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PLUS ES Trial Waiver Application

Submission via email: regulatorysandbox@aer.gov.au

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AGL Response to PLUS ES Trial Waiver Application

AGL Energy (AGL) welcomes the opportunity to comment on the PLUS ES Trial Waiver Application (**Trial application**).

Proudly Australian for more than 185 years, AGL supplies around 4.1 million energy services. AGL operates Australia's largest private electricity generation portfolio within the National Electricity Market (NEM), comprising coal and gas-fired generation, renewable energy sources such as wind, hydro and solar, batteries and other firming technology, and gas production and storage assets. We are building on our history as one of Australia's leading private investors in renewable energy to now lead the business of transition to a lower emissions, affordable and smart energy future in line with the goals of our Climate Transition Action Plan.

AGL supports PLUS ES's trial waiver application to exempt the trial from the separate metering requirements as set out under the National Electricity Rules. The Kerb-side Electric Vehicle (EV) charging trial project is an important initiative that aims to create greater convenience for those already with EVs and reduce barriers to future adoption.

As a part of this broader trial project, AGL has partnered with PLUS ES to expand New South Wales EV Charging network by installing 149 public chargers.

In light of the AEMC's *Unlocking CER benefits through flexible trading rule change*, the future metering rules will likely enable this metering proposal. These reforms will be an important step in reducing metering costs where a compliant settlement grade meter can be integrated into a charging device. This will in turn enable new CER product offerings and future energy services to the benefit of customers.

As noted in the trial application, importantly this trial waiver can facilitate the added benefit of providing learnings to support AEMO, and the industry, with the upcoming amendments to AEMO metering requirements and procedures. These insights will be valuable proof points as to what AEMO changes are needed and whether further issues require further investigation.

We consider the 5-year term of the trial waiver is appropriate as the proposed exemptions relate to both the installation and ongoing operation of the meters. Whilst AGL has partnered with PLUS ES for the initial stage of the EV charging roll-out, we note that further stages of the roll out are open to competitive tender.

If you have any queries about this submission, please contact [REDACTED] on [REDACTED] or [REDACTED].

Yours sincerely,

[REDACTED]
General Manager, Policy and Market Regulation