Ms Anna Collyer
Chair
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2001

25 June 2026

Dear Ms Collyer,

**Facilitating EV charging infrastructure rollout under Commonwealth grants**

ENGIE Australia & New Zealand (ENGIE) appreciates the opportunity to respond to the Australian Energy Market Commission's (Commission) consultation paper on facilitating electric vehicle (EV) charging infrastructure rollout under Commonwealth grants.

The ENGIE Group is a global energy operator in the businesses of electricity, natural gas and energy services. In Australia, ENGIE operates an asset fleet which includes renewables, gas-powered generation, and battery energy storage systems. ENGIE also provides electricity and gas to retail customers across Victoria, South Australia, New South Wales, Queensland, and Western Australia.

ENGIE supports the acceleration of electric vehicle charging infrastructure (EVCI) and agrees that reliable and convenient public charging will be an important contributor to the continued growth in the uptake of EVs in Australia. The private sector has been investing in EVCI to respond to consumer demand. For example, ENGIE has previously participated in an ARENA trial that delivered 55 fast-charging EVCI sites across metropolitan areas.[1]

In this context, ENGIE is concerned that the proposed rule change request will not meet the long-term interests of energy consumers. Embedding a central role for distribution network service providers (DNSPs) in the selection, ownership, and installation of EVCI sites risks distorting the competitive EVCI market. Allowing DNSPs to add costs incurred under the program into their Regulatory Asset Bases (RABs) may place unnecessary and inefficient costs on energy consumers, even if they do not own an EV or use public charging infrastructure.

ENGIE supports the key recommendations listed in the joint submission led by Nexa Advisory, particularly in relation to facilitating a market-led response to EVCI investment and limiting DNSPs to an enabling role.[2]

[1] ARENA, ENGIE Future Fuels Public Fast Charging, available at; https://arena.gov.au/projects/engie-future-fuels-public-fast-charging/

[2] Nexa Advisory 2026, Joint response to DCCEEW's Accelerating Electric Vehicle Charging Program design consultation paper, 25 June.

While there is concern about the proposed scope of DNSPs' role in this market, as noted in the joint submission, there is broad support for improved coordination, connection acceleration, and targeted public support for EVCI.[3]

In the remainder of this submission, ENGIE provides additional feedback beyond that included in the joint submission led by Nexa Advisory.

## Recent market developments may reduce the relevance of the problem statement

ENGIE has reservations around the problem statement outlined in the rule change proposal, which is that customers are hesitant to purchase EVs without EVCI, and investors are hesitant to deploy more EVCI with low EV uptake. Since the announcement of the Australian Government's 'Accelerating EV Charging Program' in September 2025, the rate of sales of EVs in Australia have increased significantly, particularly in the months following the outbreak of conflict in the Middle East and associated global fuel supply chain disruptions.

EV sales as a proportion of new vehicle sales have been consistently achieving records in 2025 and 2026, with EV sales most recently representing almost 30 per cent of new vehicle sales in May 2026.[4] In this context, the supposed 'chicken and egg problem' may be less relevant than in mid-2025, as other factors have arisen that lessened Australians' hesitancy to purchase EVs. ENGIE suggests that the September 2025 survey conducted by the Behavioural Economics Team of the Australian Government (BETA) on EV purchasing frictions referred to in the rule change request[5] is unlikely to continue to hold true amongst consumers in June 2026.

The rule change request highlights several factors that may be hampering the deployment of EVCI, including site identification, connection processes and DNSP infrastructure leasing arrangements.[6] ENGIE contends that these barriers could be addressed through alternative policy interventions that do not distort competitive markets and impose costs on electricity consumers. For example, reforms could be focused on streamlining connection assessments, harmonising DNSP requirements, improving visibility of network capacity and connection costs, network tariff design, and establishing clearer arrangements for access to network infrastructure. When assessing the rule change request, ENGIE asks that the Commission consider alternative policy options that do not require the integration of funding into the National Electricity Rules.

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[3] Ibid, p. 2.

[4] Electric Vehicle Council 2026, Electric Vehicles Nudge 30% Sales Share as Tesla Model Y Becomes Australia's Best-Selling Car, Blog, 3 June, available at; https://electricvehiclecouncil.com.au/media-releases/electric-vehicles-nudge-30-sales-share-as-tesla-model-y-becomes-australias-best-selling-car/

[5] Department of Climate Change, Energy, the Environment and Water 2026, Rule change request: Accelerating Electric Vehicle Charging Program, 28 April, p. 7.

[6] Ibid, p. 7.

## Treatment of regional blackspot areas

ENGIE acknowledges there may be blackspots in remote and regional areas that could be addressed to improve driver confidence for long-distance journeys and tourism. However, ENGIE does not believe that this issue should be characterised as a market failure. Investor hesitation is more accurately attributed to a combination of coordination challenges, early-stage market uncertainty, stranding risk, and policy settings. These factors have been consistently identified across numerous reviews of EV charging infrastructure, including the most recent inquiry conducted by the Victorian Parliament.[7]

ENGIE contends that the proposed approach for the regional blackspot design appears overly focused on DNSPs' identifying sites that align with the location of their network assets. As noted in the Nexa Advisory joint submission, the sites that are most efficiently located with network assets may not be sites that are most suitable for local drivers or travellers.[8] ENGIE provided similar feedback to the Australian Energy Regulator (AER) in its submission on the Citipower, Powercor, and United Energy ring-fencing waiver application for an EVCI trial, highlighting the risk of DNSP investment in locations that are optimised to ease network congestion rather than in areas with demonstrated consumer demand.[9] ENGIE continues to advocate for a market-led approach that is based on consumer demand and maximises utilisation of investments.

## Electricity consumers should not be burdened with funding the program

ENGIE notes that the rule change request proposes that EVCI-related costs would enter DNSPs' RABs and be recoverable from electricity consumers. While the Department models the maximum annual bill impact as less than $2 per customer in 2029, ENGIE questions whether it is appropriate for electricity consumers to be burdened with additional network costs that are unrelated to their electricity supply. While the network connection and the underlying facilitation of public charging may involve legitimate DNSP involvement, the charging asset itself is not a natural-monopoly asset and there is an existing and largely well-functioning market for investment in EVCI.

In its submission to the AER on the Citipower, Powercor, and United Energy ring-fencing waiver application, ENGIE noted that DNSPs can support the uptake of EVCI without directly participating in contestable services.[10] For example, DNSPs could take a leading role in improving access to the network for EVCI projects and streamlining connection processes.

While a market-led approach to EVCI investment with DNSP facilitation is preferable, ENGIE notes that government initiatives to procure private sector co-funding can also help to address gaps in investment

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[7] Parliament of Victoria: Legislative Council Economy and Infrastructure Committee 2026, Electricity supply for electric vehicles, June, p. 71.

[8] Nexa Advisory 2026, Joint response to DCCEEW's Accelerating Electric Vehicle Charging Program design consultation paper, 25 June, p. 6.

[9] ENGIE 2025, Submission to Ring-fencing waiver application for an EV charging infrastructure trial from CitiPower, Powercor, and United Energy – Consultation paper, 13 June, p. 2. Available at; https://www.aer.gov.au/system/files/2025-06/Engie%20–%20Submission%20to%20CPU%20ring-fencing%20waiver%20for%20EV%20charging%20infrastructure_0.pdf

[10] Ibid, p. 3.

viability, such as in regional and remote areas. For example, the NSW Government has facilitated multiple rounds of EV fast charging grants with a focus on installing units in prescribed remote locations.[11]

## Concluding remarks

Should you have any queries in relation to this submission please do not hesitate to contact me on, telephone, 0436 929 403.

Yours sincerely,

Matthew Giampiccolo

**Matthew Giampiccolo**
Manager, Regulation and Policy

[11] NSW Government 2025, NSW offers $39 million to boost EV fast charging network, Media release, 4 December. Accessed at; https://www.energy.nsw.gov.au/news/nsw-offers-39-million-boost-ev-fast-charging-network