05/11/2026

Shayne OSullivan
Project Lead
Australian Energy Market Commission

Dear Ms OSullivan,

Facilitating EV charging infrastructure rollout under Commonwealth grants – Draft Determination (ERC0436)

Energy Networks Australia (ENA) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) Facilitating EV charging infrastructure rollout under Commonwealth grants draft determination.[1]

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. ENA's members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA welcomes the draft rule to enable the Commonwealth's $40 million Accelerating EV Charging Program, which would deliver about 14,000 chargers across Australia. For many households, there are additional barriers to owning an electric vehicle (EV) due to a lack of at home charging capabilities, locking out key groups, such as renters, apartment residents and regional drivers, from accessing the cost savings and opportunity to reduce their own emissions. Improving charging accessibility helps make EV ownership more accessible for a broader cohort of society and can provide benefits to non-EV owners through increased network utilisation.

In summary, ENA:

- Supports the AEMC making the rule as drafted, so the program can proceed,
- Considers the AEMC's break-even analysis conservative, and asks it to give weight to benefits beyond emissions reduction, including equity of access, network utilisation and downward pressure on network charges,
- Considers that the program's Charge Point Operator (CPO)-first, distribution network service provider (DNSP)-last-resort design is appropriate for this program to balance delivering broad charging locations, supporting commercial incentives and ensuring identified consumer needs are not left unmet,
- Seeks confirmation that program expenditure will be assessed under the incentive schemes against the forecast each DNSP tendered in the grants process,
- Asks that cost recovery reflect the economic life of program assets, and
- Urges an enduring framework so program assets are not left stranded once the program ends.

[1] AEMC, Facilitating EV charging infrastructure rollout under Commonwealth grants - Draft Determination, 24 September 2026.

1. ENA supports the boost to public charging availability

ENA is strongly supportive of the draft rule to enable the Commonwealth electric vehicle charging infrastructure (EVCI) grant program. It is a key initiative to increase public EVCI availability, reducing the public charging gap and increasing accessibility of EV ownership. The program is designed to address identified gaps in public charging, utilising commercial delivery wherever possible and targeting DNSP delivery where it is not. Public charging is key to providing consumer confidence to switch to EVs, supporting the decarbonisation of transport and realisation of potential cost savings for households and wider benefits for electricity consumers.

Increasing public availability of EVCI is a way to improve accessibility to EV adoption. Currently, convenient EV charging and ownership is limited to drivers with access to off-street charging capabilities, which creates barriers for renters, apartment dwellers, and many other customers. Public charging extends that option to every driver and provides all with the confidence charging is available when needed.

EV adoption also represents a significant cost savings opportunity. Analysis by L.E.K. Consulting, commissioned by ENA, shows customers can save approximately $2,500 per year by switching to an EV.[2] Public charging provides all customers additional confidence to make the switch from Internal Combustion Engine (ICE) vehicles to EVs, reduce fossil fuel reliance, and access a significant cost savings opportunity.

The draft rule rightly recognises Australia's 'chicken and egg' problem. EV uptake is still too low to justify CPOs investing in charging where there are few EVs, while consumers lack confidence that charging will be available to justify buying an EV. This program provides a boost to public charging to break the chicken and egg problem, ensuring there is and every consumer knows public charging is available.

Both EV ownership and EVCI are increasing, but not at a pace to meet net zero targets and Australia significantly lags the rest of the world. In 2025, the estimated Australian average of EVs per public charger was approximately 41 EVs, compared to the global average of 11.[3] This is down from 45 in 2024, showing improvement in public charging availability, but it is still almost four times higher than the global average, highlighting how far Australia has to go.

Public charging must also keep pace with the increasing adoption of EVs. The proportion of new cars that were EVs in Australia was 1% in 2020, growing to 15% in 2025.[4] AEMO's Integrated System Plan (ISP) expects that by 2050, 80% of vehicles on the road will be EVs under its Step Change scenario.[5] As of June 2026, there are 11,602 public charging connectors.[6] While this program provides a kickstart, to keep pace with the global average of public chargers, to meet charging demand, and provide the opportunity to adopt to all households, public charging will need to grow substantially above current installation rates. This calls for an enduring solution for EVCI deployment beyond this program.

ENA recognises this government grant program is a short-term measure to boost the availability of EVCI for all types of customers, but there is a need for an enduring solution. The experience and evidence generated through the program should inform the AEMC's separate consideration of any enduring regulatory framework through the Electricity Network Regulation Review.

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[2] LEK and Energy Networks Australia, *The Time is Now: Getting smarter with the grid*, 2024.
[3] International Energy Agency, Global EV Outlook 2026, pg. 112, May 2026.
[4] Ibid.
[5] AEMO, 2026 Integrated System Plan, Executive Summary, p.9, June 2026
[6] Electric Vehicle Council, State of Electric Vehicles 2026, 30 June 2026.

2. AEMC analysis supports targeted program – but should capture all the potential consumer benefits

The AEMC's analysis shows that the program does not depend on a large or certain behavioural response to produce net benefits. The analysis shows only a modest incremental increase in EV uptake is required, approximately 1.5 to 3.8 additional EVs per DNSP-delivered kerbside AC charger (and 21 to 46 per regional DC charger over 10 years), for the assessed benefit of reduced emissions to outweigh the costs under the National Electricity Objective (NEO). The scale of the program and the amount recoverable from electricity consumers are capped, limiting potential costs. The AEMC considers the results for kerbside AC are inconclusive, but ENA considers the analysis conservative because only emissions reduction benefits are counted. Accounting for additional quantifiable benefits, and recognising other material benefits qualitatively, would further strengthen the assessment.

The AEMC should recognise the access benefits of public EVCI for renters, apartment residents and regional consumers. The NEO does not require every benefit to accrue directly or uniformly to every customer. Improved access to lower-cost total energy bills is a material consumer outcome that should be considered alongside program costs and the potential wider benefits.

The NEO considers price, and the AEMC should consider the potential impact of higher EV adoption to network charges. Greater EV ownership can increase network utilisation, regardless of where the EV ends up being charged. Increased electricity demand spreads the fixed revenue over a larger energy base and places downward pressure on network charges per unit of throughput for all customers. Energy Consumers Australia (ECA) estimates suggest increased EV uptake can benefit customers without an EV too, potentially being $500 better off every year by 2050 from increased network utilisation.[7]

The AEMC has estimated a bill increase of $1 per year for a typical customer to deliver the rollout of EVCI under this grant program. Ausgrid, a metro NSW DNSP, estimates that increasing the number of EVs in its network to 389,000 would lead to network charges falling by around $14 per customer per year by 2029. This analysis is not specific to the program, but it shows that utilisation benefits from EV uptake are material. Even a modest contribution from the program to EV uptake among drivers without off-street parking would produce benefits that should be weighed against the estimated $1 cost.

Further cost benefits can be achieved when charging occurs during off-peak periods. While Australia's uptake of EVs is still in the 'early adopters' phase, evidence shows EV owners tend to charge most during off-peak times. If this behaviour continues, and as public charging tariffs and pricing signals encourage off-peak use, it can make even greater use of excess network, lowering network prices and total energy costs for all customers.[8]

ENA questions the assumption that kerbside AC chargers delivered under this program would be installed without dedicated EV parking. Participants are learning from early trial results and continuing to improve the rollout of AC, which may include a greater effort to establish dedicated parking where this is shown to have customer value. The value of dedicated bays is also likely to change over time. Councils are more likely to designate kerbside EV bays as EV numbers grow, so a benefit discount based on current parking arrangements may understate benefits over the life of the assets.

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[7] Energy Consumers Australia, *Stepping Up: A smoother pathway to decarbonising homes*, Figure 6, 2023.

[8] HoustonKemp, *Creating accessible and affordable public EV charging networks for Australia*, pg. 16-18, July 2025.

3. Competition must be preserved in the evolving EVCI market

The EVCI market is still evolving, and competition must be preserved as it develops. Stakeholders disagree on what form this should take, and ENA considers a mix of delivery models is required. Providing customers options in EVCI types, e.g. AC and DC, and retailers through an open access model supports competition. The market should not rely solely on CPO-delivered EVCI, which may lack competition at the retail/service level and additional network capex to install, nor solely on DNSP-delivered EVCI. Most important is diversity of location to support all consumers, which the breadth of DNSPs' network coverage can support.

Under the program, CPO investment is given priority, to support the growth of the commercial market. At kerbside sites, commercial providers receive the first opportunity to invest, and DNSP installation occurs only as a last resort. Regional investment is separately confined to approved areas with limited commercial prospects as determined by the program coordinator. This sequencing preserves opportunities for commercial delivery while ensuring that an identified customer need is not left unmet due to commercial incentives.

ENA considers the open access model is essential to keeping prices of delivered EVCI fair in the long term for customers. The model promotes competition at the retail/service level of EVCI, as opposed to other forms of EVCI where one business provides the infrastructure and retail services. A greater proportion of EVCI with open access models places downward pressure on charging costs for customers. While many customers may prefer faster DC charging, low-cost AC options give customers more choices in charging and makes charging at prices closer to home retail prices available for a wider range of customers.

DNSPs are actively looking at new ways to reduce connection times for new DC connections. These connections are complex, often requiring network augmentation. Preliminary research from ENA members shows networks typically issue connection offers within four to six business days of a valid application. Most of the end-to-end connection time sits in the build phase after the offer, which involves a number of parties and steps, including customer acceptance, design, approvals, customer works and retailer service orders. Reducing overall connection times will need coordinated effort across all of these.

The program's benefit also extends to regional areas where the investment incentive for CPOs is weaker. It supports more equal access to charging for customers who live in or travel through regional areas by addressing locations where expected utilisation is insufficient to attract timely commercial investment. ENA considers regional EVCI key to reducing charging wait times during peak holiday periods as well.

4. Cost recovery arrangements

ENA is supportive of the draft rule within period transitional cost adjustment, which more accurately reflects the program costs. This will better account for inflation, the rate of return and operating expenditure, consistent with the treatment of any other network investment.

ENA seeks further clarity on the interaction of EVCI delivered through this program and incentive schemes. The AER should apply the incentive schemes, the Capital Expenditure Sharing Scheme (CESS) and the Efficiency Benefit Sharing Scheme (EBSS), to expenditure within this program. ENA seeks confirmation in the final rule that the AER will measure program expenditure against the forecast each DNSP tendered in the grants process, so a DNSP that delivers to its tendered forecast is not penalised in the next period.

Cost recovery should reflect the economic life of program assets, which will differ by technology. The draft leaves economic life to be determined through the cost adjustment process, and ENA supports this rather than assuming a fixed life. With lives of seven years or more, kerbside AC assets installed

shortly before a reset may span two subsequent regulatory determinations. The arrangements should not assume cost recovery is completed within a single determination, regardless of when assets are installed.

5. Need for an enduring framework

The AEMC has not made a decision on the end-of-life treatment of DNSP-delivered EVCI in its draft rule. Some assets installed under the program are likely to remain capable of providing services beyond 30 June 2029. ENA considers there is a need for an enduring solution for assets delivered under this grant program to avoid otherwise serviceable assets becoming stranded. The final framework should therefore provide a clear pathway for the continued operation, transfer, reclassification or retirement, as appropriate, providing certainty while preserving the AEMC's separate consideration, through the Electricity Network Regulation Review, of any broader enduring role for DNSPs in EVCI deployment.

If you wish to discuss any of the matters raised in this response further, please contact Victoria Baikie, Senior Regulatory Analyst, on vbaikie@energynetworks.com.au.

Yours sincerely,



Dominic Adams
Chief Operating Officer