

22 November 2024

Danielle Chifley
General Manager, Policy
Australian Energy Regulator
CC: Regulatorysandbox@AER.gov.au

RE: PLUS ES trial waiver application

Dear Ms Chifley

Tesla Motors Australia Pty Ltd (Tesla) welcomes the opportunity to provide the Australian Energy Regulator (AER) with a response to PLUS ES's trial waiver application. We appreciate the value of the Energy Innovation Toolkit as a key function to help navigate complex regulatory frameworks in the energy sector and spur innovation.

Tesla's global mission is to accelerate the world's transition to sustainable energy. As the world's largest vertically integrated renewable energy company, Tesla has a diverse product portfolio of electric vehicles (EVs), solar and battery storage products that cover residential, community and utility scale applications. We make products that displace fossil fuel alternatives by designing and manufacturing a fully integrated ecosystem for energy and transportation.

We support the approval of the waiver application and addendum from provisions of the National Electricity Rules to allow PLUS ES to install EV chargers with in-built metering installations that do not meet all the requirements of the Metrology Procedure to comply with relevant Australian Standards. This project has inherent merit in its ability to provide insights and learnings for the implementation of the Australian Energy Market Commission's recent final determination under 'Unlocking CER Benefits for Consumers' rule change.

As a leader in sustainable energy solutions, Tesla is committed to contributing to the development of a robust, efficient, and consumer-focused electricity market that supports the widespread integration of consumer energy resources (CER). Tesla is also uniquely positioned with a rapidly expanding EV fleet in Australia, complemented by our supercharging stations across the country. Optimising these products at both customer and fleet level offers additional opportunity to create a valuable flexible energy service – minimising future network strain in a way that provides system-wide benefits to all consumers.



Tesla is committed to regulatory reform that enables a range of use cases that will benefit consumers – those with and without CER. We partner with leading energy retailers, renewable developers, and networks, and invest across the entire supply chain, reducing electricity costs and supporting reliability outcomes at both a system and household level. This has been directly demonstrated by our virtual power plant (VPP) offerings, both in Australia through the SA VPP and overseas through the launch of Tesla Electric in Texas.

We recommend that the AER encourage PLUS ES and provide it with the autonomy necessary to test a range of technology solutions under this waiver with several partners to gain valuable implementation lessons. Ensuring industry, market bodies and policymakers can take the learnings from this trial will ensure we can all work to effectively update associated guidance which in turn, will make it easier for industry to offer innovative products and services for consumers.

Kind regards,

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Senior Energy Policy Advisor