

23 July 2026

Ms Anna Collyer  
Chair Australian Energy Market Commission

Dear Ms Collyer,

**Electricity Network Regulation Review - Package 1 (EPR0106) (ERC0435) (ERC0437)**

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) consultation paper on the *Electricity Network Regulation Review Package 1* and the related rule change requests on distribution ring-fencing and Distribution Network Service Provider (DNSP) led electric vehicle charging infrastructure (EVCI).

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), distributed energy integration and emerging energy technologies. We provide metering services through retailers and directly to customers ranging from small residential customers through to Australia's largest manufacturers and mining operators. We are also preparing to provide Type 8/9 metering and accredited NMI Service Provider services under the AEMC's Unlocking CER Benefits through Flexible Trading (FTA) final determination.

Our submission is guided by the following key principles:

- Preserving effective, contestable market frameworks for metering, settlement and customer choice as network regulation evolves. PLUS ES considers the existing Type 9 framework, informed by our EV charging waiver experience, and the forthcoming Type 8 and Secondary Settlement Point (SSP) arrangements to provide fit-for-purpose pathways for Electric Vehicle (EV) charging and CER participation;
- Maintaining clear separation between regulated and contestable services. While PLUS ES is neutral on the ownership of EV charging and CER assets, ownership and future Distribution System Operator (DSO) functions should not determine or displace established contestable roles, including MC, MP, MDP and NMI Service Provider functions;
- Supporting network visibility without expanding control of contestable services. Access to CER, EV charging and SSP information should support network operations while preserving existing market responsibilities, accountability arrangements and competitive service delivery models; and
- Protecting competitive neutrality in funding and cost recovery mechanisms. Metering, communications, data and related services should continue to be procured through competitive markets and remain outside regulated cost recovery arrangements, regardless of asset ownership or funding model.

Accordingly, PLUS ES recommends that the AEMC:

- Recognise Type 9 as the existing fit for purpose metering pathway for eligible kerbside and street furniture EV charging;
- Preserve the Type 8 and SSP framework, including the Financially Responsible Market Participant's (FRMP) ability to select accredited NMI Service Provider and metering providers;
- Maintain the contestability of metering, NMI management, communications, data, platform, retail and related market services, independent of asset ownership;
- Strengthen ring-fencing for connection and hosting capacity information, CER data, Primary Connection Point (PCP) and SSP relationships, NMI standing data, systems, communications, procurement and shared assets;

- Treat DSO access to data and operational rights as distinct from ownership or control of contestable market services;
- Apply beneficiary pays principles, transparent cost allocation, revenue offsets and periodic review to any consumer funded DNSP activity; and
- Avoid creating a precedent that allows DNSP ownership, installation capability or DSO status to displace accredited Type 8, Type 9 or NMI Service Provider roles.

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 at [Helen.vassos@pluses.com.au](mailto:Helen.vassos@pluses.com.au).

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Nural Omer', with a long, sweeping horizontal line 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>QUESTION 1   Prioritisation framework for the Review</b>                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1. Do you have any feedback on our approach to the Review, including the proposed prioritisation framework                                                                                                                                                                                    | <p>PLUS ES supports the proposed prioritisation framework. In addition to materiality, implementation feasibility and separability, the AEMC should explicitly consider the impact on established contestable markets and recent reforms.</p> <p>The Review should also protect contestability and avoid unnecessary redesign or duplication of recently commenced and imminent market frameworks where fit-for-purpose solutions already exist. Type 9 metering commenced on 31 May 2026 to support eligible kerbside and street furniture charging, while Type 8 metering and SSPs commence on 1 November 2026 to facilitate flexible CER arrangements. These frameworks should be afforded the opportunity to operate and mature before alternative arrangements are considered, as there is currently no clear evidence of a regulatory gap. PLUS ES' experience through EVCI trial waivers and engagement across a range of operational and commercial models suggests that existing and emerging frameworks are capable of supporting innovation and diverse implementation approaches without requiring the creation of parallel regulatory arrangements.</p> <p>The highest priority reforms should be those that:</p> <ul style="list-style-type: none"> <li>• Protect competition and consumer choice;</li> <li>• Clarify boundaries between regulated and contestable services and prioritise issues where monopoly leverage could affect contestable EV charging, CER, metering, NMI management, data or communications services;</li> <li>• Improve connection and facility access processes;</li> <li>• Strengthen ring-fencing protections around data, information access and market participation so service classification, metering procedures, SSP standing data and market systems remain aligned; and</li> <li>• Sequence future DSO reforms so network operational responsibilities and data access are clearly separated from contestable service provision.</li> </ul> |
| <b>QUESTION 2   What network services should be subject to economic regulation and are changes to the service classification framework required?</b>                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1. What, if any, changes do you think should be made to the service classification arrangements (including the timing of when service classification decisions are made) to ensure they remain fit for purpose into the future and sufficiently flexible to accommodate the changes underway? | <p>Service classification arrangements remain broadly appropriate but should become more responsive to changing technologies and markets. The Australian Energy Regulator (AER) should be able to revisit service classification decisions within a regulatory control period where material changes occur. Decisions made through the Framework and Approach process can remain in place for five to seven years, which may not provide the flexibility required to accommodate rapidly evolving technologies and service offerings. Emerging markets such as EV charging, CER coordination and flexibility services are developing at a pace that can outstrip static regulatory settings, creating a risk that regulatory arrangements become misaligned with market and technological developments over time.</p> <p>Classification decisions should focus on the nature of the service being provided rather than ownership of the underlying asset.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>2. Do you think there are any circumstances in which it would be in the long term interests of consumers for NSPs to provide regulated services in contestable markets? If so, please explain:</p> <ul style="list-style-type: none"> <li>a. what those circumstances are</li> <li>b. how this would work in practice</li> <li>c. how the framework should limit the ability of networks to leverage their regulated monopoly position to limit competition in contestable markets.</li> </ul> | <p>a. There are circumstances where it may be in the long term interests of consumers for NSPs to provide regulated services within otherwise contestable markets. Kerbside EVCI is one example where DNSP ownership of passive, open-access infrastructure may deliver efficient deployment outcomes, improved utilisation of existing network assets and broader consumer benefits.</p> <p>DNSPs may be well positioned to deploy and maintain passive infrastructure through existing poles, field workforce capability and network expertise. However, ownership of charging infrastructure should not determine ownership or control of adjacent contestable services.</p> <p>Retailers, Charge Point Operators (CPO) and other market participants should continue to compete in the provision of charging services, electricity supply and customer offerings. Measurement, settlement, communications, metering data and NMI services should remain contestable and continue to operate through the existing Chapter 7 and FTA regulatory frameworks.</p> <p>The framework should include enforceable open-access obligations, information equivalence requirements, transparent cost allocation arrangements and explicit preservation of contestable market roles.</p> <p>b. In practice, DNSP participation should be limited to the regulated infrastructure layer. Retailers, CPOs and other market participants would continue to compete in the provision of charging services, electricity supply and customer offerings, while measurement, settlement, communications, metering data and NMI services continue to operate through the existing Chapter 7 and FTA frameworks.</p> <p>c. Competition should be protected through enforceable open access obligations, information equivalence arrangements, strong ring-fencing, transparent cost allocation and explicit preservation of contestable metering and data roles. The costs of any DNSP involvement should be recovered from users of the service rather than from all electricity consumers.</p> |
| <p>3. Is additional guidance required in the NER on:</p> <ul style="list-style-type: none"> <li>a. how the boundaries between regulated and contestable (unregulated) services should be drawn?</li> <li>b. how to accommodate the new DSO role for DNSPs?</li> </ul>                                                                                                                                                                                                                             | <p>a. PLUS ES propose that the NER should include an explicit presumption in favour of contestability wherever a workable competitive market exists or is emerging. Regulated service classification should be reserved for services exhibiting clear natural monopoly characteristics or where a demonstrated market failure exists. The Rules should explicitly recognise metering, metering coordination, metering data, communications and settlement services as contestable functions regardless of asset ownership.</p> <p>b. The DSO role should be underpinned by principles of competitive neutrality, information access equivalence and the preservation of contestability. While DSOs may require access to operational data to support network functions, this access should not extend to ownership, control or administration of contestable services. DSO functions should complement, rather than replace, existing competitive market frameworks for metering, communications, data and NMI services. Maintaining clear separation between regulated DSO activities and contestable market services will be critical as CER, flexibility services, EV charging and new market arrangements continue to evolve..</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>4. Are there any other issues with the current service classification arrangements that you think we should consider in this Review?</p>                                                                                                                                                                                                                                                                                                                                                       | <p>The existing Chapter 7 and FTA SSP frameworks already provide clear, competitive allocation of metering, data and measurement responsibilities. PLUS ES considers that future reforms should maintain these arrangements and avoid establishing precedents that extend DNSP control of metering, data or communications services. These reforms were specifically designed to support emerging technologies and should be allowed to operate as intended.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5. Are any other changes to the regulatory framework required to support the increasing importance of efficient and effective coordination between NSPs and other market participants?                                                                                       | Yes. Increasing coordination between networks and market participants will require standardised interfaces, data protocols and information-sharing arrangements. Equal and non-discriminatory access should be provided to accredited parties to ensure future DSO functions do not create competitive advantages for DNSPs or their affiliates.                                                                                                                                                                                                                               |
| <b>QUESTION 3   Are changes required to the ring-fencing arrangements?</b>                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 1. How effective do you think the ring-fencing obligations have been to date, in terms of preventing the cross-subsidisation of contestable activities and discriminatory behaviour? What changes, if any, are required to ensure they remain fit-for-purpose in the future? | Current ring-fencing arrangements have been effective in mature markets and have enabled the development of contestable metering services. However, emerging markets require stronger obligations relating to data access equivalence, information sharing, cost allocation transparency and compliance reporting.                                                                                                                                                                                                                                                             |
| 2. How effective do you think ring-fencing waivers have been to date in promoting the long-term interests of consumers? What, if any, changes do you think should be made to ensure they remain fit for purpose into the future?                                             | Waivers have enabled useful trials and innovation. However, conditions should be standardised, time limited and transparent, subject to clearly defined criteria and supported by public reporting; where a service warrants an enduring DNSP role, classification through a rule change is the better instrument than successive waivers. Any waiver should be subject to robust non-discrimination requirements across connections, site access, hosting capacity information, technical requirements, service delivery timeframes and procurement processes.                |
| 3. Are there any other problems with the ring-fencing arrangements or ring-fencing waivers that you think we should consider in this Review?                                                                                                                                 | The most significant emerging issue is information and data access equivalence. Recent ring-fencing waiver processes have highlighted stakeholder questions regarding how future information access arrangements should operate as DNSPs assume broader DSO responsibilities. As DNSPs assume greater DSO related responsibilities, clear obligations related to data access, information sharing and non-discrimination will become increasingly important. Increased transparency of ring-fencing compliance outcomes may also improve confidence in competitive neutrality. |
| 4. Do you think that there would be any change in the number of applications for ring-fencing waivers if there was more clarity around what services are distribution services and what services are not distribution services?                                              | PLUS ES supports greater clarity in service classification arrangements, as a significant proportion of waiver applications arise from uncertainty regarding the boundary between distribution and contestable services. Clearer regulatory boundaries would reduce the need for waivers and minimise the potential for disputes.                                                                                                                                                                                                                                              |
| <b>QUESTION 4   Are changes required to the connection and/or facility access arrangements?</b>                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 1. Do you think the current connection and/or facility access arrangements are acting as a barrier to entry into contestable markets? If so, how?                                                                                                                            | PLUS ES considers that connection timeliness, cost opacity and non-standardised pole and facility access terms are the principal practical barriers to third-party kerbside EVCI deployment.                                                                                                                                                                                                                                                                                                                                                                                   |
| 2. Do you think changes are needed to the regulatory framework for negotiating connections and/or facility access arrangements? If                                                                                                                                           | PLUS ES considers that changes to the regulatory framework would improve the efficiency and consistency of connection and facility access arrangements. Proposed changes include: <ul style="list-style-type: none"> <li>• Standardised, published facility access terms and pricing;</li> <li>• Binding connection timeframes with public reporting; and</li> </ul>                                                                                                                                                                                                           |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| so, what changes are required?                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>A faster dispute resolution pathway to support smaller providers.</li> </ul> <p>Consistent and transparent access arrangements will improve competition and lower deployment costs for emerging EV and CER services.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3. Are there any other service regulation related issues with the connection and/or facility access arrangements that you think we should consider in the review                                                                                                                                                                                                                                                                                                                                    | PLUS ES considers that information access equivalence is an important area for further consideration. Hosting capacity information, pole availability and network capacity information should be made available to all eligible market participants on consistent, transparent and non-discriminatory terms to support efficient investment, competition and timely deployment of emerging services.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>QUESTION 5   Are changes required to the cost allocation and/or shared asset arrangements?</b>                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1. Do you think that changes should be made to the cost allocation and/or shared asset arrangements? If so, what changes are required?                                                                                                                                                                                                                                                                                                                                                              | PLUS ES considers that changes to the cost allocation and shared asset arrangements are warranted. Cost allocation should be transparent and auditable at asset level for multi-service assets, with AER approval where the allocation materially affects contestable markets.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2. How do you think the costs and benefits associated with assets, such as community batteries, should be accounted for when making cost allocation decisions?                                                                                                                                                                                                                                                                                                                                      | Costs should be allocated according to clear identifiable value streams and the benefits derived from each service. Contestable market services should bear an appropriate share of costs to avoid cross-subsidisation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3. Do you think that the allocation of costs for shared assets should be revisited over time? Please explain your answer.                                                                                                                                                                                                                                                                                                                                                                           | Cost allocations for shared assets should be reviewed periodically to ensure they continue to reflect actual asset utilisation, service benefits and value streams as usage patterns evolve over time.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4. Do you think that the current approach to cost allocation and shared asset arrangements, if maintained, should extend to negotiated services                                                                                                                                                                                                                                                                                                                                                     | PLUS ES supports similar cost allocation principles should apply to negotiated services where regulated assets are used to provide facility access or support contestable markets. This is becoming increasingly relevant for EVCI asset rental and other infrastructure access arrangements. Consistent treatment helps ensure that regulated asset funding does not provide an unintended advantage in adjacent contestable markets, including EV charging, metering, communications and data services.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>QUESTION 6   Nexa rule change request - Do the ring-fencing arrangements in the NER need to be strengthened?</b>                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1. Do you agree with Nexa's framing of the issues raised in its rule change request? Why/why not?<br>2. Do you think that there are any deficiencies in any of the following areas of the distribution ring-fencing arrangements that need to be addressed? If so, what are the deficiencies and how material are they: <ul style="list-style-type: none"> <li>a. ring-fencing waiver conditions</li> <li>b. affiliate dealings and data access</li> <li>c. branding and cross-promotion</li> </ul> | <p>PLUS ES supports targeted enhancements where evidence demonstrates that existing arrangements may not adequately address future DSO related information access and competitive neutrality risks. As DNSPs take on a greater DSO function and gain access to increasing volumes of operational and customer related data, robust non-discrimination and information-equivalence obligations become more important.</p> <p>However, PLUS ES does not support a presumption that DNSP participation in emerging markets is inherently anti-competitive. DNSPs should be able to own and operate regulated infrastructure where this delivers consumer benefits, provided clear safeguards prevent cross-subsidy, preferential treatment and encroachment into contestable services.</p> <p>Core ring-fencing protections should be embedded in the NER, while operational requirements remain within the AER guideline framework. The priority should be preserving competition in contestable services such as metering, NMI services, communications, data and charging operations, rather than restricting infrastructure ownership models.</p> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>d. financial resilience ring-fencing</p> <p>e. reporting, complaints and enforcement transparency?</p> <p>3. Do any of the problems that Nexa has identified in relation to the distribution ring-fencing arrangements also apply to the transmission ring-fencing arrangements</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Waivers should remain available, but should be transparent, evidence-based, time limited and subject to review. Waivers should not be used to transfer contestable functions, including metering, NMI, data or communications services, into the regulated DNSP domain.</p> <p>In addition, future ring-fencing arrangements should recognise the emerging Type 8 and SSP FTA framework and ensure that DSO access to CER and SSP information does not displace contestable NMISP, MC, MP or MDP functions.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>QUESTION 7   Nexa rule change request - Would Nexa's proposed solution address the identified problem?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>1. Do you consider that Nexa's proposals would most efficiently address the issues identified in the rule change request? Why/why not?</p> <p>2. What are your views on Nexa's proposals to:</p> <p>a. change the ring-fencing governance arrangements by elevating core ring-fencing obligations and waiver conditions into the NER?</p> <p>b. amend the NER to only allow ring-fencing waivers as a last resort?</p> <p>c. address other potential deficiencies in the current ring-fencing arrangements?</p> <p>3. If core ring-fencing obligations were to be elevated into the NER as proposed by Nexa, what ring-fencing obligations do you think should be specified in the NER and what should be left to the AER's ring-fencing guidelines?</p> <p>4. Are there any other implementation-related matters that we would need to consider if Nexa's proposed rule change were to be made (e.g. timeframes or grandfathering existing ring fencing waivers)?</p> <p>5. Do you think Nexa's proposed solution should only apply to the distribution ring-fencing arrangements, or should it also apply to the</p> | <p>PLUS ES supports:</p> <ul style="list-style-type: none"> <li>• The intent of the Nexa proposal, particularly where it seeks to improve confidence in competitive neutrality through stronger non-discrimination, information equivalence and transparency obligations. As emerging services develop and DNSPs assume greater DSO responsibilities, participants require confidence that access to information, services and infrastructure will be provided on equivalent terms; and</li> <li>• Elevating core ring-fencing obligations into the National Electricity Rules. Obligations relating to non-discrimination, information and data access equivalence, accounting separation, waiver criteria and enforcement provisions should be contained within the NER, while implementation detail should remain within the AER Ring-Fencing Guideline. This approach provides greater regulatory certainty while retaining flexibility to adapt to changing market conditions.</li> </ul> <p>However, PLUS ES does not support the proposed 'last resort' waiver test as drafted. The key issue is not DNSP participation itself, but whether appropriate safeguards exist to prevent discrimination, cross-subsidy and the leveraging of monopoly advantages into contestable markets. A transparent net consumer benefit test, supported by open-access obligations, competition safeguards and transparent cost allocation arrangements, would be preferable to a near-prohibition on DNSP participation.</p> <p>Where an enduring DNSP roles is justified, it should be established through the service classification framework and formal rule change processes, rather than through repeated reliance on waivers. Such arrangements should include enforceable open-access obligations and explicit preservation of contestable market functions.</p> <p>Importantly, any changes to the ring-fencing framework should preserve contestable Chapter 7 services, including metering coordination, metering provision, metering data services, NMI services, communications and data functions. DNSP ownership of infrastructure should not result in DNSP ownership or control of these contestable market roles. The recently implemented Type 9 framework and forthcoming Type 8 / SSP FTA arrangements already provide competitive and accountable frameworks for these services.</p> <p>The same principle should apply to the forthcoming Type 8 and Secondary Settlement Point framework. Ownership of CER assets, operation of orchestration platforms or access to SSP information should not confer control over NMI creation, NMI standing data, market settlement or accredited NMISP functions.</p> <p>Existing waivers should be grandfathered until expiry, with any future extensions assessed under revised requirements. Any transition to a</p> |

|                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| transmission arrangements?                                                                                                                                                                                                                                                         | strengthened framework should provide sufficient time for affected parties to implement compliance and reporting arrangements. A distribution first approach is appropriate, although a common principles framework across both transmission and distribution should be the longer term objective.                                                                                  |
| 6. Are there alternative solutions that would more efficiently address the identified problem and that would be more consistent with the NEO that you think the AEMC should consider? If so, describe what those solutions are and how they would be more consistent with the NEO. | In summary, PLUS ES supports strengthening ring-fencing protections, transparency and information equivalence obligations, but does not support measures that effectively prohibit DNSP participation where clear consumer benefits can be demonstrated. The objective should be to preserve competition in contestable services, rather than restrict ownership of infrastructure. |

#### QUESTION 8 | Nexa rule change request - What are the costs and benefits of Nexa's proposed solution?

|                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8. What do you consider the costs and benefits of Nexa's proposed solution, including the risks and benefits of elevating ring-fencing obligations into the NER | <p>PLUS ES supports strengthening core ring-fencing protections and considers there are clear benefits in elevating key obligations into the NER.</p> <p>Potential benefits include:</p> <ul style="list-style-type: none"> <li>• Greater regulatory certainty for market participants;</li> <li>• Improved investor confidence in emerging EV and CER markets;</li> <li>• Stronger protections against discrimination and cross-subsidisation;</li> <li>• Greater transparency regarding DNSP participation in contestable markets and</li> <li>• Increased confidence in competitive neutrality as DNSPs assume broader DSO responsibilities.</li> </ul> <p>Potential risks include:</p> <ul style="list-style-type: none"> <li>• Reduced flexibility to respond to emerging technologies and market developments;</li> <li>• Increased compliance and administration costs;</li> <li>• Delays to innovative projects if waiver processes become overly restrictive; and</li> <li>• Preventing efficient DNSP participation where clear consumer benefits can be demonstrated.</li> </ul> <p>PLUS ES considers the preferred outcome is a balanced framework that strengthens competition protections and transparency while retaining flexibility for beneficial DNSP participation where appropriate safeguards are in place.</p> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### QUESTION 9 | ENA rule change request - Do you agree with ENA that there is a problem with the roll out of EVCI?

|                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Do you think that there is a 'chicken and egg' problem with EVs and kerbside EVCI? If so: | PLUS ES does not dispute that limited availability of kerbside charging may constrain EV adoption for consumers without access to off-street parking. However, from a metering perspective, there is no equivalent 'chicken and egg' problem. The Type 9 framework commenced on 31 May 2026 specifically to support eligible kerbside and street-furniture charging installations and already provides a fit-for-purpose framework for commissioning, maintenance, measurement, settlement and market accountability. Any deployment challenge relates to infrastructure deployment and commercial viability, rather than metering capability. |
| a. how material do you think this problem is?                                                | The issue appears material in the near term, particularly in metropolitan areas with high levels of on street parking and in locations where commercial deployment remains challenging.                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

|                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| b. do you think it is a permanent or temporary problem?                                                                                                                                                                                                                                            | PLUS ES considers the issue largely transitional. As EV adoption grows, utilisation rates and commercial investment incentives are likely to improve. The challenge relates to infrastructure deployment and utilisation rather than market settlement or metering capability.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| c. do you think the problem is limited to:<br>i. kerbside AC slow charging (<24kW), or does it apply more generally to other forms of EVCI, including DC fast charging (>24kW)?<br>ii. particular locations (e.g. regional areas) or does it apply in all locations, including metropolitan areas? | i. The issue appears most pronounced for lower-utilisation kerbside AC charging, where commercial returns may be less attractive. DC fast charging generally has a stronger standalone business case.<br>ii. The challenge exists across both metropolitan and regional areas, although regional and low-density locations are likely to experience the greatest commercial barriers to deployment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| d. how do you think this problem could be best addressed and do you think this should be funded by electricity consumers or other mechanisms?                                                                                                                                                      | PLUS ES is neutral on charging asset ownership and supports approaches that accelerate efficient deployment while preserving competition. From a metering perspective, no additional solution is required. Programs designed to support charging deployment should utilise existing contestable metering arrangements, including Type 9 where applicable, rather than establishing alternative metering pathways or DNSP metering roles. Any funding mechanisms should focus on infrastructure deployment, not metering services, which remain contestable and should continue to be procured through the competitive market.                                                                                                                                                                                                                                      |
| 2. Are there any other problems or barriers that you think third party providers might face in developing kerbside EVCI that could be addressed through the NER?                                                                                                                                   | PLUS ES understands that connection timeframes, connection costs, site identification processes and facility access arrangements may create challenges for charging infrastructure providers.<br><br>However, PLUS ES does not consider metering to be one of those barriers. Type 9 commenced on 31 May 2026 and was specifically designed to support these use cases. It provides accountable MC, MP and MDP roles, compliant installation and maintenance arrangements, and an auditable settlement pathway. PLUS ES has been unable to identify a specific metering problem that proposals for DNSPs to become Metering Providers are attempting to solve.<br><br>Whether charging infrastructure is deployed by DNSPs, CPOs or other market participants, the existing contestable Chapter 7 framework should remain the pathway for metering and settlement. |
| 3. Do you think that DNSPs could roll out kerbside EVCI at a lower cost and faster rate than other providers, if the proposed rule were made? If so, why do you think DNSPs have this advantage over other third party providers?                                                                  | DNSPs possess legitimate deployment advantages through existing pole infrastructure, field workforce capability, procurement scale and established maintenance programs. These advantages may support faster and lower-cost deployment of passive charging infrastructure.<br><br>However, these deployment advantages do not extend to metering services. Accredited Metering Coordinators, Metering Providers and Metering Data Providers already operate within a competitive market and are capable of supporting DNSP-owned, CPO-owned or independently owned charging assets. DNSP participation in infrastructure deployment does not require DNSP participation in metering.                                                                                                                                                                               |
| 4. How do you think the market for the provision of public EV charging                                                                                                                                                                                                                             | PLUS ES expects the market to evolve into a layered model comprising multiple ownership and service arrangements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| services is likely to evolve over time?                                                                                                                                                                                                                                 | <p>DNSPs may own and maintain passive charging infrastructure in some circumstances, while private CPOs continue to invest in and operate their own charging networks. There may be multiple NMIs with Multiple FRMPs being able to access and serve their customer base. Regardless of ownership, the customer-facing and market-facing layers should remain contestable.</p> <p>This includes charging services, retail services, communications services, metering services and data services. Type 9 already provides the framework for measurement and settlement of eligible kerbside charging installations, and PLUS ES considers future market development should build upon this contestable framework rather than introduce DNSP-controlled metering models.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>QUESTION 10   ENA rule change request - Would the ENA's proposed solution address the identified problem?</b>                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 1. Do you consider the ENA's proposal to amend the NER to enable DNSPs to install, own and maintain EVCI and to provide distribution EVCI services on an open access basis would most efficiently address the issue identified in the rule change request? If not, why? | <p>PLUS ES supports DNSP ownership, installation and maintenance of passive charging infrastructure where it delivers consumer benefits and accelerates deployment outcomes. However, ownership of charging infrastructure should not alter the contestable nature of charging services, metering services, communications services, data services or NMI functions.</p> <p>Existing Type 9 arrangements already provide a fit-for-purpose framework for measurement and settlement of eligible kerbside charging installations, and future market design should build upon these arrangements rather than create alternative metering pathways.</p> <p>PLUS ES supports measures that accelerate deployment of kerbside EVCI and is neutral on ownership of the charging asset, provided the contestable service layers remain intact. The sale of electricity and charging services should remain contestable and available on open access terms, and metering, settlement, communications and data services should continue to be delivered through the existing Chapter 7 framework. DNSPs may undertake physical installation and maintenance activities under contract to an accredited MP, consistent with current public lighting arrangements, without becoming the appointed metering provider.</p> |
| 2. Do you consider that the distribution EVCI service identified by ENA should be a 'distribution service' (i.e. a service provided by means of, or in connection with, a distribution system)? Why/why not?                                                            | <p>PLUS ES considers the passive charging asset, where mounted on or connected to distribution network infrastructure, can appropriately be classified as a service provided in connection with a distribution system. However, the classification should be tightly confined to the physical infrastructure itself. Charging services, retail services, metering, data services, communications services and settlement arrangements should sit outside the classification and remain contestable. The Commission should avoid creating any precedent that links ownership of charging infrastructure with ownership or control of metering services.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3. Do you have any feedback on the proposed requirement for a DNSP to develop a deployment strategy? Would any additional regulatory oversight be required?                                                                                                             | <p>The deployment strategy should be subject to appropriate AER oversight and provide transparency on site selection criteria, deployment priorities, open access arrangements, charging service provider access, and how contestable metering, communications and data services will be procured. The strategy should also confirm that DNSP ownership of charging infrastructure does not alter the existing contestable appointment process for MC, MP and MDP roles.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4. If the ENA's proposed rule change was to be made, do you think any constraints or time-limits should be imposed?                                                                                                                                                     | <p>The focus should be on behavioural safeguards rather than arbitrary deployment limits: enforceable open access requirements, information equivalence and non-discrimination obligations, periodic AER review of deployment outcomes, transparent cost allocation and explicit preservation of contestable metering, communications and data services. With these protections in place, the Commission should not need to rely on strict volume caps or time based limitations.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

|                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>5. Do you agree with the proponent's proposal that DNSPs should be able to recover costs in the current regulatory control period through a reopener if they wish to provide EVCI in the current period? Why/why not?</p>                                                      | <p>If DNSPs are permitted to provide distribution EVCI services, PLUS ES does not oppose a reopener mechanism as a funding tool, particularly where it may facilitate timely investment without requiring stakeholders to wait until the next regulatory period. However, it is important that:</p> <ul style="list-style-type: none"> <li>• Expenditure should remain subject to full prudence and efficiency assessment;</li> <li>• Metering costs should not form part of any regulated cost recovery mechanism; and</li> <li>• Metering should continue to be procured through contestable market arrangements rather than included in regulated DNSP expenditure.</li> </ul> <p>This would remain consistent with the existing Chapter 7 framework and preservation of metering contestability.</p> |
| <p>6. Economic regulation can, in some cases, be beneficial in establishing service standards and outcomes that deliver the services required by customers. Do you consider that would be a potential benefit of ENA's proposed solution in the case of kerbside EVCI?</p>        | <p>Regulated service standards may assist in ensuring availability, reliability and maintenance outcomes for the physical charging asset. Customer facing matters, including charging services, retail pricing, customer experience, metering services and data services, should remain subject to competition and consumer choice.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p>7. Are there alternative solutions that would more efficiently address the identified issues and be more consistent with the NEO that you think the AEMC should consider? If so, please describe the solutions and explain how they would be more consistent with the NEO.</p> | <p>PLUS ES sees the ENA proposal as complementary to other reforms rather than a standalone solution. In parallel, the Commission should continue to pursue connection process reform, facility access reform, open access infrastructure arrangements, competitively neutral grant funding and full utilisation of the Type 9 framework. No alternative metering framework is required. Any remaining barriers to deployment are primarily infrastructure, connection, access or commercial barriers rather than metering barriers.</p>                                                                                                                                                                                                                                                                 |

#### QUESTION 11 | ENA rule change request - What are the costs and benefits of ENA's proposed solution?

|                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1. What do you consider the direct and indirect costs and benefits over the short and longer term would be of the ENA's proposal to amend the NER to enable DNSPs to roll out EVCI and to provide EV charging service providers open access to EVCI services?</p> | <p>PLUS ES considers the primary benefits of the ENA proposal relate to infrastructure deployment rather than market settlement or metering. They include faster deployment of kerbside charging through use of existing DNSP assets, field workforce and operational capability, improved access to charging for customers without off street parking, more efficient utilisation of existing network infrastructure, and acceleration of EV adoption and associated emissions reduction benefits.</p> <p>The principal risks are cross-subsidisation between regulated and contestable services, leveraging of DNSP infrastructure advantages into adjacent competitive markets, reduced incentives for private investment where DNSP funded assets compete directly with third party providers, and the potential for ownership of charging infrastructure to become linked with ownership of metering, communications or data services. These risks can be addressed through enforceable open access arrangements, ring-fencing obligations, transparent cost allocation and continued contestable appointment of MC, MP and MDP roles.</p> |
| <p>2. Do you think these costs and benefits would differ depending on whether the</p>                                                                                                                                                                                | <p>The classification of distribution EVCI services as either a Standard Control Service or an Alternative Control Service has important</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

|                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>AER classifies the service as a standard control service or an alternative control service? Are there any other interdependencies (e.g. with government policies) that we should take into account?</p>                                                                                       | <p>implications for competition, cost recovery and long-term market development.</p> <p>PLUS ES considers an Alternative Control Service classification is likely to better support competitive neutrality because costs are recovered from users of the service rather than being broadly socialised across electricity consumers. This approach preserves stronger incentives for efficient deployment while reducing the risk of regulated funding being used to displace competitive infrastructure investment.</p> <p>Regardless of classification, metering costs should remain outside the regulated cost recovery framework and continue to be recovered through existing contestable market arrangements. As outlined in PLUS ES's ERC0436 submission, metering is already a contestable service under Chapter 7 and should not be incorporated into regulated EVCI expenditure or the RAB.</p> <p>PLUS ES does not consider there is any justification for socialising the costs of metering services through regulated charging arrangements where competitive procurement mechanisms already exist and are functioning effectively.</p> <p>The Commission should consider the interaction between:</p> <ul style="list-style-type: none"> <li>• ERC0436 (Commonwealth funded EVCI);</li> <li>• ERC0435 (ENA EVCI proposal);</li> <li>• ERC0437 (Nexa ring-fencing proposal);</li> <li>• Flexible Trading Arrangements;</li> <li>• Type 9 metering; and</li> <li>• Type 8 and SSP frameworks.</li> </ul> <p>PLUS ES propose the Commission ensure a consistent policy outcome across all reforms.</p> <p>In particular:</p> <ul style="list-style-type: none"> <li>• DNSP ownership of charging assets should not alter contestable metering arrangements;</li> <li>• Charging asset ownership and metering ownership should remain separate concepts;</li> <li>• Chapter 7 roles should remain contestable and</li> <li>• Type 9 should remain the primary framework for eligible kerbside charging installations.</li> </ul> <p>Any outcome that permits DNSP ownership of charging infrastructure should continue to preserve independent appointment of MCs, MPs and MDPs through the existing market framework.</p> |
| <b>QUESTION 12   Assessment criteria</b>                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>Do you agree with the proposed assessment criteria, which would be used for both the Nexa and ENA rule change requests and the Review? Are there any additional criteria that you think the Commission should consider, or are there criteria that you consider are not directly relevant</p> | <p>PLUS ES broadly supports the proposed assessment criteria. However, we consider the Commission should place greater weight on contestability, competitive neutrality and the preservation of recently implemented market reforms.</p> <p>The assessment framework should not focus solely on whether a proposal may accelerate deployment of EV charging or other emerging technologies. It should also consider whether the proposal duplicates existing market frameworks, displaces established contestable roles, transfers competitively deliverable services into the regulated DNSP domain, or results in higher overall costs for consumers through inefficient duplication of services and regulated cost recovery.</p> <p>In particular, the Commission should assess whether proposals:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>to the issues likely to be considered in the rule change requests or the Review?</p> | <ul style="list-style-type: none"> <li>• Preserve contestable market roles where effective frameworks already exist, including MC, MP, MDP, NMI Service Provider, communications and data services;</li> <li>• Maintain a clear separation between regulated infrastructure and contestable market services. Ownership of an asset should not determine who performs metering, data, communications, settlement or NMI functions;</li> <li>• Avoid unnecessary duplication of recent reforms, including the Type 9 framework, Flexible Trading Arrangements, Type 8 metering and SSP arrangements;</li> <li>• Promote competitive neutrality and ensure DNSPs do not gain an advantage in contestable markets through access to monopoly infrastructure, information or cost recovery mechanisms; and</li> <li>• Support future DSO functions without displacing accredited market participants or reducing customer choice.</li> </ul> <p>PLUS ES also considers that any proposal seeking to change existing market roles should be supported by clear evidence of a regulatory gap or market failure. In the case of kerbside EV charging, PLUS ES has not identified a metering issue that requires the creation of a DNSP metering role or an alternative pathway to the existing Chapter 7 and Type 9 frameworks.</p> <p>PLUS ES supports DNSP ownership and deployment of infrastructure where it delivers consumer benefits. However, infrastructure ownership should not automatically extend to metering, communications, data, NMI or other contestable services. The preferred outcome is a framework that supports efficient infrastructure investment while preserving competition, customer choice and the established market roles that already exist.</p> |
|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|