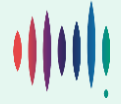


Facilitating EV Charging Infrastructure Rollout Under Commonwealth Grants

Submission to Australian Energy Market
Commission

DATE: 25/06/2026



Summary

Energy Consumers Australia (ECA) appreciates the opportunity to provide input to the consultation on *Facilitating electric vehicle charging infrastructure (EVCI) under Commonwealth grants*.

As the national voice for household and small business energy consumers, we advocate for a fair, affordable, and reliable energy system — one that meets everyone’s needs and leaves no one behind on the journey to net zero. In the context of this rule change proposal, it means ensuring that all consumers can use, charge, and pay for their electric vehicles (EVs) conveniently and fairly, unlocking benefits for themselves, the wider community, and the grid.

ECA supports the intent of this program and commends the Department of Climate Change, Energy, the Environment and Water (DCCEEW) for recognising the current challenges in the rollout of public EVCI and proposing measures to address them. Public charging infrastructure remains unevenly distributed, and many consumers, particularly those without access to home charging, are effectively locked out of the EV transition as a result. Government intervention to accelerate the rollout of public EVCI is therefore welcome and necessary.

On balance, provided the grant criteria are well designed and appropriately targeted, we consider that the benefits of this program are likely to substantially outweigh the costs. We consider that the grant criteria — and, in particular, the identification of priority locations for investment — will be the most consequential factor in determining whether this program delivers good outcomes for consumers.

To ensure funding is directed to areas of greatest need while supporting efficient delivery through a competitive market, the development of these criteria should draw on input from distribution network service providers (DNSPs), state and local governments, and charging point operators (CPOs). Incorporating multiple perspectives will help ensure investment decisions reflect network capabilities, local planning priorities, competitive market dynamics, and, most importantly, consumers’ current and future charging needs.

We encourage DCCEEW to continue working closely with relevant stakeholders to ensure these criteria are well designed, transparent, evidence-based and subject to ongoing review so that investment is directed to locations where it delivers the greatest benefit to consumers.

Introduction

EVs offer one of the greatest opportunities for households to significantly reduce their energy costs. ECA's *Stepping Up* report shows that by 2030, households with an EV could save on average \$1,440 per year.¹ Importantly, these benefits extend beyond EV owners themselves, reducing electricity bills for all consumers through better network utilisation.²

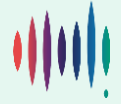
The recent rise in petrol prices has driven more Australians toward EVs as a way to cut costs and reduce reliance on imported fuel.³ Battery electric vehicles accounted for 12% of new vehicle sales in the first quarter of 2026, up from 6% in the same period in 2025, representing a substantial year-on-year increase.⁴

¹ Energy Consumers Australia, 2023 – [Stepping Up Report](#) p. 12

² CSIRO, 2023 – [Consumer impacts of the energy transition: modelling report](#)

³ University of Technology Sydney, 2026 – [Fuel prices are driving more Australians to EVs, and secondhand cars are in high demand](#)

⁴ Australian Automobile Association, 2026 – [Electric Vehicle Index](#)



ECA's Consumer Energy Report Card (CERC) survey reinforces this trend, finding that 41% of consumers are more likely to consider an EV because of recent fuel price rises. Beyond cost, the lack of access to home charging and the limited availability of public chargers remain among the main reasons consumers — particularly those renting or living in apartments — are reluctant to make the switch.⁵ For these households, confidence that they can charge conveniently and affordably is a prerequisite for making the switch.

This makes the availability of public EVCI critical. Without it, entire consumer cohorts are locked out of the benefits of EV ownership,⁶ preventing them from making the switch and realising significant savings.

We therefore welcome DCCEE's intervention in this space. In particular, we support the measures proposed to remove structural barriers to deployment — including capping facility access fees, improving the transparency of network capacity information, and streamlining connection processes for CPOs. We also see significant potential in this program to support collaboration between governments, networks, and local councils to direct investment where chargers are most needed, provide chargers to underserved communities, and address regional and remote blackspots. Done well, this program can deliver real benefits to consumers today while generating the evidence and insights needed to inform a more comprehensive and consumer-centred approach to EVCI rollout in the future.

That said, we have a number of concerns with the current proposal. These are set out below and addressed in more detail in our responses to specific questions.

This is a program to support existing and future EV drivers, not networks

There are risks associated with DNSPs being responsible for identifying suitable sites for EVCI. DNSPs have limited insight into transport planning, travel patterns, local community needs, and charging needs. The location of EVCI should be determined primarily by where consumers need and value charging services, while taking network impacts into account. It should not be driven by what is most *convenient* for electricity networks, with consumer needs treated as a secondary consideration.

DNSPs are also structurally incentivised to maximise the number of EVCI assets delivered, as cost recovery through the regulated asset base is low-risk and largely independent of utilisation. Unlike user-pays models, where returns depend on actual demand, DNSPs can recover prudent expenditure through regulated revenues regardless of whether infrastructure is well-used. This creates a bias toward building more infrastructure rather than the right infrastructure, and does not incentivise prioritising locations that best meet consumer needs.

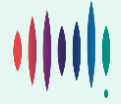
DCCEE should therefore reconsider the role of DNSPs in this program. DNSPs have an important role to play, but it should be limited to providing network impact assessments as one input into site selection, rather than leading that process. Site selection should instead follow a layered approach that considers three equally important factors: consumer needs, local planning suitability, and network feasibility.

Consumer needs can be identified through factors such as population density, housing type, housing tenure, vehicle ownership, and access to off-street parking. DCCEE, state governments, and local governments are better placed to establish this layer and develop priority maps identifying areas where public charging is likely to deliver the greatest consumer benefit. Similar approaches have been adopted in programs such as the NSW EV Kerbside Charging Grants.⁷

⁵ ECA, 2025 – [Consumer Energy Report Card](#)

⁶ HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#)

⁷ NSW Government, [EV Kerbside Charging Grants \(Round 2\) Priority Map](#)



Local councils are best placed to identify sites that are suitable from a land-use perspective, taking into account factors such as parking availability, safety, accessibility, nearby amenities, and community acceptance. Evidence supports the importance of getting this right. Research led by UNSW and funded through an ECA grant found that dedicated parking per charging port increases the number of charging sessions by 229%, and that utilisation is significantly higher when chargers are located close to apartments and shops.⁸ This approach is more likely to deliver charging infrastructure that is well utilised and provides greater value to consumers. By identifying locations with strong underlying demand and suitable local conditions, it also improves the commercial viability of chargers, attracts private investment, and reduces the cost burden on consumers.

Should DCCEEW consider that DNSPs are indeed best placed to be the planning provider, we strongly recommend embedding strong criteria into the site identification plans, to ensure that investments target locations where consumers need and value charging infrastructure. Additionally, DNSPs should be required to demonstrate active collaboration with, and obtain formal sign-off from, local councils before taking those plans forward.

The interrelationship between different types of public EVCI

We note that this program does not plan on funding DC metro charging as it is considered the most commercially viable option. While we understand why DCCEEW intends to restrict DNSP involvement in this space and is focused on AC charging, we recommend that grant decisions take into account the full picture of existing and planned charging infrastructure in each area.

UNSW research funded through an ECA grant found that consumer preference at kerbside locations skewed clearly toward higher-power DC chargers (30–50 kW) over the slower AC chargers (7–11 kW) that currently dominate kerbside deployment. On average, DC charger sites were used four times a day compared to once a day for AC sites and delivered five times more energy per day. Importantly, their higher throughput also makes them more space-efficient, requiring fewer dedicated EV parking spaces — a significant advantage in dense urban areas where on-street parking is contested. This means that despite higher upfront costs, DC chargers can represent the most economic option for kerbside charging in certain locations, particularly near apartments or services with one-to-two hour dwell times.⁹

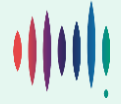
We therefore recommend that DCCEEW, in defining priority areas for this grant, work with local councils to consider the socioeconomic characteristics of each community — including whether residents are more likely to prioritise speed and convenience over cost — as well as the presence of existing and planned 30–50 kW DC chargers in the area, to determine the most suitable mix of infrastructure for each location.

Reliability and the consumer experience after rollout

There should also be minimum requirements for charger performance, operation and user experience after rollout. Providing a reliable and accessible service is critical to building consumer confidence in EVs. Requirements of this kind have already been implemented in other grant programs — for instance, the NSW EV kerbside charging program includes grant criteria covering uptime, real-time reporting of charger availability, transparent and consistent pricing and payment requirements, and consumer support and

⁸ The Conversation, 7 April 2026 – [Growing EV popularity is leading to queues at fast chargers. Could a kerbside charger network help?](#)

⁹ *ibid*



maintenance response times.¹⁰ We recommend DCCEEW adopt similar requirements as a condition of this grant program.

However, there is growing evidence that uptime alone is an insufficient measure of the consumer experience. Research from the University of Western Australia found that reported uptime figures significantly overstate actual charger reliability — in comparable markets, the rate at which drivers could successfully charge was found to be as low as 75–83%, despite networks reporting 95–98% uptime.¹¹ A charger blocked by an ICE vehicle, with a failed payment system, or other faults that prevent a charging session from commencing would still pass the uptime test — but would leave a driver without a charge.¹²

We therefore recommend that DCCEEW go beyond uptime and require grant recipients to collect and report user feedback, usage data, and real-world customer experience measures alongside technical performance metrics. Assessing infrastructure against these consumer-centred indicators will help identify emerging needs, improve service quality over time, and support better planning and prioritisation for future infrastructure deployment.

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?

We agree with the problem statement as defined by DCCEEW. Our previous submissions highlighted that EV adoption and the availability of public chargers are an ongoing dilemma within the EV space: more chargers are needed to encourage and support EV adoption, which is precisely what incentivises private investment in public charging infrastructure, thus creating a “chicken and egg” problem.¹³

Evidence suggests this challenge is already affecting the distribution of charging infrastructure across Australia. A report by HoustonKemp, commissioned by ECA, found that public EV charging infrastructure is unevenly distributed, with significant gaps between metropolitan and regional areas.¹⁴ This likely reflects the geographic distribution of EV uptake, which varies across jurisdictions and is concentrated in metropolitan areas where incomes are generally higher and average commute distances are shorter.¹⁵ This means that entire cohorts of consumers (renters, people living in apartments, those without private parking, as well as regional and rural communities) who tend to be more reliant on public chargers are locked out of the EV transition.

ECA has been a strong advocate for an equitable EV transition that provides a public EV charging network that effectively serves all demographics and community segments. In this regard, our most recent CERC survey found that lack of access to charging at home and insufficient public charging infrastructure remain among the most significant barriers to EV adoption. These barriers are particularly pronounced for renters and apartment residents. Previous research found that 13 per cent of Australians are unable to install EV charging infrastructure because they rent their home, while a further 10 per cent are unable to do so

¹⁰ NSW Government, 2024 – [Electric Vehicle Kerbside Charging Grants \(Round 2\) – Guidelines](#)

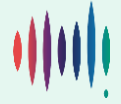
¹¹ University of Western Australia, 2025 – [Many public EV chargers are unusable - despite being 'online'](#)

¹² *ibid*

¹³ See our submissions to the [Inquiry into infrastructure for electric and alternative source vehicles in NSW](#), and to the [Victorian Inquiry into Electricity Supply for Electric Vehicles](#)

¹⁴ HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#), pp. i-16

¹⁵ *ibid*



because they live in an apartment building.¹⁶ Renters are disproportionately affected: 31 per cent of private renters and 21 per cent of people living in public or community housing identified access to charging infrastructure as a barrier to purchasing an EV, compared with only 4.5 per cent of owner-occupiers and mortgage holders.¹⁷

The diversity of consumer circumstances must be taken into account when designing a public EV charging network that serves everyone's needs.¹⁸ This is especially important as Australia is still working toward establishing an "access layer", meaning the infrastructure required to build consumer confidence, both in terms of EV investment and ability to complete a journey.¹⁹

That said, we recognise that this program is intended to help kick-start the market and cannot resolve the issue on its own. For this reason, we recommend identifying priority areas in close collaboration with local councils. We provide further detail on this in our response to Question 3.

2. Do you agree that there is a market failure for deployment of EV charging in regional and remote blackspots?

As noted above, there are currently areas of Australia that are not being adequately served by the private EV charging market. While it is reasonable for private market participants to prioritise locations where they can achieve a commercial return, this leaves some consumers without adequate and convenient charging options. It also reinforces consumer hesitation about switching to an EV, particularly in communities where public charging infrastructure is limited or unreliable.

This issue is especially acute in regional and rural areas. Public chargers in these locations are likely to have lower utilisation rates than chargers in metropolitan areas, making them less commercially attractive for private investment. At the same time, regional and rural consumers often need to travel longer distances and are therefore more likely to be concerned about vehicle range and access to charging.^{20 21} Research shows that 40% of people in rural and regional Australia are concerned about driving range, compared with 26% of people in urban areas.²² This contributes to households in regional areas being less likely to own an EV or to consider one as their next vehicle purchase.²³

We see a clear gap between regional/rural areas and metropolitan ones, highlighting the market's inefficiency in providing infrastructure to all consumers. ECA firmly believes that the EV transition will be successful only if all consumers can participate, regardless of where they live in Australia, which is why it is crucial to address this market failure and avoid creating another cities vs regional Australia divide.

3. Do you consider the following DNSP processes and prices to be barriers to efficient EVCI deployment:

a. Connection processes, including timeframes and costs

Evidence suggests that DNSP connection processes can present a significant barrier to the efficient deployment of EV charging infrastructure. Existing research highlights considerable variation in DNSP performance across jurisdictions. For example, the Electric Vehicle Council found that Victorian DNSPs were among the poorest-performing networks nationally, with no dedicated teams to support public EV

¹⁶ Consumer Policy Research Centre, 2022 – [The barriers and potential enablers of electric vehicle uptake in Australia](#)

¹⁷ *ibid*

¹⁸ *Ibid*, p. 15

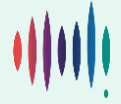
¹⁹ HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#), p. 15

²⁰ Consumer Policy Research Centre, 2022 – [The barriers and potential enablers of electric vehicle uptake in Australia](#)

²¹ ECA, 2025 – [CERC](#)

²² Consumer Policy Research Centre, 2022 – [The barriers and potential enablers of electric vehicle uptake in Australia](#)

²³ *Ibid*.



charging connections and comparatively weak performance in relation to connection timeframes and the provision of second lines of supply required for charging infrastructure.²⁴

These concerns are consistent with findings from the Victorian Government's recent EV Charging Regulatory Impact Statement, which concluded that “*more action is needed to ensure that when a company wants to install a new EV charger, it can be done at a reasonable speed and price, through a consistent and fair process*”.²⁵ Delays and inconsistencies in connection processes can slow the rollout of charging infrastructure and create inequities between consumers depending on where they live and which distribution network serves their area.

From a consumer perspective, access to public charging infrastructure should not depend on the efficiency of individual DNSP processes. Consumers across Australia should benefit from a timely and coordinated rollout of charging infrastructure regardless of jurisdiction. More generally, HoustonKemp’s research emphasises that expedited approvals on fair terms are critical to support the delivery of a public charging network that is in consumers’ best interests.²⁶ To this effect, the report suggests requiring DNSPs to approve connection applications within certain timeframes and expedite approvals for poles identified as suitable.²⁷

b. Site identification processes

Site identification processes can be a significant barrier to the efficient deployment of public EV charging infrastructure. A key challenge is the lack of consistent and transparent information on network capacity and constraints across DNSPs. Access to this information is critical when assessing the viability of potential charging locations. However, approaches vary considerably between DNSPs. Some networks, such as Essential Energy, provide publicly available hosting capacity maps and network information that help identify suitable locations.²⁸ In contrast, other DNSPs provide limited visibility of network conditions, meaning charging providers often do not know whether sufficient network capacity exists to support their projects until after they have entered the connection process and paid application fees.²⁹

ECA has consistently advocated for greater network data transparency including through our Integrated Distribution System Planning (IDSP) rule change proposal.³⁰ Access to information on available network capacity at the low-voltage level would enable charging point operators, councils, and governments to make more informed investment decisions, reduce development risks and avoid pursuing sites that are unlikely to be viable.³¹

To address this issue, in line with IDSP rule change, DNSPs should be required to publish and maintain publicly available information on network capacity at the low-voltage transformer level. Improved transparency would support more efficient site selection, reduce project development costs and help direct investment to locations where infrastructure can be deployed most effectively.³²

²⁴ Electric Vehicle Council, 2024 – [State of Electric Vehicles 2024](#), pp. 56-57

²⁵ Victorian Department of Energy, Environment and Climate Action, 2026 – [EV Charging Regulatory Statement](#), p. 10

²⁶ HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#), p. iii

²⁷ *ibid*

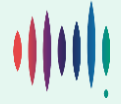
²⁸ Essential Energy – [Network Capacity Map](#)

²⁹ Victorian Parliament, [Inquiry into the Supply of Electricity in Victoria for Electric Vehicle Charging](#), p. 21.

³⁰ ECA, 2025 – [Integrated Distribution System Planning \(electricity\) rule change request](#). This rule change is now being progressed by the AEMC under the following name: Enhancing Distribution Network Planning and Reporting.

³¹ *Ibid*, p. 5

³² HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#), p. 46.



In addition, DNSPs possess valuable information about the condition and suitability of network assets, including power poles that may be capable of hosting kerbside charging infrastructure. Proactively identifying and publishing information on suitable assets could further streamline deployment, reduce assessment costs and accelerate the rollout of charging infrastructure in areas where consumers need it most.³³

c. Facility access fees

Access fees for pole mounted charging infrastructure are currently unregulated.³⁴ This can result in significant differences in fees between DNSPs, limited transparency regarding how fees are determined, uncertainty and significant challenges for third parties seeking to invest in pole-mounted EV charging.

Given their monopoly position, DNSPs should have a primary role in facilitating efficient deployment of EV charging infrastructure through transparent network information, efficient connection processes and fair access arrangements. Access fees should be cost-reflective, transparent and applied consistently to provide investors with confidence and minimise barriers to entry.

Question 3: Other Benefits

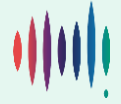
Do you have any views on the proponent's assessment of the benefits of the funding program beyond emissions reduction, including the potential for it to provide insights to inform an enduring market design for EVCI?

We agree with DCCEEW's assessment of the benefits of the program. Capping the facility access fees that DNSPs may charge, making information regarding EVCI-suitable sites publicly available, as well as improving connection processes, should alleviate the main barriers currently slowing the timely rollout of public chargers. However, we do believe that additional factors should be taken into consideration to effectively minimise consumer costs. We recommend:

- Adopting a three-layer approach to site identification, to avoid CPO refusal of a DNSP-selected site automatically leading to DNSP delivery as a provider of last resort. Those sites would be identified by overlapping locations where consumers have expressed a need for chargers, locations where parking and local planning conditions are suitable, and those where poles, network access and capacity can support efficient deployment. This would leverage council and network expertise, while also ensuring that consumer preferences and needs are embedded in the program.
- Including a 'priority area' criterion within the grant program. A priority area would be defined through market testing and demonstrate strong consumer need and local government engagement. Without it, a DNSP may identify a site that is technically suitable and forecasting a competitive cost, despite there being limited evidence of genuine consumer need. There is also a risk that kerbside AC is not the most appropriate solution for that location.
- Involving local governments in site selection is essential for ensuring that community needs and preferences are taken into account. This will determine whether those chargers are effectively

³³ HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#), p 47

³⁴ Victorian Government. (2026). [EV Charging Regulatory Statement](#), p. 12.



utilised or if they end up standing idle. This has been well-evidenced overseas, notably in California and the Netherlands.³⁵

Finally, the French 2017-2020 charger rollout, led by regional public energy authorities, provides an encouraging example in which public intervention helped kick-start the private market.³⁶ During that time, tens of thousands of chargers were deployed,³⁷ with private market participants later expanding the infrastructure. While not comparable in population or size, we do believe that DCCEE's program can similarly inform and support an enduring market design for public EVCI in Australia.

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?

Yes, we consider it appropriate for some of the costs of public charging infrastructure to be funded from all electricity consumers. Modelling done for ECA by CSIRO demonstrated that increased electric vehicle adoption reduces rates for all electricity consumers.³⁸ In California, where EV adoption is significantly more advanced than in Australia, it has been overwhelmingly demonstrated that increased electricity sales from EV charging have helped spread fixed electricity system costs across a larger volume of electricity sales, reducing average electricity costs for all.³⁹ These savings are in the billions of dollars, with EV drivers in three of the top utility service territories having contributed about \$1.7 billion (AU\$ 2,42 billion) more in revenues than associated costs over the past decade, driving rates down for all consumers.⁴⁰ Accordingly, as long as increased public charging increases EV adoption, and the benefits from that adoption are lower than the incremental cost placed on all electricity consumers, it is in all consumers interest to help them invest in public charging, recognising they are likely to receive a long-term benefit.

More broadly, greater EV uptake can contribute to lower transport emissions, improved air quality, and more efficient utilisation of electricity network assets. For these reasons, we consider it reasonable, within the context of this specific funding program, for some of the residual costs of enabling public charging infrastructure to be funded through a combination of government funding and contributions from electricity consumers. This is particularly the case where charge point operators and government grants fund a substantial proportion of project costs and where the broader benefits delivered to consumers outweigh any incremental cost impacts.

Our support is, however, contingent on the adoption of strong project selection criteria and safeguards to ensure that investments are directed towards locations where there is a demonstrated public benefit and consumer need. Careful identification of priority areas, taking into account both current and future

³⁵ Energeia, 2026 -- Consumer impacts of different EVCI funding models (Forthcoming report).

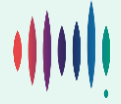
³⁶ HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#), pp. 66-67

³⁷ *Ibid.*

³⁸ CSIRO, 2023 – [Consumer impacts of the energy transition: modelling report](#)

³⁹ Natural Resources Defense Council (NRDC), 2022 – [Electric Vehicles Are Driving Electric Rates Down: Updated and Expanded](#), pp. 1-4

⁴⁰ *Ibid.*, p. 1



consumer demand as well as local conditions, can significantly influence charger utilisation, CPO participation and, ultimately, the costs borne by consumers.

A number of trade-offs must indeed be balanced in order to maximise consumers' long-term benefits, which is why ECA has been undertaking modelling to assess the bill impacts of different EVCI funding models. We intend to collaborate with the AEMC and DCCEEW to clarify these trade-offs and ensure that all consumers benefit from the rollout of public charging infrastructure.

Given that Australia is still in the early stages of public charging deployment, this program also presents an important opportunity to generate evidence on the costs, benefits and consumer outcomes associated with different funding approaches. These insights can help inform the development of a more efficient, equitable and consumer-focused long-term market design for public EV charging infrastructure.

Question 5: Proposed DNSP Recovery of Residual Costs

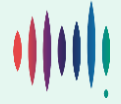
Do you agree with how the rule change request proposes that residual costs (i.e. net of government funding) for approved EVCI projects be recovered by DNSPs, including the proposals to:

- 1. Allow a DNSP's RAB to be adjusted to include capex for approved EVCI projects? If not, why?**
- 2. Allow a DNSP's RAB to be adjusted to include opex for approved EVCI projects for the first five years? If not, why?**
- 3. Treat any ongoing opex in subsequent regulatory control periods in the same way as opex for standard control services under the NER framework? If not, why?**

Overall, we consider the proposed cost-recovery approach acceptable for the purposes of this program, provided it is supported by strong safeguards, transparency and regulatory oversight. As noted earlier, EVs can deliver system-wide benefits by improving utilisation of the electricity network and placing downward pressure on electricity prices for all consumers, including those who do not own an EV. In this context, it is reasonable for some costs associated with enabling public EVCI to be socialised, given the broader net benefits these investments can deliver to consumers as a whole.

We recommend that the rules are updated to require the AER to monitor and collect detailed information on all approved EVCI projects, including the respective contributions of DNSPs and CPOs, the nature of the works undertaken, utilisation outcomes, and the efficiency of expenditure on a quarterly basis. This evidence base is essential to ensure that prudent, targeted capital and operating expenditure is recovered from consumers, that future outlays of network revenues to support EVCI are well-targeted, and that DNSPs are not incentivised to undertake inefficient or poorly targeted investment.

While the program design gives DCCEEW responsibility for determining approved projects and associated recoverable capex and opex amounts, the AER must remain involved in approving the inclusion of these costs in the RAB and in regulated revenues. This is a core regulatory function and a key consumer safeguard. AER oversight is necessary to ensure that network expenditure is efficient, justified, transparent, and aligned with the long-term interests of consumers.



Question 7: Other Changes to the National Electricity Rules

Do you agree with the proposals that:

1. EVCI connection works should not be classified as connection services under the NER? If not, why?

As noted above, there are a number of issues with current site identification and connection processes, particularly due to the current lack of transparent information on network capacity, constraints or suitable poles for hosting EV charging infrastructure. This issue will be partly addressed through ECA's IDSP rule change, which will require DNSPs to provide better information about network capacity and support more informed planning.

Facilitating connection works for EV charging infrastructure is likely to be one of the main roles DNSPs play in the rollout of public EVCI. Under the current program design, DNSPs would be responsible for identifying suitable sites, seeking approval for grant funding, and undertaking the capital works needed to make those sites EVCI-ready. Hence, the focus should be on ensuring that these DNSP activities are subject to appropriate oversight, to help accelerate the rollout of public charging infrastructure, which is a key objective of the program.

In this regard, we firmly believe that the grant criteria and associated safeguards are particularly important, as consumers should not be exposed to the costs of speculative investment or poorly targeted infrastructure. These considerations should be reflected in DCCEE's grant assessment criteria and the identification of priority areas for investment, to ensure that DNSP-led make-ready and connection works target locations which have been identified through transparent planning processes, with input from councils and local communities, and where there is demonstrated consumer need.

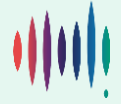
Subject to these conditions, and for the purposes of this program, we consider it appropriate that EVCI connection works are not classified as connection services under the NER. This approach provides the flexibility needed to deliver targeted, grant-funded infrastructure while ensuring that consumers are protected from unnecessary or inefficient network expenditure.

Question 9: End of Asset Lives

What do you think should happen with the EVCI assets, that DNSPs may be responsible for installing under the different proposed funding models, at the end of the EVCI's life (e.g. should DNSPs be able to replace the EVCI)?

International experience suggests that DNSP ownership should be permitted only as a targeted and temporary response to market failures. In the European Union, DNSPs are not allowed to own, develop, maintain, or operate EVCI, except under specific circumstances. Provided that "*other parties, following an open, transparent and non-discriminatory tendering procedure that is subject to review and approval by the regulatory authority, have not been awarded a right to own, develop, manage or operate recharging points for electric vehicles, or could not deliver those services at a reasonable cost and in a timely manner*",⁴¹ Member States may allow DNSPs to own, develop, manage or operate charging points. It also

⁴¹ European Union, 2019 – [Directive – 2019/944, Article 33\(3\) \(a\)](#)



requires the regulator to approve the tendering conditions after an *ex ante* review. The DNSP is then allowed to manage charging points, allowing third-party access and without discriminating between users.⁴²

France has narrowed this exemption further when translating it into its national law, with DNSPs requiring a specific exemption to be delivered by the French Energy Regulatory Commission (CRE) and for a duration of five years.^{43, 44} At the end of this period, market interest is reassessed through a public consultation, with charging points being transferred to third-party participants when the exemption is not renewed.⁴⁵ DNSPs are then compensated for the residual value of their investment.⁴⁶

We consider this to be a useful model for Australia. DNSP ownership of EVCI should be subject to periodic review to determine whether the underlying market failure persists and whether competitive providers are willing and able to provide the service. Accordingly, we recommend that the AER undertake a review of DNSP-owned EVCI at least every five years. Where there is sufficient commercial interest, the infrastructure should be transferred or sold to competitive providers through a transparent process. As highlighted in HoustonKemp's report, while this warrants further investigation, this could take the form of a mandated sale, either every five years, or at the AER's request, with appropriate compensation provisions with regards to the residual value of those public EV charging assets.⁴⁷

Conclusion

ECA appreciates the opportunity to provide input to the consultation on the proposed rule change to facilitate electric vehicle charging infrastructure under Commonwealth grants.

We encourage the AEMC to support the overall intent of this program as it represents a meaningful step towards a more accessible and equitable public charging network for all consumers. In doing so, we encourage the AEMC to ensure that the final framework includes appropriate safeguards, transparency and oversight so that the program delivers long-term benefits for consumers while minimising the risk of inefficient or poorly targeted expenditure.

ECA would welcome the opportunity to discuss this submission further and looks forward to continued engagement with the AEMC and DCCEEW on this important program.

For any questions or comments about our submission, please contact Elham Hajhashemi at elham.h@energyconsumersaustralia.com.au.

Yours sincerely

A handwritten signature in blue ink that reads "Brendan French".

Dr Brendan French
Chief Executive Officer

⁴² *Ibid*, (3)(b), (c)

⁴³ HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#), p.40

⁴⁴ French Energy Code, 2021 – [Article L353-7](#)

⁴⁵ HoustonKemp, 2025 – [Creating accessible and affordable public EV charging networks for Australia](#), p.40

⁴⁶ *Ibid*.

⁴⁷ *Ibid*, p. 51

The national voice for residential and small business energy consumers



PO Box A989,
Sydney South NSW 1235
T 02 9220 5500

energyconsumersaustralia.com.au