



25 June 2026

Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Email: submissions@aemc.gov.au
Project reference code ERC0436

Dear Sir / Madam

RE: Facilitating electric vehicle charging infrastructure rollout under Commonwealth grants – Consultation Paper

Origin Energy (Origin) appreciates the opportunity to provide a submission to the Australian Energy Market Commission's (AEMC) consultation paper - Facilitating electric vehicle charging infrastructure rollout under Commonwealth grants.

Origin supports the objective of accelerating the rollout of electric vehicle charging infrastructure (EVCI) to support EV uptake and emissions reduction. Reliable and accessible charging is essential to increasing EV adoption, particularly for customers without off-street parking and in regional areas where commercial investment opportunities may be limited.

Origin strongly supports a first right of refusal framework under which charge point operators (CPOs) are given the opportunity to identify, own and operate charging infrastructure before any distribution network service provider (DNSP) involvement is considered. Consistent with the contestable nature of EV charging services, CPOs should be responsible for deploying, owning and operating charging infrastructure, while DNSPs should play an enabling role by providing network information, connection assessments, capacity data and access to network assets where appropriate.

DNSPs should act as a provider of last resort and only be permitted to install charging infrastructure where a transparent market process demonstrates that no CPO is willing or able to deliver the project. This would ensure that competitive market delivery remains the primary means of rolling out charging infrastructure, while allowing targeted intervention where genuine charging gaps exist.

Funding arrangements should be consistent with this approach and support market-led investment and user-pays principles. Where charging infrastructure cannot be delivered on a commercial basis, government funding should be the primary mechanism for addressing viability gaps. Origin does not support the routine recovery of EVCI costs through DNSP regulated revenues or inclusion in the RAB, particularly where this would transfer costs to electricity consumers for services that are contestable in nature.

Any rule change should preserve the competitive provision of charging services and limit DNSP involvement to circumstances where there is a demonstrated market gap and infrastructure would not otherwise be delivered.

To support this approach, the AEMC should develop a detailed framework governing how charging sites are identified, assessed, offered to the market and, where necessary, developed by DNSPs as a provider of last resort. The framework should include:

- Transparent site identification criteria, including consideration of consumer need, expected utilisation, existing charging coverage, regional service gaps, network capability and value for money.

- Early publication of site information, including location details, available network capacity, indicative connection requirements, estimated augmentation requirements, access arrangements and any available government funding.
- A formal market testing process, under which CPOs are invited to express interest in developing identified sites.
- Reasonable participation timeframes to allow CPOs sufficient time to assess commercial viability, secure financing, negotiate land access and develop proposals.
- Transparent assessment criteria for evaluating proposals, including capability, experience, customer outcomes, delivery timeframes and efficient use of public funding, with the criteria published in advance.
- Clear criteria for determining market failure, before DNSP delivery can be considered. A site should only be deemed to have failed the market test where no credible proposal is received, or where proposals cannot be feasibly delivered.
- Transparency and reporting obligations, including publication of market testing outcomes and reasons why DNSP involvement has been deemed necessary.
- Review and dispute resolution mechanisms to provide confidence that DNSP participation occurs only where justified.

Connection processes, access arrangements and facility access charges can be significant barriers to investment. DNSPs should provide timely, transparent and non-discriminatory access to network information, connection services and network assets, supported by standardised processes, transparent charges and clear information on network capacity. Third-party CPOs should have access to the same information, processes and asset access arrangements available to DNSP-led projects.

Our response to select stakeholder questions is provided at Attachment A.

If you have any questions regarding this submission, please contact Gary Davies in the first instance at gary.davies@originenergy.com.au.

Yours sincerely



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Question 1: Problem statement

Do you agree with the problem statement as described by the proponent? If not, why?

1. Do you consider there is a “chicken and egg” problem in deploying AC kerbside EV charging infrastructure?
2. Do you agree that there is a market failure for deployment of EV charging in regional and remote blackspots?
3. Do you consider the following DNSP processes and prices to be barriers to efficient EVCI deployment:
 - a. connection processes, including timeframes and costs?
 - b. site identification processes?
 - c. facility access fees?

Origin agrees there is a degree of "chicken and egg" dynamic in some charging segments, particularly kerbside and regional charging, but considers the primary barriers are uncertainty regarding demand, utilisation and investment returns rather than an absence of competition.

Origin considers that some regional and remote locations may require targeted support where charging infrastructure is unlikely to be delivered on a commercial basis. This reflects challenges associated with commercial viability, investment uncertainty and limited market information, rather than a systemic market failure.

Origin agrees that DNSP connection processes, site identification processes and facility access charges can create barriers to EVCI investment. Even where a CPO is willing to invest, long connection timeframes, complex approval processes, limited information about network capacity and unclear access arrangements can increase costs and delay projects.

Access to information is particularly important. CPOs need clear and timely information about suitable locations, available network capacity, likely connection costs and any network upgrades that may be required. Without this information, it can be difficult to assess whether a project is viable and worth pursuing.

Origin considers that DNSPs should provide timely, transparent and non-discriminatory access to information, connection services and network assets. Standardised connection processes, clear service levels, transparent charges and better information on network capacity and potential charging locations would help reduce costs, improve investment certainty and accelerate the rollout of EVCI.

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 consider that the Commonwealth funding program may deliver benefits beyond emissions reduction. It may help address early investment barriers, accelerate deployment in areas where commercial investment may otherwise be limited, improve consumer confidence in EV adoption and provide practical experience with different delivery models.

The program also provides an opportunity to test and evaluate approaches to site selection, market testing, DNSP facilitation, facility access arrangements, connection processes and provider-of-last-resort mechanisms. These insights could help inform the development of an enduring framework for EVCI deployment and identify areas where regulatory or market reforms may be required.

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?

Origin's preference is for EVCI to be funded through user-pays arrangements wherever possible. As a general principle, the costs of charging infrastructure should be borne by those who use and benefit from the service, rather than being recovered from all electricity consumers.

However, we recognise that there may be a case for targeted support in regional and remote charging blackspots where charging infrastructure is unlikely to be commercially viable and would not otherwise be delivered by the market. In these circumstances, targeted intervention may be justified to address genuine charging coverage gaps and support broader public policy objectives. In these circumstances, government funding should be the primary mechanism for addressing viability gaps. Origin does not support the recovery of EVCI costs from electricity consumers through DNSP regulated revenues or inclusion in the RAB for services that are contestable in nature.

Where a project remains commercially unviable after available government funding, this does not in itself justify recovery of costs from electricity consumers. Additional government funding or a reassessment of project scope may be more appropriate.

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?

Origin does not support the proposed inclusion of either capex or opex associated with EVCI projects in DNSP regulated revenues or the RAB. EV charging is a contestable service and, as a general principle, the costs of charging infrastructure should be borne by infrastructure owners, operators and users rather than socialised across all electricity consumers.

Where charging infrastructure cannot be delivered on a commercial basis, government funding should be the primary mechanism for addressing viability gaps. DNSPs should only be permitted to develop charging infrastructure as a provider of last resort where a transparent market process demonstrates that no CPO is willing or able to deliver the project.

If the AEMC nevertheless decides to permit DNSPs to recover EVCI costs through the regulatory framework, any recovery should be limited to efficient and prudent capital expenditure associated with approved provider-of-last-resort projects. Capital expenditure may be more appropriate for regulatory recovery than operating expenditure because it relates to the upfront investment required to establish infrastructure in locations where a demonstrated charging gap exists.

Origin does not support the recovery of operating expenditure through DNSP regulated revenues or its inclusion in the RAB. Ongoing operating costs are incurred in providing a charging service and should be recovered from users through charging fees. Recovering opex through user charges maintains a direct relationship between service usage and cost recovery, preserves incentives for efficient operation and utilisation, and is more consistent with the contestable nature of EV charging services.

Question 6: Proposed timing for DNSP cost recovery

Do you agree with the proponent's proposal that DNSPs recover costs in the next regulatory control period? If not, should DNSPs instead be able to recover costs incurred in the current regulatory control period through a reopener?

Origin considers that government funding and user-pays arrangements should remain the primary means of funding EVCI projects.

If the AEMC nevertheless decides to permit DNSPs to recover EVCI costs through the regulatory framework, Origin does not have a strong preference between recovery through the next regulatory determination or a reopener mechanism.

In general, recovery through the next regulatory determination is likely to be administratively simpler and allows expenditure to be assessed alongside other regulatory proposals, providing an opportunity for stakeholder scrutiny of the prudence and efficiency of costs.

A reopener mechanism may be appropriate where timely cost recovery is necessary to facilitate delivery of approved projects and waiting until the next regulatory determination would create implementation challenges. However, any reopener should be subject to clear eligibility criteria, robust assessment and appropriate regulatory oversight.

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

Origin does not support a blanket exemption from the existing NER framework. Any departure from the current connection service and restricted asset provisions should be narrowly targeted and limited to circumstances where a DNSP is acting as a provider of last resort following comprehensive market testing.

Origin sees merit in ensuring that regulatory arrangements do not create unnecessary barriers to the delivery of approved EVCI projects. However, EVCI remains a contestable service and the framework should continue to encourage market-led delivery wherever possible. Any changes should therefore be designed to facilitate project delivery without providing DNSPs with an undue advantage over competing CPOs.

Similarly, Origin considers that any exemption from the restricted asset provisions should be limited to approved projects where a DNSP has been demonstrated to be the only viable delivery option. Broad exemptions could risk expanding DNSP involvement into contestable markets and undermine competitive neutrality. Appropriate ring-fencing, cost allocation and transparency requirements should continue to apply to ensure DNSP participation remains targeted and proportionate.

Overall, any modifications to the NER should be no broader than necessary to facilitate approved projects and should preserve the principle that EV charging infrastructure is primarily delivered through competitive markets, with DNSPs acting only as a provider of last resort.

Question 8: Alternative solutions

Are there alternative solutions for integrating the proponent's funding program in the NER that you think we should consider?

Origin's preference is for the funding program to be designed in a way that maximises competitive, market-led delivery and minimises the need for DNSP ownership or operation of charging infrastructure.

Rather than focusing primarily on mechanisms that enable DNSPs to recover costs through the NER, the AEMC should consider options that address the underlying barriers to private investment. This could include improving transparency of network capacity information, standardising connection processes, streamlining access to suitable sites and network assets, and establishing a clear market testing framework under which CPOs are given a first right of refusal to develop identified charging locations.

The AEMC could also consider a model where government funding is directed towards site preparation, network upgrades and connection works, while CPOs remain responsible for delivering and operating the charging infrastructure. This would reduce upfront investment barriers while maintaining market-led delivery.

More broadly, any framework should seek to leverage government funding as the primary mechanism for addressing viability gaps, with DNSP involvement limited to circumstances where market-led delivery is not feasible. This would better align with the principle that EV charging infrastructure is a contestable service and should, wherever possible, be delivered by competitive providers rather than regulated monopoly businesses.

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)?

Origin does not consider that DNSPs should have an automatic right to replace EVCI assets at the end of their useful life. EVCI is a contestable service, and replacement decisions should, wherever possible, be subject to competitive market processes rather than ongoing regulated ownership.

Where a DNSP has developed charging infrastructure as a provider of last resort, the need for replacement should be reassessed at the end of the asset's life. By that time, market conditions, EV uptake and charging demand may have evolved significantly, and competitive providers may be willing and able to deliver the service without regulatory support.

Before any replacement occurs, the site should therefore be subject to market testing, with CPOs given the opportunity to develop, own and operate replacement infrastructure. DNSP replacement should only be permitted where market testing demonstrates that no viable commercial provider is willing or able to deliver the service and there remains an ongoing need for the infrastructure.

This approach would help ensure that DNSP involvement remains limited to genuine market gaps, supports competitive neutrality and avoids long-term expansion of regulated businesses into contestable EV charging markets.

Question 10: Supplementary question

Broader considerations of the enduring role of DNSPs in rolling out EVCI are out of scope of this rule change request.

The Commission will be consulting on these issues and asking related questions as part of the consultation for package 1 of the Electricity Network Regulation Review and related rule change requests. Consultation will be undertaken from June 2026.

However, you may wish to share early views on the role of DNSPs in EV charging, including the roles as identified within this rule change request, namely:

- as provider of last resort for kerbside charging in metropolitan areas?
- as the provider of EV charging for uncommercial regional blackspots?

Origin's preference is for EV charging infrastructure to be delivered by the competitive market wherever possible, with DNSPs playing an enabling role by providing network information, connection services and access to network assets where appropriate. EV charging is a contestable service and should generally be developed, owned and operated by CPOs rather than regulated monopoly businesses.

Origin sees merit in DNSPs acting as a provider of last resort in limited circumstances where market testing demonstrates that no CPO is willing or able to deliver charging infrastructure on reasonable commercial terms. However, DNSP ownership and operation of charging infrastructure should not become the default solution for addressing deployment challenges. The primary focus should remain on removing barriers to market-led investment, including improving access to network information, streamlining connection processes, facilitating access to suitable sites and addressing viability gaps through targeted government support where necessary. Over time, as EV uptake and charging demand increase, the need for DNSP involvement should diminish and competitive provision should remain the preferred outcome.