5 Nov 2026

Ms Anna Collyer
Chair Australian Energy Market Commission

Dear Ms Collyer,

Facilitating electric vehicle charging infrastructure under Commonwealth grants Draft Determination (ERC0436)

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

PLUS ES is a registered Metering Coordinator (MC) and accredited Metering Provider (MP), Metering Data Provider (MDP) and Embedded Network Manager (ENM) in the NEM, providing metering services across Australia to retailers and large customers. We also have practical experience deploying kerbside Electric Vehicle Charging Infrastructure (EVCI), including under an AER waiver and as a grant recipient under the NSW EV Kerbside Charging Program as an MC, MP and MDP for third party owned charger solutions with integrated metering.

We support the accelerated deployment of kerbside and regional blackspot EVCI under the Commonwealth's Accelerating EV Charging Program (the Program), including a targeted, time-limited DNSP role as provider of last resort. The Program should address identified barriers to EVCI deployment without creating a parallel regulated metering model where a functioning competitive market already exists. Doing so risks duplicating existing capability and imposing avoidable costs on electricity consumers. Hence, we support retaining the existing Chapter 7 contestable metering framework and believe it should apply consistently, irrespective of the EV charging technology selected or the Program Coordinator's preferred approach.

PLUS ES considers that the accelerated EVCI deployment can be achieved while preserving competition, investment incentives and efficient outcomes for consumers consistent with the National Electricity Objective (NEO) and recommends that the following principles should guide the final determination:

- **Preserve Chapter 7 contestability.** There is no identified failure in the existing contestable metering framework that warrants displacement of MC, MP or MDP services. Metering associated with Program EVCI should therefore remain subject to Chapter 7 contestable arrangements, irrespective of EVCI ownership or delivery model;
- **Separate EVCI ownership from metering services.** Network connection and EVCI asset provisioning are distinct from MC, MP and MDP functions. Technical integration or Program Coordinator discretion should not provide a pathway to replace contestable MC, MP and MDP arrangements with Program DNSP provision or EVCI owner provision of those services as standard control services. The AEMC's flexible trading framework already allows in-built measurement capability in EV chargers to be used under contestable arrangements;
- **Avoid duplicating by leveraging existing market capability.** Contestable providers already maintain the systems, infrastructure and capability required to deliver metering and metering data services. Replicating those functions through DNSPs would require the relevant capability to be built or procured again, unnecessarily duplicating capability that already exists within the competitive market;
- **Protect customers from unnecessary regulated costs.** Existing competitive capability should be leveraged rather than duplicated through Program expenditure and recovered through regulated charges. The efficiency and customer-cost implications should be considered before determining the scope of the approved Program activities;
- **Do not allow technology to determine market structure.** Technology selection or the integration of measurement capability within EV chargers should not determine who provides metering services. The flexible trading framework provides a mechanism for in-built measurement capability to operate within contestable arrangements. Technical integration should therefore not, of itself, justify transferring MC, MP or MDP functions to DNSPs or EVCI owners; and

- **Preserve competitive neutrality, investment incentives and clear market boundaries.** Maintaining contestable metering supports continued competitive investment, innovation and efficient service delivery. Program arrangements for EVCI connection, commissioning, asset management, operation, transition or transfer should remain clearly separated from contestable metering functions, including following any subsequent change in EVCI ownership or operation.

Further detail and recommendations are provided in Appendix A. PLUS ES welcomes further discussions in relation to this submission or any other item relating to the topic.

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

Yours sincerely,



Andrew Divitaris
PLUS ES – Director Business Development & Strategy

APPENDIX A – PLUS ES SUPPORTING INFORMATION

PLUS ES provides the following details to support our key points for the AEMC's consideration.

1. TARGET INTERVENTION TO DEMONSTRATED EVCI DEPLOYMENT BARRIERS

PLUS ES supports the objective of accelerating EVCI deployment and recognises the role of the Program in addressing identified barriers in regional blackspots and high-density metropolitan areas.

Regulatory intervention should, however, remain targeted to the barriers constraining EVCI deployment. Challenges associated with the commercial viability, connection or rollout of charging infrastructure do not, of themselves, demonstrate a corresponding market failure in metering.

Nor do those challenges establish a need to extend DNSP activities across the full value chain from network connection and EVCI asset provision through to metering and market settlement.

The Program design already recognises that infrastructure ownership and service provision can be separated. In metropolitan areas, Charge Point Operators (CPOs) are to have the first opportunity to take up identified sites. Where a DNSP acts as provider of last resort, it would still appoint a CPO and/or e-Mobility Service Provider (EMSP) to supply electricity and charging services to EV users. Similar separation applies to customer-facing services at regional installations.

PLUS ES considers that the same principle should inform the treatment of metering. Responsibility for the network connection or physical charging asset should not determine responsibility for services that can continue to be provided through established competitive market arrangements.

The existence of barriers to EVCI deployment should therefore not lead to an assumption that end-to-end DNSP delivery will necessarily provide the most efficient outcome. Alternative delivery models should continue to leverage existing competitive capability where those services can be efficiently delivered by the market.

2. PRESERVE CONTESTABLE METERING UNDER CHAPTER 7

PLUS ES welcomes the AEMC's recommendation that the existing contestable metering framework in Chapter 7 should be maintained for EVCI installed under the Program. However, PLUS ES does not support making contestability conditional on whether the Program Coordinator considers contestable metering to be possible, including having regard to the EVCI technology selected.

The draft determination would allow Chapter 7 to apply unless the Program Coordinator includes metering within the approved Program activities. If relevant metering roles are included, the Program DNSP could perform those roles as standard control services and recover the associated costs from electricity consumers without obtaining a ring-fencing waiver. This creates a material risk that the EVCI technology or delivery model selected under the Program could determine whether established contestable metering arrangements continue to apply.

PLUS ES considers that metering associated with EVCI Program should remain contestable irrespective of the ownership or delivery model applying to the charging infrastructure. EVCI ownership and metering service provision are separate considerations. DNSP, CPO or other ownership of EVCI should not confer responsibility for associated metering services or preclude appropriately qualified parties from providing MC, MP and MDP services.

The network connection, supply and asset provisioning of EVCI are similarly distinct from the provision of metering and metering data services. The existence of technical or operational integration between EVCI and measurement equipment should not, without further justification, establish that those services must be provided by the same entity. Maintaining this separation also preserves incentives for competitive providers to continue investing in metering capability, innovation and efficient service delivery, rather than creating uncertainty as to whether contestable services may progressively be incorporated into regulated Program activities.

Recommendation: The final rule should expressly preserve the existing Chapter 7 contestable arrangements for MC, MP and MDP services associated with Program EVCI, irrespective of who owns or operates the EVCI, and exclude those services from approved Program activities treated as standard control services.

TECHNOLOGICAL INTEGRATION

Technology selection should support, rather than unnecessarily restrict, the existing contestable framework. The AEMC has identified uncertainty as to whether the EVCI technology selected will permit separate ownership and operation of metering equipment and separate performance of MC, MP and MDP roles.

Based on our practical experience, PLUS ES does not consider physical or technological integration, including in-built measurement capability, sufficient to establish that these roles cannot be performed contestably. Physical integration of equipment and responsibility for regulated market roles are separate considerations.

The flexible trading framework provides a relevant mechanism for accommodating integrated measurement capability within Chapter 7. The Unlocking CER benefits through flexible trading rules (ERC0346) introduced type 8A, 8B and 9 metering installations to enable market participants to use in-built measurement capability in technology such as EV chargers and smart streetlights, with the MC, MP and MDP roles performed under Chapter 7. Type 9 arrangements have applied since 31 May 2026 and type 8 arrangements since 1 November 2026. PLUS ES currently performs MC, MP and MDP roles for EV chargers owned by third parties, obtaining settlement data from the charger's embedded metering.

Where a particular EVCI design is considered incompatible with contestable delivery, the relevant technical constraint should be demonstrated before departing from Chapter 7, including consideration of whether it can reasonably be addressed through technical specifications, interoperability, access arrangements or contractual allocation of roles. Program technical specifications and procurement requirements should require EVCI solutions to support the existing contestable MC, MP and MDP arrangements. Where a proposed design cannot accommodate those arrangements, an alternative compliant design or delivery model should be selected rather than creating an exception to contestable metering.

SUPPORTING MARKET ARRANGEMENTS

The separation of EVCI ownership from competitive services is consistent with an open-access approach, under which ownership of charging infrastructure need not require the infrastructure owner to provide all associated services. Contestable metering arrangements already operate where MCs and MPs do not own every component comprising the metering installation, including CTs, VTs and associated secondary circuits. Accordingly, integrated or third-party-owned equipment does not inherently prevent the allocation of MC, MP and MDP responsibilities to contestable providers.

The flexible trading and Victorian arrangements provide further examples of network responsibilities, infrastructure ownership and newer metering arrangements being treated separately while retaining contestability. For example, Victoria's definition of a 'relevant metering installation', meaning the distributor-only MC restriction applying to relevant metering installations does not extend to these metering types.

Recommendation: The final rule and Program guidelines should state expressly that physical or technical integration of measurement capability within EVCI does not, of itself, require the MC, MP or MDP roles to be performed by the EVCI owner or the Program DNSP.

ESTABLISHED CONTESTABLE CAPABILITY AND EFFICIENCY

Contestable metering providers such as PLUS ES have already invested in systems and capabilities in remotely communicated metering, metering data and market settlement services, supported by telecommunications capability, field resources, market systems, compliance arrangements and service coverage across metropolitan, urban and regional areas.

Requiring DNSPs to perform equivalent functions could duplicate existing market capability. A DNSP would need either to procure those services from an established provider or develop the systems, operational capability and supporting business architecture required to perform them.

This is also relevant to consumer outcomes. The draft determination provides for participating DNSPs to recover a proportion of efficient approved Program costs from electricity consumers. Where competitive capability already exists, leveraging that capability should be considered before establishing parallel arrangements supported through regulated cost recovery. This is not simply a question of who can technically provide the service. It is also an efficiency question: whether consumers should fund additional regulated capability where the market has already invested to provide that capability competitively.

Recommendation: Before any metering role is included in approved Program activities, the Program Coordinator should be required to assess whether the service can be procured from accredited contestable providers at lower cost to consumers, and to publish that assessment.

3. TREATMENT OF METERING AS AN APPROVED PROGRAM ACTIVITY

AEMC have indicated in their draft determination that the Program will determine if metering is included in the scope of the EVCI Program[1] - where metering is not included in approved Program activities, Chapter 7 applies. Conversely, where an MC, MP or MDP role is included, that role would be treated as a standard control service for ring-fencing and cost-recovery purposes.

PLUS ES does not support the Program Coordinator having discretion to treat MC, MP or MDP services as approved Program activities undertaken as standard control services. The Program and transitional rules should facilitate EVCI deployment without creating an alternative regulated pathway for services already provided through the contestable metering market. Technology selection, infrastructure ownership and delivery arrangements should accommodate the existing Chapter 7 framework rather than determine whether it applies.

A demonstrated barrier to deploying charging infrastructure does not, of itself, establish a need to displace competitive metering services. Any technical integration or access requirements should be addressed through Program design, procurement specifications and contractual arrangements that preserve contestable appointments.

This is important for three reasons:

- there is no identified failure in contestable metering that the Program is seeking to remedy;
- moving established functions into regulated Program activities could duplicate existing capability and introduce costs ultimately recovered from consumers; and
- allowing Program decisions to displace contestability could weaken incentives for continued competitive investment in metering capability and innovation.

The Program and AEMC should also preserve competitive neutrality between DNSP-led and CPO-led delivery. Targeted support for otherwise unserved charging locations should not provide DNSPs with an additional regulatory advantage in associated contestable services. Allowing metering services to be treated as standard control services and recovered from electricity consumers could favour DNSP-led delivery over CPO investment using existing contestable arrangements, potentially weakening incentives for private investment.

Recommendation: The final rule should exclude MC, MP and MDP services from approved Program activities treated as standard control services and preserve the existing contestable appointment arrangements.

Should the Program Coordinator propose including an MC, MP or MDP role in approved Program activities, the final rule should require safeguards to prevent unnecessary displacement of contestable services, including:

- Identify the specific technical or regulatory constraint preventing contestable delivery;
- Demonstrate why it cannot reasonably be addressed through technical specifications, interoperability, access arrangements or contractual allocation of roles;
- Consider existing contestable capability and comparative consumer-cost impacts;
- Publish the basis for the departure; and
- Limit any departure to the affected sites and necessary Program period.

4. MAINTAIN A CLEAR BOUNDARY BETWEEN EVCI AND CONTESTABLE METERING

PLUS ES supports the proposed treatment of EVCI connection, take-up and commissioning activities required to facilitate the Program. These activities must, however, remain clearly distinct from contestable metering functions. Support for these activities does not extend to treating MC, MP or MDP services as standard control services or assigning those roles to a Program DNSP by virtue of its involvement in the Program.

The final framework, including transitional arrangements, should distinguish between network connection and supply, EVCI ownership and asset activities, customer-facing charging services, and the MC, MP and MDP functions governed by Chapter 7.

Responsibility for EVCI installation, commissioning, operation, asset management, transition or transfer, including integrated measurement functionality, should not of itself extend to associated MC, MP or MDP roles. Maintaining this boundary throughout the operating life of the asset will support continuity of contestability and avoid EVCI ownership or operational changes inadvertently altering the market arrangements applying to metering services.

[1] Noting the Commission recommend to the Program Coordinator that the current metering framework is maintained.

This distinction should be reflected consistently in approved Program activities, contracts, technical specifications and implementation arrangements. Any change in EVCI ownership or operation should preserve these arrangements and continuity of compliant metering and metering data services.

Recommendation: The final rule should expressly distinguish EVCI activities from MC, MP and MDP services and preserve the existing contestable metering arrangements throughout the installation's operating life, including following any change in EVCI ownership or operation.