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Lyndal Bubke
Australian Energy Regulator

Submitted via email: regulatorysandbox@aer.gov.au

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Dear Lyndal,

Ausgrid submission to the AER's Consultation on the PLUS ES Trial Waiver Application [AER Reference AER212772]

Ausgrid is pleased to provide this submission in support of the proposed sandbox waiver to allow PLUS ES to install meters inside of EV chargers in NSW and South Australia using an innovative metering solution.

Ausgrid supports deploying EV charging infrastructure in our network

Ausgrid operates the electricity distribution network that powers the homes and businesses of more than 4 million Australians living and working in an area that covers over 22,000 square kilometres from the Sydney CBD to the Upper Hunter in New South Wales.

Ausgrid is actively encouraging public EV charging infrastructure (**EVCI**) in our network. Electrifying the transport sector is critical to meet state and federal emissions objectives and significantly increasing the number of EVs on our roads will help to reduce greenhouse gas emissions from vehicles.

EVs will also lower running costs for drivers. However, the lack of public EVCI is a major factor cited for people being reluctant to purchase EVs.¹ Based on the Australian Energy Market Operator's (**AEMO's**) 2024 Integrated System Plan forecasts, around 566,000 EVs are expected in our network area by 2030. Around 30% of households in the Ausgrid area do not have access to at-home charging and will rely on public charging infrastructure.

Australia lags behind international benchmarks for deploying EV chargers. According to the International Energy Agency, the world average is 1 charger for every 11 EVs, whereas Australia has 1 charger for every 68 EVs. For example, the Netherlands is a leader in EV Charging with 1 charger for every 5 EVs.² This demonstrates the need for more charging installations. Innovative solutions, such as PLUS ES's proposal can help make pole mounted chargers cheaper to install and maintain, which in turn improves the

¹ For example Australian Automotive Dealer Association (AADA) EV & Hybrid Vehicle Insights Report https://www.aada.asn.au/wp-content/uploads/2024/02/AADA-Wave-2-EV-Research-Report_Final.pdf and Yougov, referenced in <https://switchedon.reneweconomy.com.au/content/most-australians-think-there-are-too-few-public-charging-stations-to-support-evs>

² International Energy Agency; Global EV Outlook 2024 – Trends in Electric Vehicle Charging <https://www.iea.org/reports/global-ev-outlook-2024/trends-in-electric-vehicle-charging>. Because the volume of EV sales is outpacing installations of EVCI, Australia's ratio of EVs per charger has deteriorated from 35 EVs per charger in the IEA's 2023 report, to 68 EVs per charger in the 2024 report.

business case for charge point operators (**CPOs**) to deploy chargers. We hope that this will lead to more EVCI installation on our network to unblock a key barrier to EV uptake.

Ausgrid is actively supporting customers with EV connections on their sites and on council land. We are also facilitating various types of EVCI installations on our assets with partners including JOLT, Evie Networks, EVX, PLUS ES and local councils. We currently have 70 pole mounted chargers on our network, with further chargers to be installed through the NSW Government's EV kerbside charging grants program.

Ausgrid encourages the AER's Board to approve the trial and addendum

Ausgrid supports PLUS ES's trial waiver application and the associated addendum for the following reasons. The proposed trial enables:

- **More cost and time efficient pole mounted EVCI installations:** The trial represents the first step towards cheaper and easier to deploy pole mounted kerbside AC EVCI as PLUS ES' innovative metering proposal will remove the need for a separate metering enclosure on top of the charger box. Lower cost and faster installations will help to increase EVCI installations and support increased uptake of EVs by customers.
- **Improved visual amenity:** As kerbside chargers under Round 1 of the NSW Government's EV kerbside charging grants program have started to be deployed on our poles over the last few weeks, we are hearing from residential customers through council consultations or through works notifications that customers are unhappy about the size of the metering box above the charger. The trial will improve the social licence for pole mounted AC EVCI on our network as it will enable CPOs to install chargers with both the NMI meter and the charger meter within the same installation.
- **Learnings will inform updates to AEMO's Metrology Procedure:** AEMO is developing updated Metrology Procedure following the Australian Energy Market Commission's (**AEMC**) final determination on the 'Unlocking CER benefits through flexible trading' rule change proposal. This trial will generate practical information that can inform the revised Metrology Procedures.
- **Trialling innovative metering arrangements on different networks using different poles:** PLUS ES's addendum diversifies the learnings and therefore increases the benefits to consumers and industry from trialling this metering arrangement. For example, extending the waiver to 1,000 chargers (from the original application's 500) and to SA (rather than limiting it to NSW) will allow for learnings on EVCI in composite poles, streetlight columns and Stobie poles, and not just wooden poles. It will also provide learnings on different climate conditions and different network obligations and operations.

Ausgrid is satisfied that the waiver conditions will enable it to approve these installations on our poles

We have met with PLUS ES, as one of the distribution network service providers and the network asset owner of the poles that would host the EVCI. We support trialling the metering arrangements proposed as PLUS ES is using a pattern approved Type 4 meter.

We agree the proposed trial should include a waiver from Schedule 7.5 of the Minimum Service Specifications as the nature of the customer (eMobility Service Provider) is more characteristic of a large customer than a small customer and so does not need the same specifications.

For further information on this submission, please contact [REDACTED] Senior Policy Advisor via [REDACTED]

Yours sincerely,

[REDACTED]

Head of Regulation