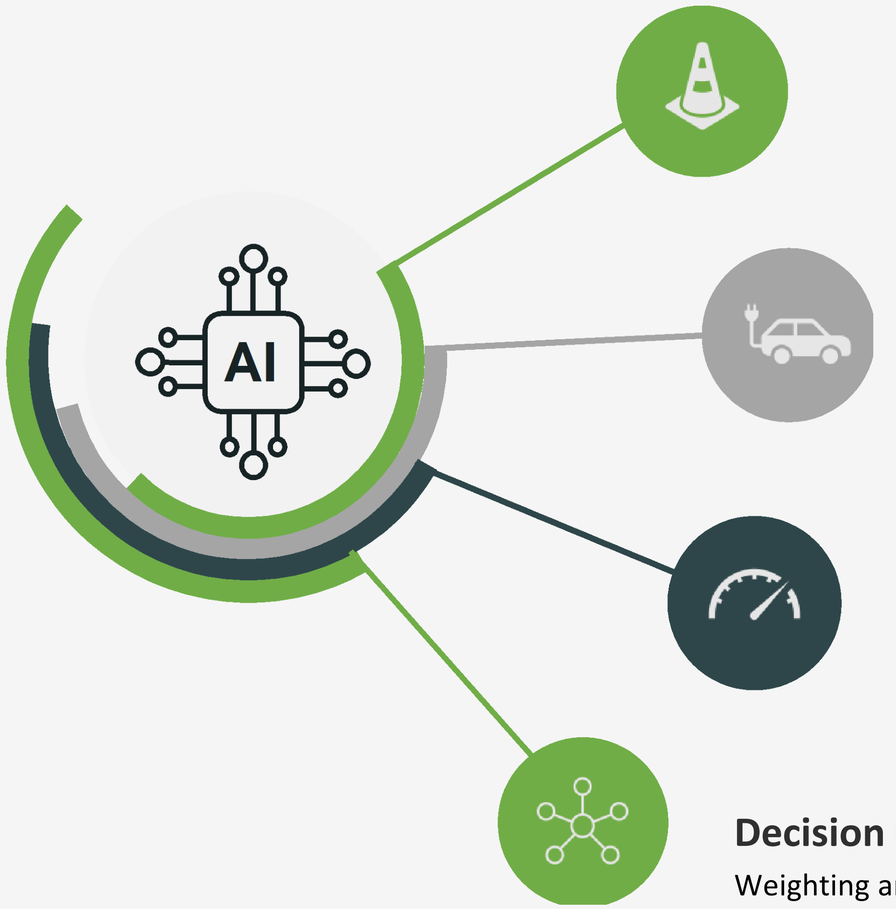
How we use AI

Building out our IP

On from rules, we use heuristics and advanced data science to fuel our AI models.

With a high use of the tool, the algorithms learn and develop a higher precision.

Through our constant application of the tool on all our projects, we can improve the hit-rate from 30% at the beginning, to 82% now.



Constraint Modelling

Representing, predicting, and excluding constraints, which would affect potential EV infrastructure.

Behaviour Modelling

Feeding real consumer behaviour from our network into our models to serve potential consumers best and meet demand.

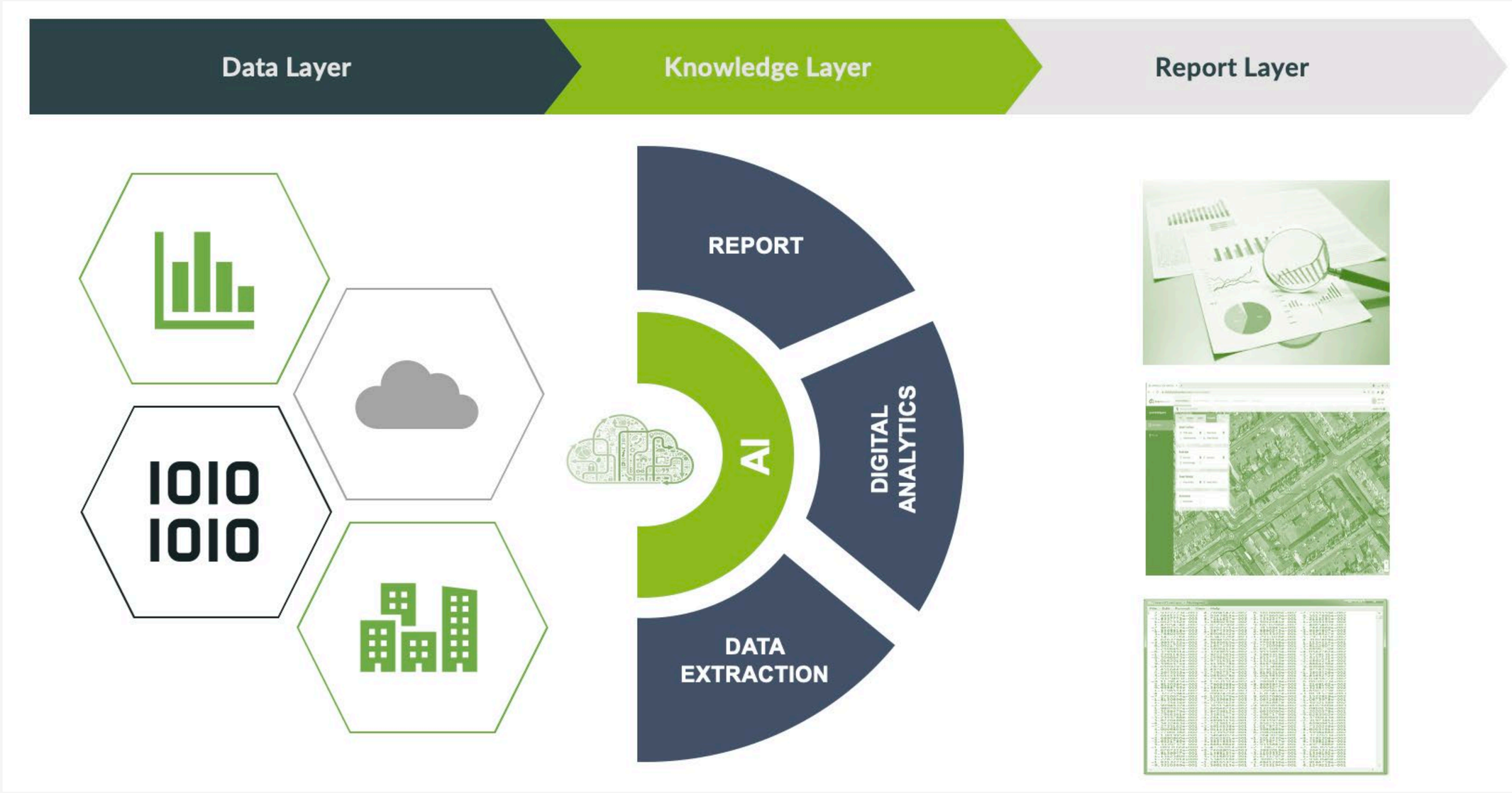
Utilization Modelling

Bringing utilization and session data produced by our network into the algorithm to predict best sites and the number of sockets.

Decision Making

Weighting and prioritising different network options to develop a balanced estate.

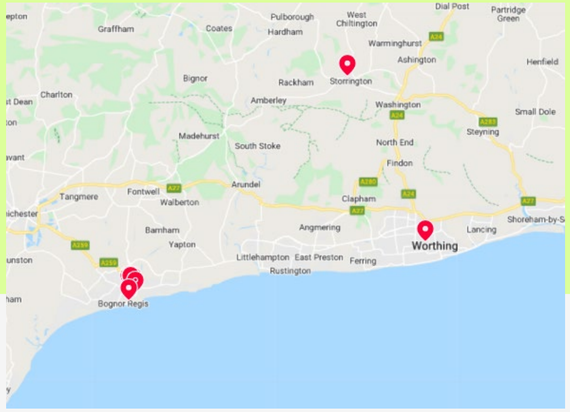
How it works


Data Layer
Knowledge Layer
Report Layer
1010
1010
REPORT
AI
DIGITAL ANALYTICS
DATA EXTRACTION

Process

Proposal

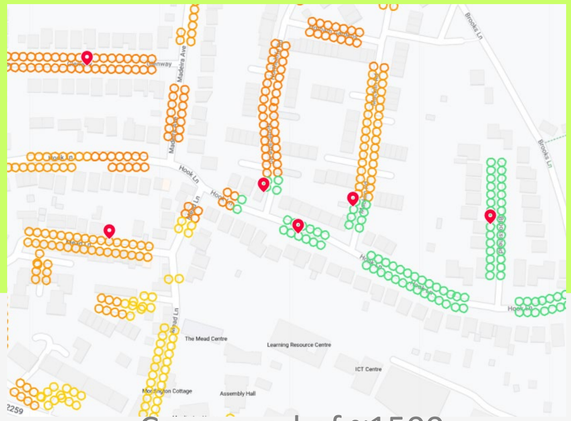
- Speculative
- First assessment of the area
- Indication and lead generation
- Data ingestion



e.g. 500 sites

In Review

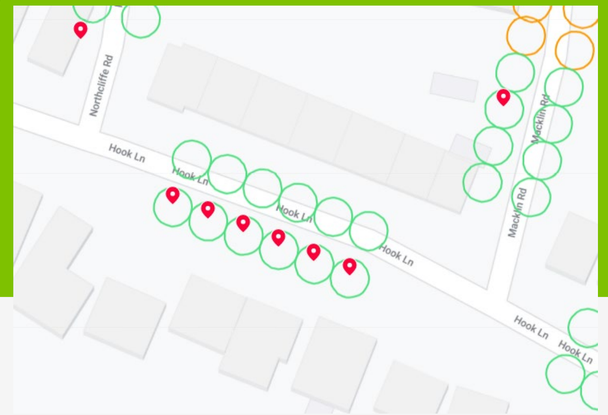
- Client discussion / negotiation
- Expose the insight within the locations
- Defining focus neighbourhoods



Composed of ~1500 streets

Approved

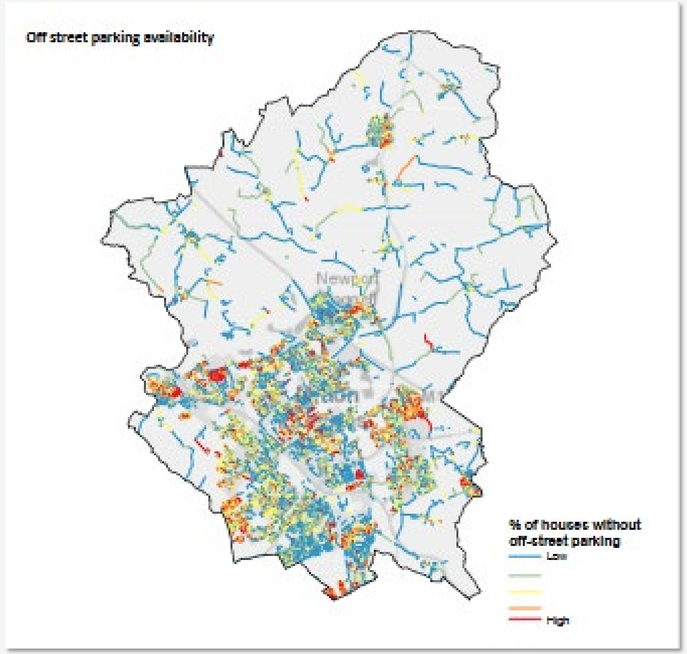
- Compatibility with traffic regulation and parking restrictions
- Client & operations agreed
- Hand over to Site Tracker



and ~5000 charge points

Exporting Data

Maps, forms and reports



Site #	Street Name (with Link)	Description	Parking Regulations	Suitable Bays	Proposed # EVCP	Milton Keynes Council (Davina Millership Comments)	Western Power (Graeme Hill Comments)	Comment	Dedicated Bays (THO's requested)	Total EVCP	Year 1 Activated EVCP	Comment Score (RAG)	5 Minute walk Area
3	Wodell Drive	Wodell Drive is conveniently located in a residential area of Wolverton with little off-street parking availability.	Nil	5	5 7kW (1 single, 2 dual) chargers		Embedded network - Southern Electric Power Distribution plc	5 perpendicular bays available. Wide pavement and ample space for feeder pillar. There is an embedded network from The Electricity Network Company.	2	5	2		0.145
4	Oriel Close	Oriel Close is conveniently located in a residential area of Wolverton with little off-street parking availability.	Nil	6	6 7kW (3 dual) chargers		185 AllCuCNE in footway, TX 500kVA - connection likley	6 parallel bays available. Wide pavement and ample space for feeder pillar. There is a likely connection via an existing connection in the footway.	2	6	2		0.195
5	Church Street (west)	Church Street is conveniently located in a residential area of Wolverton with little off-street parking availability.	Nil	11	10 7kW (5 dual) chargers		185 AllCuCNE in footway, TX 500kVA - connection likley. 2 x HV cable in footway alongside LV	11 parallel bays available. Wide pavement and ample space for feeder pillar. There is a likely connection via an existing connection in the footway.	4	10	4		0.235
6	Mccorquodale Road	McCorquodale Road is conveniently located in a residential area of Wolverton with little off-street parking availability.	Nil	10	8 7kW (4 dual) chargers		unable to locate	10 parallel bays available. Narrow pavement may be an issue.	4	8	2		0.205
7	Barr Piece	Barr Piece is conveniently located in a residential area of Wolverton.	Nil	4	4 7kW (2 dual) chargers		95 AllCuCNE mains cable in footway, TX 315kVa - connection likely	4 parallel bays available. Narrow pavement may be an issue. There is a likely connection via an existing mains cable in	2	4	2		0.215
8	Eton Crescent	Eton Crescent is conveniently located in a residential area of Wolverton with little off-street parking availability.	Nil	4	4 7kW (2 dual) chargers	good location adj to flank wall - however potentia issues with bag opposite crossover. Also what is the width of verge/footway?	185one mains cable in footway, TX 800kVA - Connection likely	4 parallel bays available. Grass off the footway and ample space for feeder pillar. There is a likely connection via an existing mains cable in the footway.	2	4	2		0.185
9	Furze Vag	Furze Vag is conveniently located in a residential area of Wolverton with little off-street parking availability.	Nil	22	6 7kW (2 single, 2 dual) chargers	potential however income bracket is an issue? Retirement area? Agree easy dig	0.1Cu mains cable in footVAY, TX 800KVA - connection likley	20-25 parking bays available on the traffic island, with ample space for a feeder pillar. There is a likely connection via an existing mains cable in the footway.	2	6	2		0.205
10	The Square	The Square is conveniently located in a shopping area of Wolverton with little off-street parking available and terraced housing nearby.	1 hour	9	9 7kW (1 single, 4 dual) chargers	No not residential - shopping area, lower income. Layout suitable	0.5AL mains at the square, very close to 500kVA TX	9 parallel bays available. Wide pavement and ample space for feeder pillar. There is a potential to replace existing parking posts to minimize additional street furniture. There is a power connection	3	9	3		0.225
11	Green Lane	Green Lane is conveniently located in a residential area of Wolverton with little off-street parking availability.	Nil	20	10 7kW (5 dual) chargers		0.1Cu mains cable in footway, TX 315KVA - connection likley	15-20 parallel bays available. Wide footway backing onto grass, with ample space for a feeder pillar. There is a likely connection via an existing mains cable in the footway.	4	10	4		0.235
12	Southern Vag	Southern Vag is conveniently located in a residential area of Wolverton with little off-street parking availability.	Nil	11	10 7kW (5 dual) chargers	potential however income b	the point of connection is over 400M from the substation and LV cable is in the footway away from the curb edge. TX 750kVA	11 parallel bays available. Wide grass footway and ample space for feeder pillar. Connection is available 400m away.	4	10	4		0.165
13	High Street, Stony Stratfor	High Street, Stony Stratford is conveniently located in a shopping area of Stony Stratford with little off-street parking available and terraced housing nearby.	Nil	8	8 7kW (4 dual) chargers	potential - sensitivity over aesthetics of posts but ideal income anticipated good take up	0.3Cu mains cable in footway, very close to 800kVA tx	8 parallel bays available. Wide pavement with ample space for feeder pillar. There is a likely connection via mains cable in footway. Length of run limited by lamp columns and dropped kerbs.	4	8	2		0.265
14	Horsetail Green	Horsetail Green is conveniently located in a residential area of Stony Stratford with little off-street parking availability.	Permit Holders	12	6 7kW (3 dual) chargers	Potential along garden wall for most of 6 bays? High income area, verge/footway wide enough	Small LV mains cable 120CNE, impedance could be a problem, 1000kVA substation	12 parallel bays available. Wide pavement and grass verge with ample space for a feeder pillar. Small mains cable available.	2	6	2		0.215
15	King Street	King Street is conveniently located in a residential area of Stony Stratford.	Nil	5	5 7kW (1 single, 2 dual) chargers	Unlikely to be highway, small commercial units at back - not sure if residents usage high, questionable income bracket/demand	over 300m from TX however it is 1000KVA so impedance may not be a problem. This will only be established by a network study	5 angled bays available, with further bays available in residents only car park. Footway with grass verge and ample space for feeder pillar. Connection available 380m away, feasibility must be established by a network study.	2	5	2		0.115

CONNECTED KERB

EVCP Site Selection Report: Austen Avenue

Issue: Final | Versions: 1 | Date of Issue: 9 Mar 2021
Designer: Tomas Schuscheim | Checked By: Tomas Schuscheim | Approved By: Paul Ayres

Site Number:	Milton Keynes_34	Kerb Height:	125mm
Borough:	Milton Keynes	Footway Material:	Asphalt/grass
Road Name:	Austen Avenue, Olney	Footway Width:	+2m
Post Code:	MK46 4DL	Feeder Pillar:	Middle of run
Latitude Longitude:	52.157362, -0.699590	Parking Restrictions:	Nil
Number/Type EVCP:	8 x 7kW, 32amp	Potential Risks:	Lamp columns
Other existing EVCP:		Power supply:	62kVA

Site Overview: Austen Avenue is conveniently located in a residential area of Olney. The site has long runs of parallel parking bays, with grass off the footway allowing space for pedestrians. However, the length of potential deployments is limited by lamp columns. The site can also serve users of the Olney Youth Club. We are proposing 8 bays with 4 dual EVCPs.

Location plan / Site Photos:

8 x bays on South side of the road

Blue rectangles indicate proposed EVCP bays

Red dots indicate proposed feeder pillar location

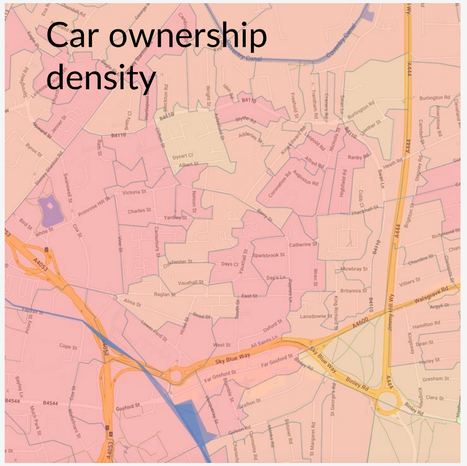
Green dots indicate proposed EVCP location

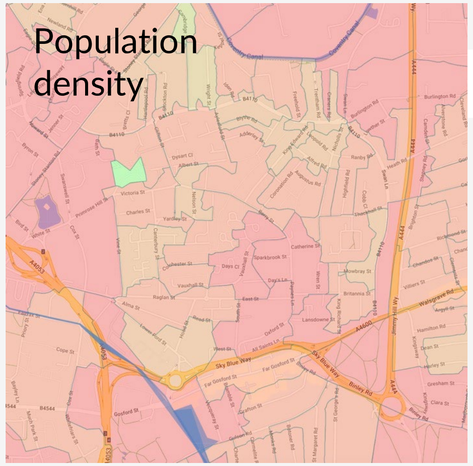
EVCP Bays (indicative)

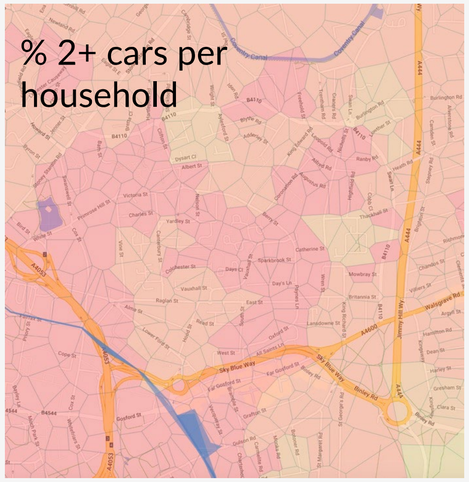
EVIGS SEAL MAYOR OF LONDON CITYC INNOVATION CHALLENGE WINNER 2018 UN75 2023 AND BEYOND TECH NATION

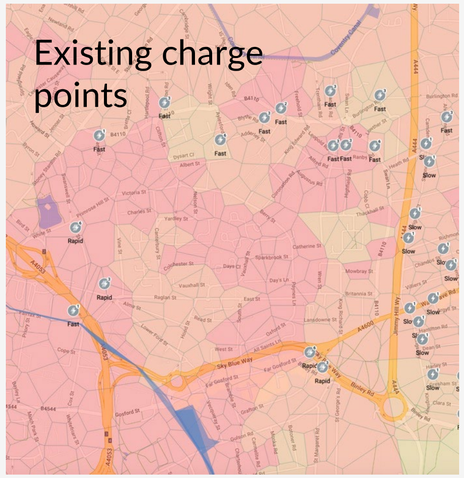
Don't underestimate key steps such as public consultation and others

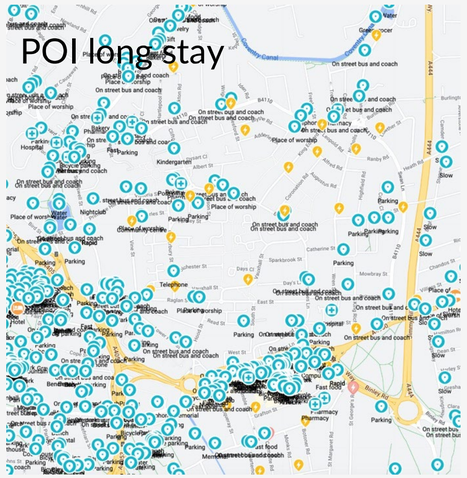
Example network planning

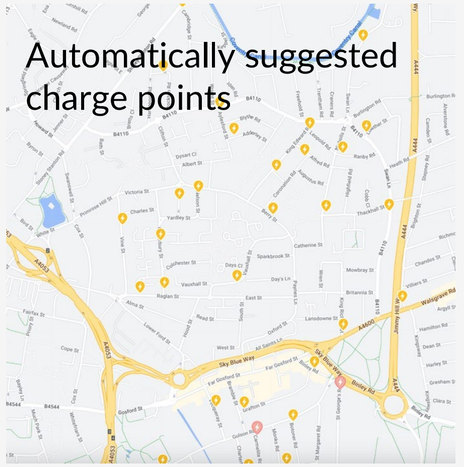


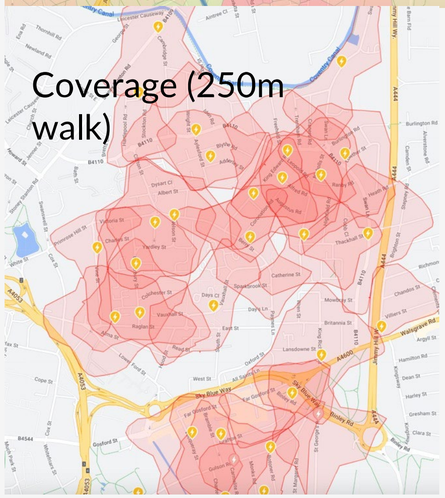






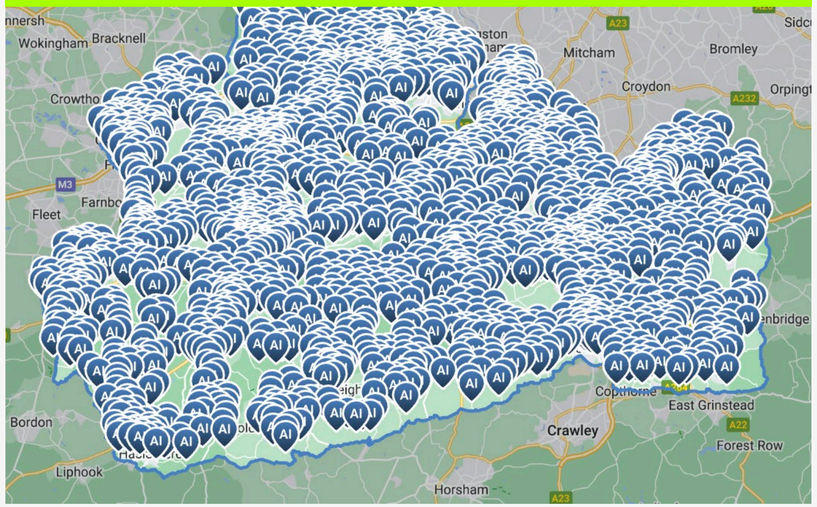




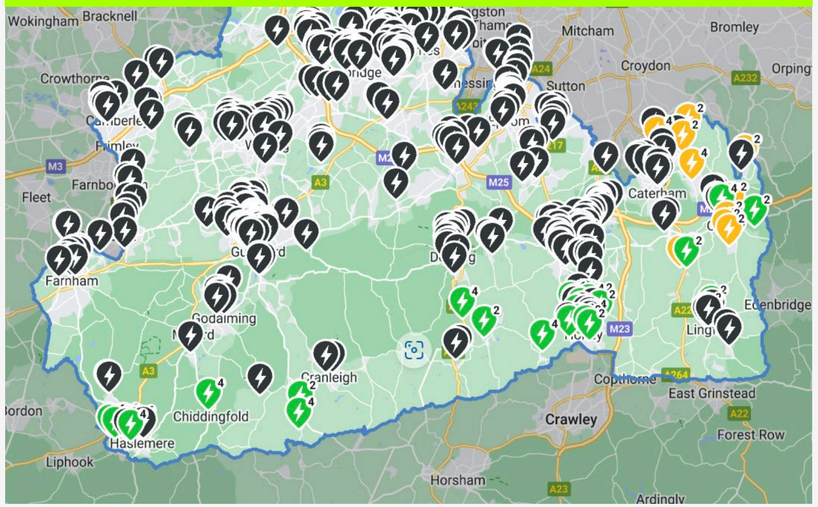


Example – Surrey

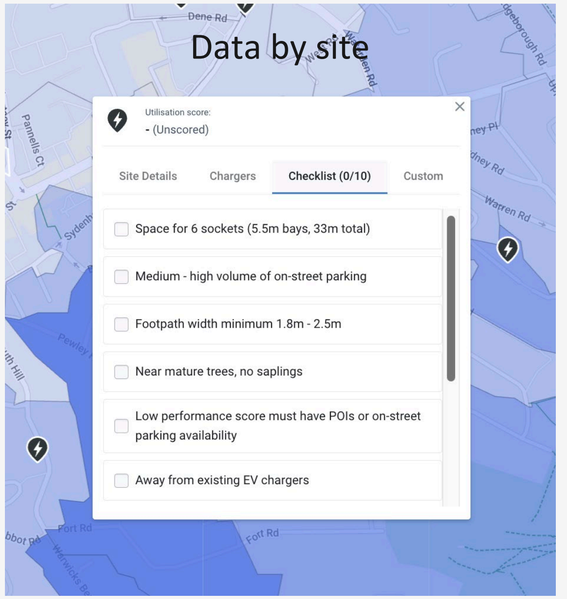
Utilisation based Saturation model



Phased Planning by EV uptake



Data by site

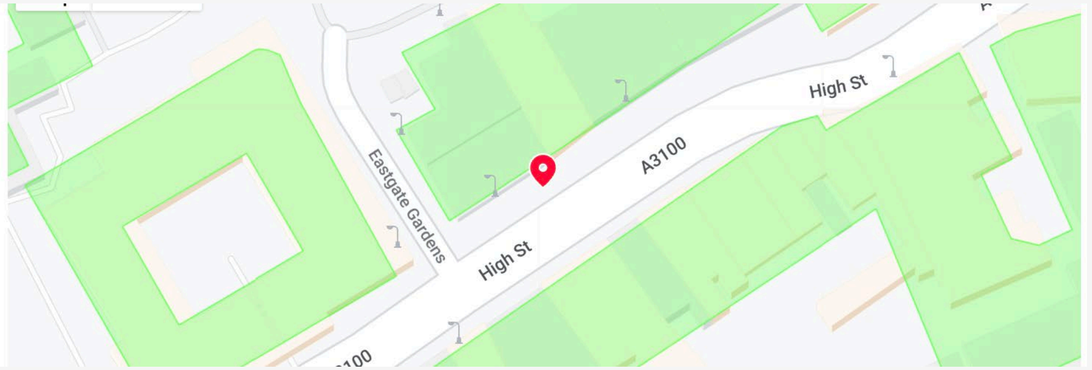


Detailed site information available as an export in multiple formats to automated process and assist policy makers.

Model Name	**Unscored**
Predicted Utilization	-

Additional site metrics

Median household income within LSOA	**42,300**
Median property price within LSOA	**400,000**
Number of registered EVs within local authority	**1,800**



Thank You