



## **EVC response to the AER – PLUS ES trial waiver consultation**

**November 2024**

**With reference to:**

[PLUS ES trial waiver application open for consultation | AER - Regulatory Sandbox](#)

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**With contribution from:**

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## Preamble

The Electric Vehicle Council (EVC) is the national body representing the electric vehicle industry in Australia. As the market is emerging in Australia, our work is particularly aimed at increasing certainty for investment through policy, knowledge sharing and education.

The Australian Energy Regulator (AER) is the national regulator for electricity and gas supply in Australia. The AER has responsibility for regulation of energy networks, protecting the interests of consumers through the enforcement of the National Energy Retail Law.

PLUS ES is a metering coordinator, part-owned by Ausgrid under ringfenced arrangements.

## Introduction

The EVC supports 'regulatory sandboxing' to bolster innovation in a safe way and potentially bring about better and/or cheaper ways of doing things.

The consultation note (the paper) describes PLUS ES's primary objective is to trial an innovative metering solution for pole mounted kerbside EV chargers that may improve the cost and efficiency of EV charger installation with minimal impacts on users.

The EVC notes that this trial waiver could be in place for up to 5 years and involves the installation of up to 1000, 7-22kW pole mounted EV chargers in NSW and SA.

## The waiver

The trial seeks to install EV chargers with in-built metering, whereas normally a type 4 meter would need to be installed upstream of the device, within an enclosure. This may simplify, speed and reduce cost of kerbside EVSE installations, but not the EVSE itself.

EVC members noted the use of the acronym 'PUMS' (permanently unmetered supply) in Diagram 2, p20 of the paper, which implies that there may be no retailer involved.

The EVC sought clarification from the AER who received confirmation from PLUS ES that the inclusion of the acronym PUMS was in error, and there is in fact a retailer in the proposed process, in line with the rest of the paper.

The EVC also sought advice from the AER as to whether the waiver could be extended to other charge point operators (CPOs). The response was that waivers are specific to the applicant, but the AER is happy to consider waiver applications from other CPOs and their relevant entity, such as the registered metering service provider.

The requested waiver appears to specifically relate to the manner of deployment of the type 4 meter associated with the connection.

## Transparency

Another consideration for the trial waiver is whether it would be reasonable to require the licencing arrangement (commonly referred to as a facilities access agreement) between: Ausgrid and PLUS ES, SAPN and PLUS ES, for the use of the poles to be made public.

Our members tell us they are interested in learning what constitutes fair and reasonable facilities access agreements across jurisdictions. We expect transparency on this matter would support future deployments of EV charging in settings like this, so we would ask that the details of the Facilities Access Agreement be made public as a condition of the waiver being provided.

## Conclusion

The EVC is supportive of the trial, on the basis that the request is simply around metrology arrangements and does not appear to create a meaningful risk of damage to the market structure supporting public EV charging deployments.

With the above request of publishing the licencing arrangement considered, this can be a very useful trial waiver in accelerating the transition.

The EVC is happy to discuss any of the above and contact can be made to [██████@evc.org.au](mailto:██████@evc.org.au)