

23 July 2026

Alfredo Careaga
Project Lead
Australian Energy Market Commission

Dear Alfredo,

Clarifying distribution ring fencing in emerging energy markets Consultation Paper

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) Clarifying distribution ring fencing in emerging energy markets Consultation Paper.¹

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA has strong concerns about the proposed rule changes in Nexa Advisory's request and does not agree that there is a clearly demonstrated problem that this request seeks to address. Any waiver application is subject to Australian Energy Regulator (AER) discretion and its in-depth approval processes. The rule change request lacks a clear articulation of any systemic issues that would warrant elevating existing waiver conditions into more prescriptive obligations in the National Electricity Rules (NER).

Delivering efficient outcomes for consumers

Given the pace the energy transition requires, waiting for commercial markets to develop in certain services, which may not occur, risks holding the transition back rather than supporting it. ENA considers competitive markets are one force to deliver efficient outcomes for customers and accelerate the energy transition. However, there are instances where competition is non-existent or insufficient and this should not be a reason to limit development that would benefit customers.

The AER has previously supported networks' role in contestable markets as part of regulatory reform opportunities to bolster productivity growth:²

...the urgency of the transition means we need to consider whether there are circumstances in which markets may be failing to deliver the required investment or where participation from networks can bring benefits such as improved productivity of the energy system which outweigh detriments...

ENA considers NSP involvement can enhance productivity where there are:

- economies of scope, where the network service provider (NSP) can deliver a service at lower or incremental cost by reusing existing assets, systems and workforce capacity – avoiding the cost of duplicating that capability, while increasing the speed of delivery, provided this reflects a genuine advantage rather than an ability to cross-subsidise from regulated revenues,

¹ AEMC, Clarifying distribution ring fencing in emerging energy markets, [Consultation Paper](#), 25 June 2026.

² AER, *Letter to the Treasurer – regulatory reform opportunities*, August 2025, p 5.

- opportunities to better coordinate the uptake of a technology and its supporting infrastructure by internalising both within one entity to resolve a deadlock that would otherwise persist between separately incentivised parties, and
- externalities, where the service generates benefits (or costs) to parties beyond those transacting, such that private provision by a provider may fall below the socially efficient level because the party investing does not capture the full social benefit.

Importance of trials in emerging markets

The energy transition involves integrating new technologies to deliver a renewable energy grid which ensures security of supply and delivers new services to customers. In order to learn and evolve through the energy transition, NSPs must be able to undertake trials in a controlled environment. ENA strongly disagrees with the proposition that waivers should only be provided as a last resort. Without the ability for trial waivers, NSPs are limited in their ability to improve understanding of new technologies, publish trial learnings and provide long-term efficiency gains for the whole industry.

As an example, the Nexa Advisory rule change request points to stakeholder concerns about CitiPower Powercor UE's (CPU) trial waiver for kerbside Electric Vehicle Charging Infrastructure (EVCI) approved in 2025³, suggesting concerns on possible distortion to competition from DNSPs entering the EVCI market through leveraging monopoly assets. At the time of the waiver application, there was no kerbside charging in Victoria and extremely limited public EVCI, in contrast to development in other states. CPU stated the trial's purpose was to understand the impact of EVCI on the local network, customer behavioural changes, and insights into the connection processes of EVCI, none of which had been tested before, and provide insights otherwise not achievable.

Undertaking trials through waivers is an important part of the regulatory framework, supporting innovation and the progression of the energy transition. NSPs should be encouraged to adopt new technologies to deliver the benefits of a renewable system, rather than being constrained by inflexible conditions that may lack nuance in relation to particular circumstances.

Clarification on the problem the rule change wishes to solve

Many of the proposed changes in this rule change are standard conditions in existing approved waivers. NSPs apply for waivers in wide ranging circumstances relevant to their local network, requiring flexibility in the AER's assessment approach. The AER assessments are in-depth and strongly consider stakeholder feedback received through public consultations. Prescribing a blanket approach in the NER risks losing flexibility in the AER's discretion for approval and the nuance required for each application.

The increased occurrence of waivers is not a sign of ring-fencing rules weakening, but rather a function of the operating environment. The energy transition calls for innovation to deliver the investment needed, including in emerging services where commercial markets may not yet be sufficiently developed. Market bodies and governments are supportive of innovation, and have allowed waivers with proportionate conditions, customer protections, and transparency providing long-term benefits to customers and the wider economy.

³ AER, [CitiPower, Powercor, and United Energy - Ring-fencing waiver - Electric vehicle charging infrastructure](#), 22 October 2025

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Senior Regulatory Analyst, via vbaikie@energynetworks.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Dom Adams', with a stylized flourish at the end.

Dominic Adams
Acting Chief Executive

23 July 2026

Mr Alfredo Careaga
Project Lead
Australian Energy Market Commission

Dear Alfredo,

Electricity Network Regulation Review package one consultation paper

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC's) package one consultation paper as part of its Electricity Network Regulation Review (ENRR). The scope of this package focuses on:

- how different services provided by network service providers (NSPs) are classified and regulated, and
- how various tools – such as ring-fencing, cost allocation, connections and facility access and shared asset arrangements – are used to limit the ability of NSPs to leverage their regulated monopoly position into contestable markets.

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA is supportive of the AEMC's initiation of the ENRR and the holistic approach to updating network regulation for the future system. Australia's energy transition is at an important stage and it is necessary that the economic regulatory framework governing NSPs is fit for purpose going forward so that:

- consumers continue to have access to safe and reliable electricity,
- consumers pay no more than needed, and
- the energy system supports the achievement of emissions reduction targets.

Our vision of a fit for purpose economic regulatory framework is one that is sufficiently flexible to deploy the technologies and infrastructure underpinning the energy transition at the pace customers need and at the lowest sustainable cost to them. ENA considers that the current framework is not moving at the pace required by the energy transition, with the impact of delay ultimately passed on to customers in the form of higher costs and slower access to its benefits. Absent change, the gap between the pace the transition requires and the pace the regulatory framework can accommodate is likely to widen.

As part of facilitating a timely transition, ENA is strongly supportive of changes to the distribution service classification framework to permit NSPs to provide regulated services where this is the most efficient means of delivering customer outcomes. Given the required pace of the energy transition, waiting for competitive markets to develop independently risks holding back the transition rather than supporting it, since they may develop too slowly, with too little coordination to maximise customer benefits, or not at all.

More broadly, ENA considers that any changes to the National Electricity Rules (NER) arising from the ENRR should focus on enhancing principles and guidance as to the application of those principles. Matters of practical application are best left to the relevant guidelines. This approach is not new and reflects how much of the NER currently operates, with the Australian Energy Regulator (AER) responsible for developing and updating operational detail within a framework set by the NER. ENA

supports this division being preserved because guidelines can be developed and revised by the AER without the delay and cost of a rule change. This allows flexibility for the details of obligations to be recalibrated as circumstances, technologies and the AER's own compliance experience develop.

Finally, ENA would welcome the opportunity to better understand from the AEMC specific stakeholder concerns regarding NSPs' connections and/or facility access processes. This includes whether the matters raised are varied or common in nature, and whether they are concentrated in specific jurisdictions or NSPs, or are present across the national electricity market (NEM) more generally.

Connections and access applications can vary significantly, and these nuances should be considered in evaluating any need for change. ENA considers that amending the NER is unlikely to be a proportionate response to a potential problem, as any issues are more likely to arise from the practical application of the process across these varied circumstances, rather than from any deficiency in the framework.

ENA provides further detailed responses to the ENRR consultation questions in Attachment 1.

If you wish to discuss any of the matters raised in this response further, please contact Russell Pendlebury, General Manager, Regulation and policy at rpendlebury@energynetworks.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Dom Adams', with a stylized flourish underneath.

Dominic Adams
Acting Chief Executive

Attachment 1

1. Service provision should promote the long-term interests of customers

ENA is strongly supportive of changes to the distribution service classification framework to ensure that services are provided in the manner that maximises long-term customer benefits. This includes NSP participation in markets that may otherwise be considered contestable, where this is the most efficient means of delivering customer outcomes. This flexibility is important to facilitate a timely transition.

The distribution service classification framework has, to date, been organised around the principle of natural monopoly characteristics. Accordingly, the boundary between regulated and unregulated services has historically been determined by whether the service possesses natural monopoly characteristics. A consequence of this approach is that, absent natural monopoly characteristics, a service is presumed to be provided contestably.

Given the required pace of the energy transition, waiting for competitive markets to develop independently risks holding back the transition rather than supporting it, since they may develop too slowly or not at all. ENA therefore considers that a fit for purpose service classification framework would recognise that there are circumstances in which NSP involvement in contestable markets is in the long term interests of consumers. The AER has previously recognised a potential role for NSPs in such markets as part of regulatory reform opportunities to bolster productivity growth, for example, it said that:¹

...the urgency of the transition means we need to consider whether there are circumstances in which markets may be failing to deliver the required investment or where participation from networks can bring benefits such as improved productivity of the energy system which outweigh detriments...

ENA considers NSP involvement can enhance productivity where there are:

- economies of scope, where the NSP can deliver a service at lower or incremental cost by reusing existing assets, systems and workforce capacity – avoiding the cost of duplicating that capability, while increasing the speed of delivery, provided this reflects a genuine advantage rather than an ability to cross-subsidise from regulated revenues
- opportunities to better coordinate the uptake of a technology and its supporting infrastructure by internalising both within one entity to resolve a deadlock that would otherwise persist between separately incentivised parties
- externalities, where the service generates benefits (or costs) to parties beyond those transacting, such that private provision by a provider may fall below the socially efficient level because the party investing does not capture the full social benefit.

Importantly, these grounds for NSP involvement are distinct from the natural monopoly test in that they do not justify exclusive provision of the service by NSPs. Rather, they call for flexibility within the framework for measured, proportionate provision of these services by NSPs where appropriate,

¹ AER, *Letter to the Treasurer – regulatory reform opportunities*, August 2025, p 5.

provided competition is preserved rather than foreclosed, both for the right to provide the service and in its ongoing provision. In practice, this could involve:

- limiting the involvement of NSPs to the network-facing component of the service, with the customer- or market-facing component of the service continuing to be provided contestably
- requiring the AER to regularly review the role of NSPs in such markets, providing a clear off-ramp where circumstances change such that contestable provision best delivers customer outcomes.

To give effect to this flexibility, the factors that the AER must have regard to in making a service classification decision could be expanded to provide principles and guidance regarding when it is appropriate for NSPs to provide regulated services in contestable markets. This would be where:

- there is demonstrated evidence that competitive supply is not delivering efficient, scalable or equitable outcomes for the service in question, as opposed to the theoretical possibility that competition may not emerge
- NSP provision would produce demonstrable benefits to customers, such as lower cost service delivery, faster deployment or improved reliability, that would not be available, or available as quickly, through third-party provision.

Application of this guidance by the AER should include publishing its reasoning and how it balanced the relevant considerations.

Given the required pace of the energy transition, the AER should be mandated to make classification decisions, rather than retaining the discretion to not classify under clause 6.2.1(a) of the NER. A decision to classify a service as a non-distribution service should be accompanied by tangible guidance on future outcomes that illustrate the satisfactory development of the market and, by implication, what future circumstances would call for NSP involvement to expedite development of the market.

ENA also considers that this flexibility would reduce the need for NSPs to seek ring-fencing waivers to provide services in contestable markets. Waivers are, by design, a case-by-case exception to the general framework, granted individually and subject to ongoing review. A classification framework that reflects the circumstances described above offers a more enduring solution. It addresses the underlying question of when NSP involvement is appropriate, rather than requiring repeated waivers which require significant effort, time and cost to prepare, where speed is of the essence.

Where waivers continue to be used, ENA considers that they should be granted on a proportionate basis. NSPs should be allowed to conduct trials of sufficient depth and scale to inform significant reform such as future rule changes or classification decisions for emerging services. Waiver conditions should appropriately safeguard competition without imposing requirements that inhibit the extent to which the waiver can be informative.

While trials and ring-fencing waivers can help to inform future decisions on service performance, they should not in practice be treated as a necessary precursor to DNSPs providing new services, given the required pace of the energy transition.

2. ENRR rule changes should focus on enhancing principles and guidance

Where rule changes do arise from the ENRR, ENA considers that their scope should be confined to stating governing principles and guidance as to their application. The details of how these principles are implemented in practice should be left to guidelines developed and maintained by the AER. This approach is not new and reflects how much of the NER currently operates, with the AER given responsibility for developing and updating operational detail within a framework set by the rules.

ENA supports this division being preserved. Guidelines can be developed and amended by the AER without the delay and cost of a rule change. This allows the details of processes and obligations to be recalibrated as circumstances, technologies and the AER's own compliance experience develop. Moving implementation-level detail into the NER would trade this responsiveness for a form of durability that is not without cost. Obligations calibrated to today's circumstances would become materially harder to adjust as those circumstances change, particularly given how quickly the underlying technologies and market structures are evolving.

Reflecting this overarching principle, ENA does not consider that there are any current issues with cost allocation and the treatment of shared assets that warrant changes to the NER. The overarching framework remains sound and changes, if any, would be more appropriately managed through amended guidelines.

3. Further information is required in relation to connection and facility access processes

ENA notes the AEMC's commentary regarding stakeholder concerns about the potential for NSPs' connections and/or facility access processes to act as a barrier to entry to contestable markets. ENA would welcome the opportunity to better understand from the AEMC the specific stakeholder concerns regarding these processes. This includes whether the matters raised are varied or common in nature, and whether they are concentrated in specific jurisdictions or NSPs, or are present across the NEM more broadly.

Connections and access applications can differ significantly from one another. For instance, the network constraints at each location, the age and condition of existing plant and relevant technical requirements can all vary from case to case. Electric vehicle charging infrastructure illustrates this point:

- high-speed charging hubs, which have significant network impacts and may require augmentation to increase capacity, necessarily have longer application to construction timeframes given their complexity
- kerbside AC chargers have materially less network impacts and so a more straightforward approvals process can be applied.

NSPs must apply their technical expertise, tailored to the complexity of the request, to ensure that connections or access do not compromise system security or reliability – both for the connecting party and for other users of the network. It is important to consider the nuanced nature of connections and facility access when evaluating any potential problems.

Notwithstanding, ENA considers it is unlikely that a change to the NER would be a proportionate response to any potential problem. This is because any such problem would stem from the practical application of the processes to these varied circumstances rather than from the design of the rules themselves. Other avenues, such as efforts to harmonise connection processes, are likely to better address stakeholder concerns in this area.

23 July 2026

Alfredo Careaga
Project Lead
Australian Energy Market Commission

Dear Mr Careaga,

**Enabling distribution network service provider led electric vehicle charging infrastructure –
Consultation Paper**

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) Consultation Paper on the Enabling distribution network service provider led electric vehicle charging infrastructure rule change (ENA's rule change).¹

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

Australia's energy system is undergoing its most significant transformation in generations. Decarbonising transport is central to that shift but realising the benefits of electric vehicles (EVs) depends on consumers having access to convenient and affordable charging so they can charge when and where they need to. Too many Australians are currently excluded from that choice because public EV charging infrastructure (EVCI) is not available, affordable or convenient enough to support them.

This gap is holding Australia back. It is slowing EV uptake and creating an uneven playing field. For many people – especially apartment dwellers, renters, and those without off-street parking – owning an EV is simply not practical without reliable and cost-effective public charging. That is not equitable, and it is not efficient.

Australia currently faces a coordination challenge between EV uptake and charging infrastructure deployment. Without enough chargers, large subsets of the population will not adopt EVs. Without sufficient EV uptake, private investment in public charging remains constrained and only occurs with government support. Breaking this cycle requires a practical, scalable solution.

By enabling distribution networks to install, own and maintain kerbside EV charging using existing infrastructure – such as power poles – Australia can deliver faster, more affordable, and more widespread access to charging infrastructure in locations where it is needed. Under the proposed model, distributors would not sell electricity or charging services directly; rather, they would enable the infrastructure and provide open access, allowing retailers and charging providers to compete for customers - driving greater choice, innovation, and more competitive pricing.

Distribution Network Service Providers (DNSPs) are essential infrastructure providers with established planning, delivery and operational capabilities who can work alongside industry to roll out kerbside chargers at pace. By recognising EV charging as a regulated distribution service, DNSPs can leverage their existing workforce, resources and geographic presence to support a more comprehensive and efficient EVCI roll out.

¹ Australian Energy Market Commission, *Enabling distribution network service provider led electric vehicle charging infrastructure - Consultation Paper*, 25 June 2026

ENA's rule change proposes a targeted framework to enable this model by allowing distributors to provide EVCI as a regulated service. It is not mandatory, and it does not crowd out other approaches. Rather, it complements competitive market led investment by unlocking a fast, scalable, lower-cost pathway to deliver the infrastructure Australians need.

This is about fairness, affordability, and making the energy transition work for everyone.

Allowing DNSPs to contribute to EVCI in the Rules

ENA's rule change request proposes amendments to Chapter 6 of the National Electricity Rules (NER) to provide that, where a DNSP proposes to provide a service for the installation, maintenance and provision of access to EVCI using assets which form part of its existing distribution network, that service is to be classified as a direct control service (DCS).

The proposed rule would allow DNSPs, through their revenue reset processes, to nominate EVCI as either a standard control service (SCS) or alternative control service (ACS) for Australian Energy Regulator (AER) approval. This classification would allow DNSPs to recover efficient costs through regulated charges, where approved by the AER.

The current regulatory framework (including current distribution determinations) prevents DNSPs from playing this role as the installation, ownership and maintenance of electric vehicle chargers is not classified as a regulated distribution service (i.e. it is not a DCS).

In practice, this means DNSPs cannot install, own and maintain kerbside chargers as part of their regulated asset base and then make those assets available on an open-access basis to retailers and charging operators.

The public EVCI market is not expanding at a pace sufficient to support broad-based EV uptake, particularly in locations where commercial investment is likely to be constrained. While DNSPs are well placed to help address this gap, the current regulatory framework limits their ability to do so efficiently and at scale.

ENA's rule change proposes providing open access to kerbside EVCI at the point of supply, meaning retailers and charge point operators compete to provide the retail services for the charger. EVCI rollout by DNSPs under an open access model will promote retail competition at the point of supply among retailers and other commercial charging operators. This is intended to facilitate competition at each infrastructure point and reflects other electricity provisions, such as how retailers currently compete to provide retail electricity services to customers. An open access model is likely to lead to lower prices, innovation and improvements in the quality of supply of electric vehicle charging services for customers.

Recognising the market failure in EVCI availability

ENA considers there is a clear market failure in the provision of public EVCI. Public charging is not keeping pace with EV growth. In 2026 to date, Australia has experienced strong growth in EV uptake, with Q1 2026 sales increasing by 65% year on year.² Yet, there are approximately 40 EVs per public charging point, compared to a world average of 11.³

The disparity in public charging suggests EV ownership in Australia remains concentrated among households with access to home charging. Research from EV council found 93% of EV owners

² International Energy Agency, [2026 Global Report](#), May 2026

³ Ibid

surveyed have access to home charging.⁴ This creates an inequitable transition, where renters, apartment dwellers and households without access to at-home charging face structural barriers to participation and are unable to realise the benefits of EV ownership.

The Department of Climate Change, Energy, the Environment, and Water (DCCEEW) has recently also submitted a rule change request to the AEMC recognising the lack of public charging, alongside the development of a grant program to intervene. While these measures are an important step in addressing near-term gaps, they are time and scope limited and so do not provide an enduring framework to support the scale of investment required to meet growing demand for public EVCI and support the rapid and fair adoption of EVs.

ENA does not consider the NER should prescribe the specific locations or types of EVCI where market failure exists. Gaps in public charging availability vary significantly across jurisdictions, reflecting differences in local conditions, including government programs, population density, customer demographics, and market development to date.

Rather than prescribing a blanket approach, the framework should enable DNSPs to identify and propose targeted EVCI investments through revenue proposals, for AER assessment and approval. This approach supports efficient, location specific development aligned with a demonstrated need for charging infrastructure and consistent with existing regulatory oversight.

While it is clear there is generally a failure in the market to provide adequate and accessible public EVCI, it is challenging to quantify the specific costs and benefits of addressing this when the nature of the market failure exists across varying geographies and technologies. This may limit the value of an exhaustive quantitative assessment of costs and benefits. A qualitative assessment will also provide useful insights. Under the proposed rule the AER would only approve an investment in EVCI where it considers it is in the long-term interests of customers, and accordingly the AEMC should consider its assessment of the costs and benefits of the rule change in this light.

While the relative costs of regulated vs competitive deployment of EVCI should be taken into account, it is also important to consider the impact of different EVCI models on the level of competitive tension in the provision of EV charging services once the infrastructure is built. An open access model, as is proposed here, will facilitate greater competition in service provision as any energy retailer or charging provider can sell through it allowing competition at each location.

The alternative is a model where each charge point is tied to a single seller and in effect its own small monopoly on the provision of energy services. Where there is limited or no service competition, customers are likely to pay materially more in the retail cost of energy at that infrastructure point. An average EV customer would pay \$22 per year more for each additional c/kWh caused by limited competition for retail electricity services in the EVCI market.⁵ Over 10 years, a well utilised charger would cost its customers \$1,825 more for each additional c/kWh caused by limited retail service competition. When amplified across the energy system, this could have significant impact on long-term outcomes for customers.⁶

Ensuring regulatory oversight

ENA's proposed rule is purposefully designed with rigorous regulatory oversight, consistent with any other network expenditure process. DNSPs would propose cost recovery of distribution EVCI as

⁴ Electric Vehicle Council, *EV Ownership Survey 2nd Edition*, 2025

⁵ This analysis assumes the EV customer requires 2,200 kWh of energy per year, and charges solely from public EVCI.

⁶ This assumes a usage rate of 50 kWh/day over the 10 years.

either standard control services (SCS) or alternative control services (ACS) and the AER would assess and approve any such proposals in accordance with the NER. Any associated customer charges would be subject to the AER's established review and approval processes.

The proposed rule is opt-in. DNSPs would only propose to use existing network infrastructure to install EVCI where they identify a need to do so. Where the private market is already delivering sufficient public charging infrastructure in a given area, there is no requirement for DNSPs to provide EVCI and DNSPs would have less of a basis to propose additional investment in the proposed framework.

ENA's proposed rule includes the requirement for the DNSP to develop and publish a Deployment Strategy, explaining the planned deployment, facilitation of an open access model, and stakeholder engagement. The purpose of which is to ensure transparency and accountability regarding the rollout of DNSP-led EVCI, fostering collaboration between governments, market bodies, industry stakeholders and customers.

The proposed Rule also does not preclude the development of other models to roll out EVCI across the NEM. Nor does it prevent DNSPs from continuing to provide distribution services to facilitate EVCI to third parties as an unregulated or negotiated distribution service.

The proposed rule makes clear that Distribution EVCI Services do not include the sale or supply of electricity to electric vehicles. DNSPs would not provide retail services or sell electricity directly to electric vehicle charging customers. Electricity sales at the charging point would remain contestable.

EVCI market over time

EV uptake is driven by household and customer decisions. Factors such as vehicle prices, fuel costs and charging availability will influence when and where EV adoption occurs, making it difficult to predict the pace and distribution of future demand. This uncertainty reinforces the need for a flexible approach that allows industry to concentrate on local conditions and respond as the market evolves.

To date, public charging deployment has not kept pace with EV growth, and EV adoption remains materially constrained for consumers without at-home charging. Forecasts show EV growth will continue to accelerate, suggesting without intervention the gap between EVs and public charging will continue to grow, and so too will the disparity in accessibility between those who can and cannot access the benefits of EVs.

DNSP delivery of kerbside pole-mounted EVCI is one component of a broader mix of charging solutions required to support transport decarbonisation. ENA considers it is not for the rules to define how the EVCI market should evolve over time, but rather to enable DNSPs to contribute where appropriate through existing regulatory approval processes.

Allowing DNSPs to use existing network assets to deliver public charging can help address the coordination challenge between EV uptake and infrastructure availability. This complements market-led investment by adding an important pathway to deliver timely, efficient and more accessible charging infrastructure.

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Senior Regulatory Analyst via vbaikie@energynetworks.com.au.

Yours sincerely,



Dominic Adams
Acting Chief Executive