



EVX Response to AEMC

Facilitating Electric Vehicle Charging Infrastructure under Commonwealth Grants Rule 2026

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1. Executive summary

EVX supports the objective of accelerating the rollout of public electric vehicle charging infrastructure across Australia. Public charging infrastructure is essential to support consumer confidence, enable EV adoption for households without off-street parking, and reduce transport emissions.

However, EVX does not agree with the broad proposition that there is a general market failure in metropolitan kerbside charging. In metropolitan areas, particularly where councils support dedicated or clearly marked parking, where connection processes are predictable, and if facility access fees are reasonable, private charge point operators are able and willing to deploy infrastructure. The problem is not an absence of private sector capability or appetite. The problem is often the cost, complexity, inconsistency and delay created by the network access and connection environment itself.

EVX accepts that there may be localised market failures in certain regional and remote charging blackspots. However, even in those areas, the commercial challenge is often materially caused or exacerbated by network pricing, connection cost and operational complexity. For example, EVX has observed daily network access charges in some regional areas that are approximately 2.5 to 3 times higher than comparable metropolitan charges. This pricing structure directly worsens the business case for low-utilisation regional charging assets and risks creating the very “market failure” that the proposed program then seeks to solve through DNSP cost recovery.

EVX does not support the rule change, being that it enables a program, that in its current form creates several unaddressed risks.

The AEMC should only make the rule if it is amended to include stronger safeguards, including:

No.	Safeguard
1	No presumption of market failure. Metropolitan kerbside sites should only be made available to CPOs, through a genuine, transparent and commercially workable process.
2	Strict objective tests for regional blackspots. A DNSP should not be able to self-declare a site as uncommercial. Regional eligibility should be based on transparent criteria including utilisation forecasts, existing and planned private charging, council input, network charges, connection cost and evidence of failed market engagement.
3	Priority for network facilitation, not DNSP ownership. DNSPs should focus on publishing suitable network hosting data, standardising connection pathways, reducing connection timeframes, and providing cost-effective make-ready works.
4	No DNSP role in operating, retailing, pricing or customer relationships. DNSPs and related entities should be prohibited from acting as CPOs, EMSPs, retailers, app providers or customer-facing charging service providers within their own networks.
5	Strong ring-fencing and competitive neutrality safeguards. Any exemption from restricted asset or ring-fencing provisions must be narrow, time-limited and limited only to what is strictly necessary to deliver approved program works.
6	Transparent cost recovery. Any DNSP cost recovery from electricity consumers must be subject to efficient-cost benchmarking, AER oversight, project-level reporting, and no double recovery.
7	Facility access fee reform. Facility access fees should be capped, standardised and transparent. Where consumers fund make-ready or connection works, DNSPs should not be able to retain uncapped or poorly monitored access revenue in a way that creates double recovery.
8	Regional tariff reform before regulated ownership. Where regional charging is uncommercial because of network tariffs or daily access charges, tariff reform and targeted operating support should be considered before DNSP ownership is treated as the solution.
9	Commercial re-testing and asset transfer. DNSP-installed assets should be re-tested with the market at the end of the program and at end of asset life. Where viable, assets should be transferred or offered to the market rather than replaced by DNSPs.



10	Public reporting. The program should publish site-level and DNSP-level data on cost, connection timeframes, CPO take-up, access fees, utilisation, uptime, consumer outcomes, and reasons sites were not taken up by CPOs.
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Subject to these amendments, EVX supports a targeted program that removes barriers to efficient private investment and helps accelerate EV charging deployment. Without these safeguards, the rule change risks embedding DNSP participation in contestable markets, crowding out private capital, weakening competitive neutrality, and increasing costs to electricity consumers without a clear, demonstrable consumer benefit.

2. About EVX

EVX is an Australian public EV charging company focused on the deployment, operation and manufacture of kerbside EV charging infrastructure. EVX's model is based on lower-speed AC charging for long-dwell kerbside locations, particularly for residents without access to private off-street charging.

EVX supports market-led deployment of public charging infrastructure, with DNSPs playing a critical enabling role through efficient connections, transparent network data, practical access arrangements, and timely energisation. EVX does not support DNSPs owning, controlling or operating EV charging infrastructure in contestable markets where private CPOs are capable of deploying and operating infrastructure.

3. Response to consultation questions

Question 1: Problem statement

Do you agree with the problem statement as described by the proponent?

EVX supports the objective of accelerating EV charging infrastructure but does not agree with the problem statement to the extent it implies a broad market failure across kerbside charging.

The market is more nuanced. There are three distinct issues that should not be conflated:

1. **Metropolitan kerbside charging**, where private CPOs are capable of deploying infrastructure if access, parking, connection and council arrangements are workable.
2. **Regional and remote blackspots**, where there may be localised commercial gaps because of low utilisation, higher costs, longer travel distances, and limited revenue certainty.
3. **Network-created barriers**, including connection delays, complex approvals, high access fees, inconsistent asset access arrangements, and tariff structures that can make otherwise useful charging sites commercially marginal.

EVX's primary concern is that the proposed rule change may treat network-caused barriers as evidence of market failure and then allow DNSPs to recover the cost of solving those barriers through the regulated asset base. That would reward the same parties whose processes and pricing structures may be contributing to the problem.

a) Is there a “chicken and egg” problem in deploying AC kerbside EV charging infrastructure?

There is a consumer confidence issue in public charging, but EVX does not agree that this amounts to a general market failure in AC kerbside charging.

Kerbside AC charging is demonstrated as commercially and operationally viable where:

- parking is dedicated, marked or otherwise enforceable;
- councils support appropriate site selection;
- the location has genuine long-dwell demand;
- facility access fees are reasonable and predictable;
- connection costs are transparent and proportionate;
- connection timeframes are short enough to allow private capital to be deployed efficiently; and



- the CPO can own, operate and maintain the asset without being undermined by a regulated monopoly competitor.

The “chicken and egg” framing risks overstating the case for DNSP intervention. In many metropolitan locations, the issue is not that CPOs are unwilling to deploy. It is that deployment is slowed by and varying fragmented council engagement, inconsistent DNSP requirements, uncertain facility access costs, and slow or expensive connection processes.

The appropriate solution in cities is therefore not DNSP ownership. It is to remove the barriers to investment.

b) Is there a market failure for deployment of EV charging in regional and remote blackspots?

EVX accepts that there may be localised market failures in some regional and remote blackspots, particularly for DC charging where utilisation is low, demand is uncertain, and connection or network costs are high.

However, regional market failure should not be assumed. It should be demonstrated site by site or corridor by corridor.

In EVX’s experience, one of the most material regional barriers is network cost. Daily network access charges can be approximately 2.5 to 3 times higher in regional areas than comparable metropolitan areas. This is a major issue for EV charging assets because many regional chargers will have low utilisation in early years. High fixed daily charges materially increase the break-even utilisation threshold and discourage private investment.

This means the program should first ask: is the site uncommercial because of genuine lack of demand, or because network pricing and connection arrangements have made it uncommercial?

Where the issue is network pricing, the more efficient solution may be tariff reform, transitional network charge relief, standardised connection costs, or targeted operating support rather than DNSP ownership of charging assets. EVX notes that in New South Wales we currently pay the same facility access costs in regional areas as we do in the CBD. This pricing structure does not reflect the lower utilisation and higher commercial risk of regional sites and acts as a direct barrier to deployment. This issue could be quickly and easily addressed, and with more appropriate access pricing, pole-mounted DC chargers would become immediately viable in many regional locations, particularly given the strong appetite from local governments to support operators in these areas.

c) Are DNSP processes and prices barriers to efficient EVCI deployment?

Yes. DNSP processes and prices are material barriers to efficient EV charging deployment.

i. Connection processes, timeframes and costs

Connection processes can be slow, inconsistent and difficult to navigate at scale, particularly when comparing jurisdictions. This is particularly problematic for kerbside charging programs involving many small sites. In Victoria, EVX has experienced timelines where it can take up to six weeks simply to obtain a permit to attend site and install a charger on a pole, followed by a further two months to have the charger energised after installation. These delays materially increase project costs, tie up capital, and slow deployment.

In contrast, New South Wales, the Accredited Service Provider (ASP) scheme enables a more streamlined and competitive connection process. Under this model, accredited third parties can undertake contestable works, reducing reliance on DNSP-controlled processes and significantly shortening timelines. EVX has observed that comparable installations in NSW can be completed and energised within approximately one week. This demonstrates that faster, more efficient connection pathways are achievable without compromising safety or technical standards.



EVX supports reforms that move towards the NSW model, including greater use of accredited providers, programmatic assessment, standard technical designs, batch approvals and clear energisation timeframes. These changes would materially reduce costs and accelerate rollout. However, achieving these outcomes does not require DNSPs to own or control charging infrastructure.

ii. Site identification processes

DNSP network data is useful, but DNSP-led site identification should not be treated as a substitute for commercial, consumer and council-led site selection.

EVX also notes that current publicly available network visualisation tools in some jurisdictions are routinely inaccurate and can materially differ from the outcomes experienced when formal connection applications are submitted. This inconsistency reduces confidence in early-stage site screening, increases development risk for CPOs, and can lead to wasted time and resources pursuing sites that ultimately prove technically not possible. Improving the accuracy, transparency and reliability of these tools should be a priority if they are to support efficient market-led deployment.

A technically suitable pole is not necessarily a suitable charging location. A good charging location must also consider:

- parking availability;
- bay marking and enforcement;
- traffic safety;
- pedestrian access;
- disability access and kerb conditions;
- dwell time;
- proximity to residents without off-street parking;
- mobile coverage;
- lighting and passive surveillance;
- council support;
- streetscape impacts; and
- commercial demand.

DNSPs should publish network suitability data and support efficient site screening, and invest the time and resources required to improve their own network visibility and data to assist in timely assessments for new locations. They should not be the sole arbiter of whether a site is useful, commercial or appropriate for public charging.

iii. Facility access fees

Facility access fees are a significant barrier where they are inconsistent, opaque or excessive. In addition, access to facility access agreements (FAAs) in the first place can be a material barrier. This lack of access undermines competition and can effectively exclude capable private operators from participating in the market.

Capped access fees are a positive feature of the proposed program, but the rule and program guidelines should go further.

Facility access arrangements should ensure that:

- access to FAAs is available on fair, reasonable and non-discriminatory terms;
- processes for obtaining an FAA are transparent, timely and standardised;
- refusals to grant access are clearly justified and subject to review;
- standard terms and conditions are published and consistently applied; and
- no DNSP or related party is given preferential access.

Facility access fees should be:

- standardised across participating DNSPs where possible;
- published;
- capped for the full term of the program;
- linked to efficient incremental cost, not monopoly rent;



- not used to undermine the commercial viability of private CPOs; and
- reported publicly.

Where electricity consumers fund DNSP make-ready works or connection works, facility access revenue should be carefully monitored to prevent double recovery.

Question 2: Emissions reduction

EVX agrees that increased EV uptake will contribute to emissions reduction and that public charging infrastructure is part of enabling that transition.

However, EVX is concerned that the emissions reduction benefits may be overstated if the modelling assumes that all program-supported chargers are incremental, useful, accessible, reliable and located in places that materially change EV purchasing behaviour.

The emissions benefit depends not simply on the number of chargers installed, but on whether the chargers are:

- in locations where they are actually needed;
- visible and accessible to drivers;
- supported by dedicated or enforceable parking arrangements;
- reliable and maintained;
- utilised;
- interoperable and easy to access;
- commercially sustainable beyond the funding period; and
- additional to infrastructure that the market would otherwise have delivered.

For metropolitan kerbside charging, the counterfactual is particularly important. If private CPOs would have delivered many of the same sites under a more efficient connection and access framework, then the incremental emissions benefit of DNSP-funded delivery is lower than the headline charger count suggests.

EVX recommends that the AEMC require the final rule or program guidelines to include a transparent measurement framework for emissions benefits, including:

- expected utilisation by charger type and region;
- assumptions on incremental EV uptake;
- the extent to which infrastructure is additional to private-sector deployment;
- charger uptime and reliability;
- whether sites have dedicated or enforceable parking;
- whether sites are accessible and visible;
- actual energy delivered over time; and
- whether the charger remains operational after the program period.

The AEMC should be cautious about approving socialised cost recovery on the basis of emissions benefits unless those benefits are clearly linked to additional, useful and durable charging infrastructure and the underpinning utilisation assumptions that provide those reductions.

Question 3: Other benefits

EVX agrees that the program could produce benefits beyond emissions reduction, particularly if it improves the way DNSPs support EV charging deployment.

The most valuable enduring benefits would be:

1. **Better network data transparency.** CPOs should be able to access clear information about where low-cost connections are likely to be available.
2. **Standardised connection processes.** The program should create repeatable technical standards, faster approvals and clearer energisation timeframes.
3. **Transparent facility access arrangements.** CPOs should have predictable, capped and consistent access fees.



4. **Improved council coordination.** The program should demonstrate how councils, CPOs and DNSPs can coordinate site selection, parking, street works and community engagement.
5. **Better regional tariff evidence.** The program should identify how network tariff structures affect regional charging viability.
6. **A stronger evidence base for market design.** The program should show where private CPOs will deploy, where they will not, and why.

These benefits will only be realised if the program is transparent. If site selection, DNSP costs, access fees and tariff / cost outcomes are not publicly reported, the program will not provide meaningful insights for enduring market design.

Question 4: Contributions from all electricity consumers

EVX does not oppose all electricity consumer contributions in principle. There may be circumstances where limited, transparent and efficient consumer funding is justified because the spending delivers a broader public benefit.

Consumer funding should focus on market-enabling works, such as efficient make-ready works, connection standardisation and targeted support for genuine gaps in network capacity. It should not become a mechanism for DNSPs to expand into contestable EV charging infrastructure with regulated revenue protection.

Question 5: Proposed DNSP recovery of residual costs

EVX has significant concerns with the proposed DNSP cost recovery model.

a) RAB adjustment for capex

EVX does not support automatic RAB adjustment for DNSP capex unless stronger safeguards are included.

If capex is to be recovered from consumers, it should be subject to:

- efficient cost benchmarks;
- clear project-level cost caps;
- independent AER review;
- public reporting;
- limits on cost overruns;
- no recovery for inefficient or avoidable costs;

The rule should not allow DCCEEW alone to determine recoverable amounts without effective AER scrutiny. DCCEEW may be the program coordinator, but the AER is the economic regulator responsible for protecting consumers from inefficient regulated expenditure.

b) RAB adjustment for opex for the first five years

EVX does not support capitalising five years of opex into the RAB.

Operating expenditure for EV charging assets is not the same as network capex. It may include maintenance, customer support, software, communications, monitoring and other costs that should be subject to normal efficiency testing. Treating opex as a RAB adjustment risks weakening scrutiny and creating incentives for DNSPs to overstate operating costs.

If opex support is required for genuine regional blackspots, it should be:

- transparent;
- separately reported;
- tested against private-sector maintenance benchmarks;
- reduced by any EMSP, CPO or site revenue;
- reviewed annually; and



- discontinued where the site becomes commercial.

Opex should not be used to support DNSP-owned assets in areas where private CPOs already own and operate infrastructure under any circumstances

c) Ongoing opex in subsequent regulatory control periods

EVX does not support automatic treatment of ongoing EVCI opex as standard control expenditure in subsequent regulatory periods.

The default position should be that DNSP involvement ends, not that it rolls forward into future regulatory periods.

Double recovery and facility access fees

EVX is particularly concerned that facility access fees may not be netted off recoverable costs. If DNSPs are able to recover connection, site preparation or asset costs from consumers while also retaining facility access revenue from CPOs, this creates a risk of double recovery.

The program should require that:

- all CPO payments, EMSP payments, access fees and other site-related revenues are transparently reported;
- facility access fees are capped and published;
- any access revenue associated with consumer-funded assets is returned to consumers or netted against recoverable costs; and
- DNSPs cannot profit from assets or works already funded by consumers.

Question 6: Proposed timing for DNSP cost recovery

EVX prefers recovery, if allowed at all, to occur in the next regulatory control period rather than through a reopener in the current period.

A reopener would reduce scrutiny, increase the risk of consumer bill impacts, and weaken the discipline that should apply to a novel intervention in a contestable market.

Cost recovery should only occur after:

- the asset is commissioned;
- the site is operational;
- costs have been audited;
- CPO and other contributions have been netted off;
- the asset has met minimum service and reliability requirements; and
- the AER has had the opportunity to review the expenditure for prudence and efficiency.

The AEMC should not create a fast-track mechanism that allows DNSPs to recover costs before consumer benefits are demonstrated.

Question 7: Other changes to the National Electricity Rules

a) Should EVCI connection works not be classified as connection services under the NER?

EVX understands the practical reason for creating a special treatment for program connection works, particularly where DNSPs undertake make-ready works before a CPO is appointed.

However, EVX is concerned that removing these works from the normal connection framework may also remove important protections, transparency and accountability. This concern is particularly acute in jurisdictions such as New South Wales, where there is a well-established and competitive Accredited Service Provider (ASP) market for contestable connection works. This market has delivered productivity, efficiency and cost discipline through competition. Any move to reclassify or remove EVCI connection works from the



contestable framework risks undermining this market, reducing competitive pressure, and increasing the cost of connecting EVCI.

While contestable works frameworks are not uniform across all jurisdictions, the rule change should not result in a regression in states that have successfully implemented these schemes. Weakening or bypassing contestability in these jurisdictions would be a step backwards and is likely to increase costs for CPOs and, ultimately, consumers.

If the AEMC accepts this approach, it should create a narrow category of “program make-ready works” rather than a broad exclusion. This should be limited to works that:

- **are necessary to enable a specific approved EVCI site;**
- are transparently costed;
- are technically standardised;
- are available to all eligible CPOs on non-discriminatory terms;
- do not give a DNSP or related party a competitive advantage;
- preserve technical and safety obligations; and
- are subject to published timeframes and service standards.

CPOs should not lose rights or protections simply because a DNSP has initiated the works under the program.

b) Should restricted asset provisions not apply where they would prevent or limit a DNSP from delivering an approved EVCI project?

EVX does not support a broad exemption from restricted asset provisions or ring-fencing obligations.

ny exemption must be narrow, time-limited and only apply to the minimum activities necessary to deliver approved program works. It should not allow DNSPs to become enduring owners or controllers of contestable EV charging infrastructure.

The rule should make clear that DNSPs and related entities must not:

- sell electricity to EV drivers;
- operate as a CPO;
- operate as an EMSP;
- control customer pricing;
- control customer data beyond what is necessary for network functions;
- control charger branding or customer interface;
- favour related parties;
- bundle network access with preferred hardware or software providers;
- restrict CPO choice of compliant hardware;
- restrict interoperability; or
- use regulated information to gain an advantage in contestable markets.

The AEMC should be particularly cautious because treating program EVCI as a standard control service may automatically remove normal ring-fencing protections. That would be a significant step and should only occur with explicit replacement safeguards.

Question 8: Alternative solutions

EVX recommends that the AEMC consider alternatives that better target the actual barriers to deployment while preserving private investment and competitive neutrality.

1. Network make-ready model

DNSPs should be funded or required to provide make-ready works, network suitability data and standardised connection pathways, while CPOs retain responsibility for owning, operating and maintaining charging infrastructure.

This would address the network barrier without creating DNSP ownership in contestable markets.



2. CPO-led grant model

Government funding could be directed by CPOs, councils or site hosts, with CPOs and local governments responsible for identifying and prioritising suitable program locations within a defined timeframe. This process should be based on demonstrated demand, parking feasibility, accessibility, and local planning considerations, ensuring that sites are commercially and operationally viable from the outset.

Once sites are identified, DNSPs should be required to respond within a fixed and enforceable timeframe, providing connection assessments, cost estimates and access arrangements. DNSPs should be limited to claiming efficient, benchmarked costs and should be required to meet clearly defined KPIs for responsiveness, transparency, and delivery, including time to assessment, time to energisation, and adherence to standardised technical requirements.

This approach ensures that site selection is driven by those closest to end users and local conditions, rather than by DNSPs selecting locations based primarily on network convenience. It also prevents DNSPs from placing time and resource pressure on the market by advancing sites that may not align with commercial demand or council priorities. By structuring the process in this way, the program would better align incentives, accelerate deployment in the right locations, and preserve competitive neutrality while still leveraging DNSP capabilities where they are most effective.

This would maintain competitive tension, avoid giving DNSPs control over the rollout, and remove the risk of overconcentration in individual DNSP areas.

3. Regional tariff reform

For regional blackspots, the program should address the role of network tariffs and daily access charges. If regional network charges are 2.5 to 3 times higher than metropolitan charges, then targeted tariff reform may be more efficient than DNSP ownership.

Options could include:

- transitional regional charging tariffs;
- lower fixed daily charges
- demand charge holidays or caps;
- consistent treatment across DNSP areas.

4. Standardised facility access framework

The AEMC should consider a standardised access framework for use of DNSP poles and assets by CPOs. This should include published fees, standard terms, clear timeframes and dispute resolution now and beyond the program.

5. Independent blackspot assessment

Regional blackspot eligibility should be independently assessed, rather than determined by DNSPs. The test should consider private investment pipeline, existing chargers, utilisation forecasts, network costs, local demand, tourism and freight corridors, and council priorities.

Question 9: End of asset lives

DNSPs should not have an automatic right to replace EVCI assets at the end of asset life.

At the end of the program period and again at the end of asset life, each DNSP-installed asset should be commercially re-tested. The preferred outcome should be transfer to the market wherever possible.

The rule or program guidelines should require:

1. **Market re-test.** The site must be offered to CPOs through a transparent process before any DNSP replacement is allowed.
2. **Transfer option.** Where consumers have funded the asset, a CPO should be able to acquire or assume responsibility for the site on fair and transparent terms, potentially at depreciated or nominal value depending on the extent of consumer funding.



3. **No automatic replacement.** DNSPs should not be able to replace EVCI assets simply because they installed the original asset.
4. **Regional exception only.** DNSP replacement should only be considered where the site remains a genuine regional blackspot, no CPO is willing to take it on, No CPO has installed a locally competitive location and continued operation is shown to deliver a net public benefit.
5. **Removal and remediation.** If a site is no longer useful, the DNSP should be required to remove the asset and remediate the site.
6. **Recycling and refurbishment.** End-of-life obligations should include refurbishment, component recovery and responsible recycling.

The purpose of the program should be to accelerate the market, not create a regulated DNSP asset class that renews indefinitely.

Question 10: Broader role of DNSPs in EV charging

EVX's view is that DNSPs have an important role in enabling EV charging, but not in owning or operating EV charging infrastructure in contestable markets.

The enduring role of DNSPs should be to:

- provide timely and efficient connections;
- publish hosting capacity and site suitability data;
- standardise connection designs;
- support programmatic approvals;
- provide fair and transparent facility access;
- coordinate safely with councils and CPOs;
- support demand management and network integration; and
- ensure network tariffs do not inefficiently prevent charging deployment.

DNSPs should not be the default providers of EV charging infrastructure.

Provider of last resort for kerbside charging in metropolitan areas

EVX does not support DNSPs acting as provider of last resort for metropolitan kerbside charging

In metropolitan areas, the market should be presumed capable unless proven otherwise. All sites should be subject to a genuine market test, including:

- publication of site details;
- publication of expected connection costs and access fees;
- council parking status;
- sufficient response time for CPOs;
- ability for CPOs to propose alternative nearby sites;
- transparent reasons if CPOs decline; and
- independent confirmation that the site is not commercially viable.

Even then, DNSP involvement should not be considered in isolation and needs to be assessed against genuine need and other infrastructure of different kinds, available in that area.

Provider of EV charging for uncommercial regional blackspots

EVX accepts that DNSPs may have a limited provider-of-last-resort role in genuine regional blackspots. However, this should be a last step, not the starting assumption.

Before DNSP ownership is allowed, the program should test whether the issue can be solved through:

- tariff reform;
- lower fixed charges;



- connection cost support;
- CPO grants;
- council or site-host support;
- demand aggregation;
- fleet partnerships; or
- a CPO-led operating subsidy.

Where DNSP involvement is permitted, the DNSP should not operate the customer-facing charging service. A competitively selected CPO or EMSP should manage the customer interface, pricing, reliability obligations and service quality.

4. Recommended safeguards to close loopholes

EVX recommends that the AEMC include or require the following safeguards before making the rule.

4.1 Define market failure objectively

The rule should not rely on broad statements of market failure. It should require objective, transparent and independently verifiable evidence that a site or area is uncommercial. This evidence should be based on clearly defined criteria, including expected utilisation, capital and operating costs, network tariffs, connection costs, and realistic revenue projections. It should also take into account whether the site has been genuinely offered to the market and declined by capable CPOs under reasonable commercial terms. The assessment process should be documented, subject to oversight, and consistently applied across DNSPs to ensure that claims of market failure are not used to justify unnecessary or premature DNSP intervention in contestable markets.

4.2 Require genuine CPO first right of refusal

CPO first right of refusal must be genuine. Sites should not be offered in a way that makes them commercially or practically impossible to accept.

CPOs should receive:

- site location;
- pole or asset details;
- connection cost estimate;
- access fee;
- council parking status;
- expected energisation timeframe;
- technical constraints;
- photos or site drawings;
- proposed bay treatment;
- safety issues;
- demand information where available; and
- a reasonable response period.

DNSPs should be required to offer a low and efficient set of input costs to commercial operators before they can justify recovering costs from energy consumers.

4.3 Prevent DNSP cherry-picking

DNSPs should not be able to use the program to select attractive metropolitan sites, have consumers fund make-ready works, and then control the asset if CPOs do not accept the site under unreasonable terms.

4.4 Require council and parking readiness

A site should not proceed unless council parking, bay marking, accessibility and enforcement issues have been addressed. Chargers without usable parking do not deliver consumer benefit.



4.5 Net off all relevant revenues

All DNSP revenues associated with a program site should be reported and either netted off recoverable costs or returned to consumers through an appropriate mechanism.

4.6 Cap facility access fees

Facility access fees should be capped, published and standardised. CPOs should not face monopoly access charges that make otherwise viable sites uncommercial.

4.7 Independent AER oversight

The AER should retain a clear role in reviewing prudence, efficiency, double recovery and consumer impacts.

4.8 Transparent reporting

The program should publish quarterly reports so industry, consumers and regulators can assess whether the program is accelerating private investment or displacing it.

4.9 No related-party advantage

DNSPs should not be able to favour related entities, preferred contractors, preferred hardware suppliers or affiliated service providers.

5. Conclusion

EVX supports accelerating the rollout of EV charging infrastructure and recognises that targeted government intervention may be justified in genuine regional and remote blackspots.

However, the AEMC should not accept a broad market failure narrative for metropolitan kerbside charging. In cities, the private market is capable of deploying infrastructure where the regulatory, connection, parking and facility access settings are workable.

The proposed rule change should therefore be narrowed and strengthened. It should focus on removing network barriers, improving transparency, reducing connection costs, standardising access, and supporting genuine blackspots. It should not create a pathway for DNSPs to expand into contestable EV charging markets with regulated cost recovery and weakened ring-fencing protections.

With the safeguards outlined in this submission, the program can accelerate EV charging deployment while preserving private investment, competitive neutrality and the long-term interests of electricity consumers.