



Rewiring Australia - Submission to ENRR Package 1 and related rule change requests

Project references: EPR0106 (Review); ERC0435 (Nexa); ERC0437 (ENA)

Our position in short

Rewiring Australia judges this framework by one test: does it help Australia electrify and decarbonise faster? On that test, the priority for Package 1 is **mid-scale** distributed energy resources (DER) - public EV charging, neighbourhood batteries, and warehouse, barn and paddock solar - which needs to be built in far greater volume, far faster, than the connection process currently allows. Accelerating the connection process will reduce costs and stimulate the market for EV charging and other mid-scale DER, without the need for networks to roll it out.

We recommend the Commission:

1. **Make mid-scale connections fast and standard.** A sub-5MW solar-and-storage project or a kerbside charger should connect through a standardised, largely automated assessment in weeks - not through twelve to eighteen months of bespoke study. Flexible (non-firm) connections should be a default option, and facility access should be on standard published terms.

2. **Measure connection performance publicly** - volumes, timeframes against standard, firm versus non-firm. Networks cannot be held to a connection standard no one measures.
 3. **Answer the "what services" question with a simple principle:** the network's job is the powerpoint, not the appliance. Networks provide and are accountable for connection, access, data and coordination; the market competes in the services on top.
 4. **Make open network data a duty, not an encouragement** - low-voltage hosting-capacity maps and pole-suitability data, published for everyone at once.
 5. **Carry pace of connection as an explicit lens** through the prioritisation framework and assessment criteria.
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The missing middle

The household layer of the transition is, broadly, efficient from a network perspective. Rooftop solar, home batteries and home EV chargers connect under standard arrangements and are scaling quickly. Utility-scale projects, for all their frictions, get bespoke project management that eventually lands them.

The gap is everything in between - the mid-scale infrastructure the next phase of the transition depends on:

- **public EV charging**, which lets people without off-street parking switch to electric;
- **neighbourhood and community batteries**, which soak up local solar and defer augmentation;
- **warehouse, barn and paddock solar** - sub-5MW "energy farmer" generation that could be built in months if the connection path allowed it.

These projects are too big to plug in like a house and too small to justify a bespoke connection campaign. Today they face a process built for neither: slow, firm-by-default, augmentation-gated and opaque. Fixing that process is, in our view, the single highest-value thing this Review can deliver.

The recently finalised distribution planning reforms (ERC0410), which we support, do not close this gap: better twenty-year plans and hosting-capacity data help networks *document* the future, but they do not change what networks deliver. This Review should do the other half of the job: establish timely sub-5MW connections as a core network service, along with accountability processes.

Q4 Connection and facility access: the core reform

(We take Q4 first because, in our view, it reframes most of this package.)

Yes - connection and facility access processes are acting as a barrier to entry, and the evidence is in the regulator's own reporting. The AER's *Export services network performance report 2025* finds that where augmentation is required, the capital contribution "can cause projects to be delayed or abandoned"; that facility access terms are non-standard and costly; and that flexible connection options remain marginal and largely trial-stage. Developers of sub-5MW solar-and-storage report twelve to eighteen months of connection lead time, much of it bespoke, manually-run studies for what are highly repeatable projects. The bottleneck is substantially *process, not physics*.

We urge the Commission to consider reforms that would:

- **Standardise and automate connection assessment for defined mid-scale project classes** - public EV charging, neighbourhood batteries, sub-5MW solar-and-storage - so repeatable connections run through fast standard processes, not bespoke studies.
- **Make non-firm / flexible connection offers a default option**, so new load and generation can connect against available headroom with agreed curtailment rather than waiting on augmentation. (The incentive to offer flexibility rather than augment belongs to Package 2; the availability of the product as a standard option is a Package 1 principle.)
- **Standardise facility access** - a model agreement and transparent, cost-reflective terms.
- **Require public connection-performance reporting** - volumes by connection type, timeframes against standard, firm versus non-firm. Networks cannot be held to a connection standard no one measures. We note the one statutory instrument built to measure this - the *Export services* report under NER 6.27A - published its 2025 edition without its core performance dataset, as the data was "not available in time." The scorecard exists; it is not yet producing the numbers. The Commission should also consider the appropriate frequency for this reporting.

Faster, standardised, flexibility-capable connections, with open capacity and site data, would go a long way to solving the viability problems of privately-led public charging. This would help every provider, not one class of provider. Delivering timely connection approvals has the potential to stimulate the market, break the deadlock and avoid the need to make changes to networks' ringfenced services.

Q2 What services should networks provide?

Our answer is a simple principle: **the network's job is the powerpoint, not the appliance.** Networks should provide and be accountable for fast connection, open access, the data the market needs, and neutral coordination of distributed resources. Competition happens in the services delivered on top. The consultation paper's own decomposition of services into network-facing and market-facing components points the same way.

Applied to the questions:

- **Boundary guidance (Q2.3a):** classify emerging services by which side of that line they sit on - enabling layer or market layer - rather than case by case, waiver by waiver.
- **The DSO role (Q2.3b, Q2.5):** as DNSPs become distribution system operators, coordination of distributed resources becomes a core enabling service. The framework currently does not regulate the quality, neutrality or effectiveness of that coordination at all; it should.
- **Timing (Q2.1):** classification locked in years ahead and not updated for five to seven years is inappropriate for fast-moving mid-scale services. More responsive classification is in consumers' interests.

Two applications of the principle that would unlock the missing middle:

- **"Energy farmers":** standardised, automated connection assessment for sub-5MW solar-and-storage directly attacks the lead times that deter this investment.
- **"Urban renewable energy zones":** apply the REZ idea at the distribution level - the network plans and builds pockets of hosting capacity ahead of need, and mid-scale generation and storage connect into them, rather than negotiating one-off augmentation-gated connections.

About Rewiring Australia

Rewiring Australia is a non-profit research and advocacy organisation dedicated to representing the people, households and communities in the energy system. We deliver practical climate progress by working with government, industry, and communities to electrify everything. Co-founded in 2021 by Dr Saul Griffith and Dan Cass, Rewiring Australia highlights the positive climate and economic outcomes possible for Australia, and the world, with electrification of fossil fuel machines. www.rewiringaustralia.org

In addition to co-founding Rewiring Australia, Saul Griffith is also the co-founder and Chief Scientist of Rewiring America. [Rewiring America](http://www.rewiringamerica.org) and Saul worked closely with the Biden Administration in the drafting of the Inflation Reduction Act to drive investment in clean, electric machines and in supporting households and the larger U.S. economy to electrify.