



EVX would like to communicate some concerns with the trial waiver application made by Plus ES regarding pole mounted EV charging.

In principle we do not have an issue with the outcomes that the trial seeks to achieve around metering and reducing the cost and complexity for providers to install the kind of infrastructure proposed.

We do however have grave concerns with the overall size and length of time that the waiver is being proposed for.

Plus ES is a commercial entity, of whom will stand to benefit greatly from any trial waiver which equates to a commercial and competitive advantage. We support the activity and the regulators efforts to look at innovative trials in the space, we do not however feel it is necessary to demonstrate a simple metering device and its ability to function to a satisfactory level over 500+ sites. This appears to be stretching the purpose of the regulatory sandbox to include mass commercial activity.

We are also concerned that PLUS ES have applied for this waiver for a period of 5 years. This seems excessive and any findings from the trial waiver should be made available to the regulator far sooner given the simplicity of the proposed waiver and associated activity. The goal should ultimately be to deliver this proposed benefit to the broader industry far more quickly should the regulator decide a change is appropriate.

In addition to the concerns above we also understand that the trial waiver proposed will still need to overcome regulations such as state service and installation rules, which we have previously and unsuccessfully sought to adjust or seek dispensation on.

The regulations that are specifically problematic for this waiver application include:

NSW Service and Installation rules, which clearly state in multiple areas that the service enclosure must not be more the 2m from the ground. This is primarily there to ensure that the DNSP inspector or worker has safe and easy access (1 person) to this location for emergencies, isolations and maintenance works.

4.2 Location and Accessibility of Service Equipment - Provide a vertical clearance of not less than 2 metres from the ground, platform or floor and minimum horizontal clearance of not less than 0.6 metre from the: i) Equipment mounted on the hinged panel; or ii) External front edge switchboard enclosure

4.3 Unsuitable locations - In addition the following locations are considered unsuitable for mounting service equipment and individual isolation devices: (i) Where the use of a ladder would be necessary.



4.7.2 Location of Service Protection Devices – (d) Locate the service protection device no higher than 2.0m to the top of the device and no lower than 0.5m to the line side terminals (excluding any connection flags used) of the device above the ground floor or platform.

In Ausgrid standards below if the pole must be climbed there is a series of procedures that must be carried out before you can that will require additional time and risk than if the switchboard was located between 0.6-2m.

Ausgrid NS126 Inspection Procedure for working on poles

1. If the pole is not CCA type installed less than 15 years ago you are required to excavate to a depth of 350mm to inspect the pole. This is made even harder when the pole is located in bitumen or concrete footpaths.
2. Some poles have Bioguard bandages. Precautions should be taken to avoid contact with the skin and eyes. When handling a Bioguard bandage or a Ausplast bandage synthetic rubber/PVC gloves or nitrile disposable gloves must be worn.

As per **Ausgrid' ESR's (Electrical Safety Rules)** there would be a requirement for additional staff and equipment if the switchboard is not located between 0.6-2m -

- Additional equipment – fibreglass ladder, harness, pole top rescue kit which all require inspecting and testing. Shovel & crowbar to excavate
- Additional personnel – Stand-by person trained in pole top rescue, or EWP with stand-by person with EWP license.
- Additional site requirements – Traffic and pedestrian control for ladder or EWP access

Plus ES have stated that there would be no requirement for a separate metering enclosure on the pole but in fact this is incorrect as the meter currently sits in the service enclosure which is still required to include service fuses, neutral links and main switch.

With all of this in mind we are supportive of the meter type component of the trial however factoring in the current service and installation rules. We do not see any need to add unnecessary safety risks by locating service equipment in a PUMS style connection above the allowable height for service equipment under the current NSW service and installation rules.

Finally we would also ask for transparency, within the context of this trial, considering PLUS ES are the unregulated subsidiary of Ausgrid, around the costs being imposed for facilities access upon Plus ES. Our concerns here are a potential abuse of a mechanism designed for innovation, for commercial gain and competitive advantage. Visibility and



transparency around the cost to PLUS ES for the costs of accessing Ausgrid assets during this trial go some way to alleviating these concerns.

Regards

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EVX Australia Pty Ltd