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Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

Submitted electronically: regulatorysandbox@aer.gov.au

Consultation Notice – PLUS ES Trial Waiver Application (AER212772)

Endeavour Energy appreciates the opportunity to express our support for PLUS ES's trial waiver application which seeks to utilise metering capabilities embedded within electric vehicle (EV) chargers as part of a program to deploy up to 1000 kerbside EV chargers mounted on poles and streetlight columns owned by the NSW Distribution Network Service Providers (DNSPs) and SA Power Networks.

Most of these deployments will be partially funded by grants awarded through the NSW Government's EV kerbside charging grants program and will be located in defined areas in NSW identified as priority zones. Several of these zones are within our distribution network area and once installed, will provide increased charging options for our EV customers with limited or no access to off-street parking.

Like our own regulatory sandboxing trial, PLUS ES's proposal represents an innovative metering solution capable of delivering efficient outcomes that cannot be achieved under existing arrangements. Specifically, it will reduce the upfront capital and ongoing metering maintenance costs, enabling EV customers to benefit from lower cost EV charging services. By removing the need for separate metering on poles and streetlight columns, it would also improve neighbourhood streetscapes and amenity, and avoid metering enclosures that may otherwise present a hinderance to employees working on network assets.

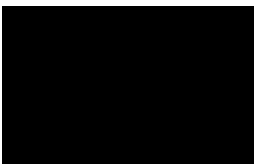
We note the proposal aligns closely with the AEMC's *Unlocking CER benefits through flexible trading* rule (August 2024) which revealed that enabling in-built metering for kerbside EV chargers could deliver an estimated \$22m in net benefits. A trial waiver would allow a portion of these benefits to be realised prior to the rules for in-built metering for public EV chargers (i.e., Type 9 meters) commencing on 31 May 2026.

Granting a PLUS ES a waiver provides an opportunity for the trial to demonstrate "proof of concept" and allow the insights gained to guide the updates required to AEMO's procedures to support the objectives of the rule and encourage take up of in-built metering in other applications including smart streetlighting and customer energy resources.

Sharing the trial learnings more broadly would also allow EV charge point operators to assess the feasibility of different EV charging technologies and promote collaboration and coordination across the industry to develop cost-effective public EV charging models that are adaptable to specific regions, network characteristics and community needs and preferences.

For any further enquiries, please contact [REDACTED], EV Innovation Manager at Endeavour Energy via email at [REDACTED].

Yours sincerely



General Manager Future Grid and Asset Management