

Ms Anna Collyer
Chair Australian Energy Market Commission

Dear Ms Collyer,

Facilitating electric vehicle charging infrastructure under Commonwealth grants Consultation Paper (ERC0436)

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) consultation paper on *Facilitating electric vehicle charging infrastructure under Commonwealth grant*.

PLUS ES is a registered Metering Co-ordinator (MC) and an accredited Metering Provider (MP), Metering Data Provider (MDP) and Embedded Network Manager (ENM) in the National Electricity Market (NEM). Our skilled workforce provides metering services across Australia and supports Consumer Energy Resources (CER) deployment. We provide metering services through retailers and directly to customers ranging from small residential customers through to Australia's largest manufacturers and mining operators. PLUS ES has direct, practical experience deploying kerbside electric vehicle charging infrastructure (EVCI), including solutions incorporating integrated (in-built) metering arrangements.

PLUS ES supports the policy intent of the Program and the objective of accelerating the rollout of kerbside and regional blackspot electric vehicle (EV) charging. We recognise the deployment challenges the proponent has identified, and we do not oppose a time limited, grant supported role for Distribution Network Service Providers (DNSPs) as a provider of last resort where the competitive market does not deliver.

Our submission supports this policy direction by identifying opportunities to refine the proposed framework, including leveraging existing market arrangements and ensuring clear allocation of responsibilities across stakeholders.

Our key points are summarised below:

- **Provide clear delineation of regulated and contestable services.** While the proposal appears intended to align with the 'Unlocking CER benefits through flexible trading' final rule, the consultation paper is silent on how Program EVCI will be metered and settled. This ambiguity highlights the need to clearly delineate DNSP participation from the NER-defined contestability of metering, especially since EVCI solutions incorporate integrated metering arrangements.
- **Metering must stay contestable and out of the regulated asset base (RAB).** PLUS ES maintains that metering should remain contestable and outside the RAB, irrespective of asset ownership, in the long-term interests of consumers and consistent with the National Electricity Objective (NEO).
- **Use the existing metering framework.** Program EVCI should be metered under the contestable metering installation type (such as Type 9 or Type 4)¹, avoiding any bespoke or undefined metering pathway.
- **Keep the market competitive across the value chain.** Any reclassification of EVCI connection works, or changes to restricted asset and ringfencing rules, should not extend to metering, consistent with the position that DNSPs cannot participate in the sale of electricity.
- **Clarity on where the connection is located.** PLUS ES would also suggest the rules clarify whether the 'connection point' for DNSP installed EVCI must be on the network side of the EVCI electronics or whether it can be installed on the downstream (vehicle connection) side of the EVCI electronics.

¹ AEMC 'Unlocking CER benefits through flexible trading' final rule, effective 31 May 2026.

Further detail and information on each of the above points can be found in the accompanying Appendix A – Answers to the consultation questions. Additionally, PLUS ES welcomes further discussions in relation to this submission or any other item relating to the topic.

If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at Helen.vassos@pluses.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nural', with a long, sweeping horizontal stroke extending to the right.

Nural Omer
PLUS ES – Head of Metering

APPENDIX A – ANSWERS TO THE CONSULTATION QUESTIONS

PLUS ES has provided responses to the stakeholder consultation questions in the table below for the AEMC’s consideration.

Questions	PLUS ES feedback
1. PROBLEM STATEMENT	
<p>Do you agree with the problem statement as described by the proponent? If not, why?</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> a. connection processes, including timeframes and costs? b. site identification processes? c. facility access fees? 	<p>PLUS ES does not contest the proponent’s characterisation of the deployment problem. We defer to charge point operators (CPOs) and DNSPs on connection processes, site identification and facility access fees, where they have direct commercial experience.</p> <p>In response to sub-question (3), we note that the contestable Type 9 framework has already removed the principal historical obstacle, the cost and physical complexity of installing a separate external meter, by enabling compliant in-built measurement at the connection point. Any residual deployment friction can and should be addressed without undermining metering contestability, which is already fit for purpose for this use case.</p>
2. EMISSIONS REDUCTION	
<p>Do you have any views on the proponent’s assessment of the emissions reduction benefits?</p>	<p>Not applicable. PLUS ES has no basis on which to assess the proponent’s emissions methodology or assumptions and offers no view.</p>
3. OTHER BENEFITS	
<p>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?</p>	<p>PLUS ES supports using the Program to inform enduring market design, and we ask the Commission to treat the metering arrangements for Program EVCI as a deliberate output of that learning. The Program is an opportunity to establish a clear, replicable and contestable metering model for kerbside and blackspot charging under Type 9, with transparent allocation of metering responsibility and cost.</p> <p>This is directly relevant to Package 1 of the Electricity Network Regulation Review (EPR0106), which concerns what services DNSPs should and should not provide. If the Program leaves metering undefined, it risks generating a precedent in which metering is bundled with network owned assets by default, contrary to the reform objective of promoting competition. We encourage the Commission to design the Program so that it supports contestable metering models, rather than creating a gap that is later addressed through DNSP provision.</p>
4. CONTRIBUTIONS FROM ALL ELECTRICITY CONSUMERS	
<p>Do you consider it appropriate for EVCI projects approved as part of the funding program to have a difference between the</p>	<p>PLUS ES takes no position on whether the residual EVCI capital gap should be funded by all electricity consumers, that</p>

<p>total project costs and the amount CPO's are willing to pay funded through a combination of government funding and contributions from all electricity consumers?</p>	<p>is a distributional question for consumer advocates and the Commission.</p> <p>The following feedback is also relevant to Questions 5 and 7: regardless of the funding split adopted, metering capex and opex should not be included in any residual amount recovered through the RAB. As a contestable service, metering should not be socialised to consumers, as this risks double recovery where costs are also recovered through competitive market arrangements. Metering should instead be procured and recovered through the competitive market, consistent with all other connections in the NEM. Where the consultation contemplates a consumer-funded gap, that gap should be expressly defined to exclude metering.</p>
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5. PROPOSED DNSP RECOVERY OF RESIDUAL COSTS

<p>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:</p> <ol style="list-style-type: none"> 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 2. years? If not, why? 3. Treat any ongoing opex in subsequent regulatory control periods in the same way as opex for 3. standard control services under the NER framework? If not, why? 	<p>PLUS ES does not oppose the proposed RAB mechanism for genuine EVCI network and charging asset costs and supports cost recovery certainty for DNSPs acting as a provider of last resort. However, the proposal, as drafted, does not clearly delineate the boundary of recoverable costs, and could permit metering capex and metering opex to be included in the RAB. The Commission should explicitly clarify and exclude metering from RAB treatment.</p> <p>Why metering should be excluded from RAB roll-in:</p> <ul style="list-style-type: none"> • Metering is a contestable service. Metering provision and metering coordination are contestable under Chapter 7 of the NER. Including metering capex or opex into a DNSP's RAB, even inadvertently, through a broad definition of 'EVCI project costs' or the 'Program adjustment amount', would convert a contestable service into a regulated, consumer funded monopoly service. This represents a structural market change by default rather than by deliberate policy, inconsistent with the NEO and with the competitive neutrality objectives of Package 1; • There is no efficiency case for bundling. The Type 9 framework already provides for the contestable appointment of the MC, MP and MDP for precisely this kind of connection. The Financial Responsible Market Participant (FRMP) appoints the MC, exactly as for type 1-4 installations. DNSP provision of metering is therefore neither necessary nor lower cost; it simply removes a service from competition; and • Five-year opex capitalisation magnifies the risk. Because the proposal capitalises the first five years of opex into the RAB, any metering opex (data services, meter reading, communications, maintenance) captured within 'approved opex' would be locked into the regulated asset base for the long term and recovered from all consumers. <p>Recommended drafting</p>
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	<p>We recommend the Commission insert an express carve-out into the transitional rule (the proposed Part ZZZZZK / clause 11.1xx) so that metering is excluded from all amounts eligible for RAB adjustment. A carve out of the following effect would achieve this:</p> <p>For the purposes of this Part, the Program adjustment amount, approved capital expenditure and approved operating expenditure for an approved EVCI project must not include any costs related to:</p> <ul style="list-style-type: none"> • The provision, installation, ownership or replacement of a metering installation for the EVCI; or • Metering coordination, metering provision or metering data services for the EVCI; <p>And such metering services must be provided on a contestable basis in accordance with Chapter 7.</p> <p>In summary, PLUS ES supports RAB recovery of legitimate EVCI network and charging asset costs under the proposed mechanism in 5(1), 5(2) and 5(3), provided that metering installation, provision, coordination and data services are expressly excluded and left to the competitive market.</p>
6. PROPOSED TIMING FOR DNSPS COST RECOVERY	
<p>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?</p>	<p>Not applicable. The timing of DNSP cost recovery, whether through the next regulatory control period or a reopener in the current period, has no material bearing on metering contestability, provided metering costs are excluded from the recoverable amount as set out in our response to Question 5.</p>
7. OTHER CHANGES TO THE NATIONAL ELECTRICITY RULES	
<p>1. Do you agree with the proposals that: EVCI connection works should not be classified as connection services under the NER? If not, why?</p> <p>2. The restricted asset provisions should not apply where they would otherwise prevent or limit a 2. DNSP from delivering an approved EVCI project? If not, why?</p>	<p>The proposal would (a) provide that EVCI connection works are not classified as connection services, and (b) set aside the restricted asset provisions where they would otherwise prevent a DNSP delivering an approved EVCI project.</p> <p>PLUS ES does not object to these changes in principle. However, we recommend the Commission makes three matters explicit in the rule, rather than leaving them to subsequent understanding by the AER or individual DNSPs:</p> <p>(a) Metering is not 'connection works' or an 'EVCI service'</p> <p>Reclassifying EVCI connection works and setting aside the restricted asset provisions must not have the side effect of drawing metering installation, provision or data services into standard control treatment or the network monopoly. 'Connection works' for EVCI should be defined to mean the network connection assets up to and including the connection point and should expressly exclude the metering installation and</p>

metering services. Without an express exclusion, there is a risk that a DNSP treats the in-built meter (measurement device) within a charging unit as part of the 'EVCI' it installs and maintains, thereby foreclosing the contestable metering roles;

(b) The contestable metering roles are preserved

Where a DNSP installs EVCI as provider of last resort, the FRMP for that connection must still appoint the MC on a contestable basis under the standard Type 9 or Type 4 arrangements, and the DNSP must not be permitted to self-supply metering on a ring-fence-exempt basis. This keeps the rule consistent with the existing contestable metering framework and with the competitive neutrality safeguards the proponent already relies on (CPO first right of refusal; the DNSP being barred from selling electricity); and

(c) Clarify the location of the connection point for DNSP-installed EVCI

PLUS ES considers it important that the Rules clearly define the location of the connection point for DNSP-installed EVCI, given its direct implications for metering arrangements, NMI assignment, and market settlement outcomes. While this issue may also intersect with AEMO's NMI Standing Data requirements, clarity within the Rules is necessary to ensure a consistent interpretation across DNSPs, retailers, metering providers, and other market participants.

Currently, there is insufficient guidance regarding whether the connection point is established at the network interface to the EVCI or at a downstream point, such as the vehicle charging interface. This uncertainty creates ambiguity regarding:

- The appropriate location for NMI establishment; and
- Whether metering should measure energy supplied to the EVCI or energy ultimately delivered to the electric vehicle.

Where a downstream connection point is permitted, the Rules should also specify how losses within the EVCI, including conversion and operational losses, are to be treated, whether as part of the RAB for the Network or similar mechanism, or otherwise catered for in metering or market settlement mechanisms.

Providing clear and unambiguous requirements will support consistent implementation across jurisdictions and ensure alignment between connection point definitions, metering arrangements, and settlement outcomes.

Treat metering the same way as the sale of electricity

	<p>The proponent has already accepted that any exemption from ring-fencing should not extend to the sale of electricity, a DNSP cannot become the CPO/ e-Mobility Service Provider (eMSP) and retail energy. PLUS ES submits that metering should be treated in the same way: expressly excluded, because it is likewise a contestable, ring-fenced activity for which competition already exists.</p> <p>Recommended drafting</p> <p>To give effect to the above, we recommend wording of the following effect accompany the service classification and ring-fencing provisions:</p> <ul style="list-style-type: none"> • Nothing in this Part, and no classification of EVCI connection works, operates to: <ul style="list-style-type: none"> ○ Classify a metering installation, or metering coordination, metering provision or metering data services, as a direct control service or standard control service; or ○ Relieve a Program DNSP of any obligation under Chapter 7 or the ring-fencing guideline in respect of metering; • The restricted asset provisions and the ring-fencing guideline under this Part do not apply to: <ul style="list-style-type: none"> ○ The sale of electricity; or ○ The provision of metering services, <p>Each of which remains contestable.</p>	
8. ALTERNATIVE SOLUTIONS		
<p>Are there alternative solutions for integrating the proponent’s funding program in the NER that you think we should consider?</p>	<p>PLUS ES proposes a targeted addition rather than an alternative to the overall funding mechanism. The single most effective way to remove any ambiguity in the current drafting, without reopening the funding model, is to clarify that Program EVCI be metered under the existing contestable Type 9 framework, with metering costs kept out of the RAB.</p> <p>The following recommendations are proposed:</p> <ul style="list-style-type: none"> • Program EVCI is to be metered using the Type 9 metering installation type (or such other contestable installation type as applies), consistent with the Flexible Trading Arrangements commencing 31 May 2026; • Metering capex and opex are excluded from the Program adjustment amount and from any RAB roll-in (per our response to Question 5); and • A contestable MC is appointed by the FRMP / Large Customer for each connection point, whether the charger is operated by a CPO or, as last resort, installed by a DNSP. <p>This approach aligns the Program with market arrangements that have already commenced, avoids creating a bespoke or undefined metering pathway, preserves contestability, and provides a clean and unambiguous basis on which to exclude metering from the Program adjustment amount. This is the</p>	

	<p>lowest-friction approach to clearly delineating responsibilities, requiring no change to the grant model, the 30:70 funding split, or the provider-of-last-resort design.</p> <p>Interaction with related rule changes. We note the broader questions of DNSP role and ring-fencing are being considered through ERC0437 (ENA), ERC0435 (Nexa Advisory) and Package 1 of the Network Regulation Review. Whichever direction those reforms take, the principle that metering remains contestable should be consistent across all of them. Embedding that principle in ERC0436 now would set a coherent precedent rather than pre-empting a fragmented one.</p>
<p>9. END OF ASSET LIVES</p>	
<p>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)?</p>	<p>PLUS ES's interest here is narrow but important. Regardless of the Commission's approach to end-of-life replacement or re-offering of DNSP-owned EVCI assets, metering should at all times remain under a contestably appointed MC.</p> <p>Any transfer of EVCI assets, for example, a re-offer to a CPO at end of the depreciation period, or transfer of a Design 2 asset to a winning CPO, must allow for the transfer or reappointment of metering roles, without defaulting to the DNSP. End-of-life and asset-transfer events should not enable metering to revert to the network.</p> <p>We recommend the Commission make clear that re-offer, replacement and transfer mechanisms operate independently of metering, and that metering contestability is preserved in all circumstances.</p>
<p>10. SUPPLEMENTARY QUESTION</p>	
<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • as provider of last resort for kerbside charging in metropolitan areas? • as the provider of EV charging for uncommercial regional blackspots? 	<p>PLUS ES will engage in detail through the Package 1 / Electricity Network Regulation Review process. We offer one early view here. In any enduring model, and in either DNSP role identified by the proponent, provider of last resort for metropolitan kerbside charging, or provider for uncommercial regional blackspots, metering should remain a contestable service.</p> <p>The case for limited, market-failure-based DNSP participation in physical charging infrastructure does not extend to metering. Metering is already competitive, already contestable under Type 9 and Type 4, and already delivering the cost reductions the Program seeks. We encourage the Commission to adopt the preservation of contestable metering as a fixed design principle across all of the EVCI rule changes (ERC0436, ERC0437 and ERC0435), so that the enduring framework is internally consistent and consumers retain the benefits of competition in metering regardless of how charging asset ownership is ultimately settled.</p>