

Shayne O'Sullivan

Australian Energy Market Commission

Submission made online at [www.aemc.gov.au](http://www.aemc.gov.au)

25 June 2026

Dear Mr O'Sullivan,

**Subject: ERC0436 Consultation Paper – Facilitating EV charging infrastructure rollout under Commonwealth grants Rule**

SA Power Networks welcomes the opportunity to comment on the AEMC's Consultation Paper on the *Facilitating EV charging infrastructure rollout under Commonwealth grants rule change* (the Rule Change) proposed by the Department for Climate Change, Energy, Environment and Water (DCCEEW).

We support the introduction of the Commonwealth's *Accelerating EV charging* program (the Program) and have collaborated with Energy Networks Australia (ENA) in the development of its submission. We support the positions put forward by ENA relating to the broad treatment of the Program within the Rules, with our further feedback focusing on the practical delivery of the Program.

The kerbside charging portion of the Program will focus on the deployment of EVCI mounted on existing poles. Whether deployed by a charge point operator or a distribution network service provider (DNSP), these deployments will likely seek to leverage the new Type 9 metering framework, allowing for the in-built meters to be used for market settlement. Under this arrangement, there is no physically separate meter – when a charger is being installed or maintained, the meter is also being installed or maintained. For sites where a DNSP installs and maintains the charger, the DNSP would also be the party installing and maintaining the meter – typically the role of a Metering Provider (MP). We thus consider that DNSPs *must* be the MP for sites where the DNSP is deploying EVCI.

Under current ring-fencing arrangements, each DNSP would need to individually apply to the Australian Energy Regulator (AER) for a ring-fencing waiver to fulfil the MP role. This would create a delivery risk for any DNSP-led rollout, as the DNSP would be unable to proceed with installation until the AER has approved the relevant ring-fencing waiver. We do not consider this to be an efficient approach, given that where even a single EVCI deployment is to be DNSP-led, the relevant DNSP would need to seek a ring-fencing waiver. Instead, we recommend that the AEMC consider including a rule to allow DNSPs to act as the MP for DNSP-owned EVCI deployments within the Program. Whilst this rule would only apply to EVCI deployments within the Program, this issue will be present for any DNSP-led EVCI deployments, and we recommend that the AEMC consider the need for a more fulsome solution in future.

We look forward to continuing to engage with the AEMC to deliver the lowest cost whole-of-system approach to enabling the energy transition. Should you have questions on any aspect of our submission, please contact Liam Mallamo, Industry Development Lead, at [liam.mallamo@sapowernetworks.com.au](mailto:liam.mallamo@sapowernetworks.com.au).



Ben Birch

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