

Evie Networks Response to AER Consultation

Ausgrid Community Power Network trial waiver application

13 September 2025

Evie Networks is Australia's largest owner-operator of public direct-current (DC) fast EV charging infrastructure. Since our establishment in 2018 we have built a national network of more than **300** charging stations and **900** bays of charging. Over the past twelve months alone our national network has delivered approximately **25 GWh** to drivers, enabling about **120 million kilometres** of zero tail-pipe emission travel for drivers of passenger cars, light commercial vehicles and an emerging cohort of battery-electric trucks.

Evie Networks welcomes the opportunity to provide feedback on Ausgrid's Community Power Network Trial Waiver Application. As Australia's leading EV Charge Point Operator, we are committed to supporting the efficient, competitive, and consumer-led deployment of Consumer Energy Resources (CER), including EV charging, solar PV, battery storage, and other distributed energy technologies.

While the Ausgrid Community Power Network Sandbox Trial application is not directly related to EV charging infrastructure, it forms part of a coordinated strategy by Distribution Network Service Providers (DNSPs) to expand their role across the CER sector through regulated ownership and control of assets. This trend raises significant concerns for competition, innovation, and consumer outcomes across the entire CER ecosystem.

We agree that DNSPs have a large role to play to enable the adoption of CER technologies. However through this proposed Sandbox trial, kerbside EV charging initiatives and other attempts to change ring-fencing rules, Ausgrid and other DNSPs are attempting to grow their monopolies and compete with their own customers.

A consistent theme across all DNSP waiver requests, trial applications and government lobbying related to CER, is the lack of consideration of alternatives to their own proposals. Instead of embarking on monopolistic behaviours, DNSPs should instead be working together with their own customers to unlock the benefits of CER, taking advantage of the efficiency, innovation, speed and scale that can only come from a vibrant, competitive market. All participants would benefit, including DNSPs, industry and especially consumers.

With little effort by DNSPs to work with their customers to remove existing barriers to CER deployment, Evie Networks cannot support Ausgrid's proposed trial. We urge the AER to reject the proposal.

Evie Networks endorses expert submissions provided by Nexa Advisory and the Tech Council of Australia, which will comprehensively outline the legal, economic, and policy shortcomings of the proposal. We highlight the following issues with the Ausgrid Sandbox trial proposal:

1. Competition and Market Integrity

The National Electricity Market (NEM) was founded on principles of competition, transparency, and efficiency. Allowing DNSPs to own and operate contestable CER assets—particularly without robust ring-fencing—risks distorting competitive markets and crowding out private investment. The trial's design, including preferential tariffs and lack of opt-out provisions, would confer unfair advantages to Ausgrid and undermine competitive neutrality.

Evie Networks has consistently advocated for stronger ring-fencing enforcement and clear separation between monopoly and contestable services. A competitive market is the only sustainable way to deliver innovation, investment, and consumer benefit in the long term.

2. Regulatory Process and Precedent

The proposal attempts to circumvent key regulatory safeguards, including the Regulatory Investment Test for Distribution (RIT-D) and the ring-fencing waiver process. The trial is not a genuine sandbox initiative to test new ideas—it is a mechanism to expand Ausgrid's Regulated Asset Base (RAB) under the guise of innovation.

Approving this trial would set a damaging precedent, encouraging other DNSPs to pursue similar expansions into contestable markets. This would erode investor confidence and undermine ongoing policy and regulatory efforts to support competitive CER deployment.

3. Consumer Protections and Transparency

The trial's scale is excessive, the cost structure is opaque, and the proposal lacks a robust cost-benefit analysis. Consumers in the trial areas cannot opt out, and the proposed dividend mechanism is underdeveloped and uncertain. These design flaws compromise consumer autonomy and risk exacerbating equity issues rather than resolving them.

Evie Networks supports consumer-led CER adoption, where individuals and businesses can choose technologies and service providers that best meet their needs. The trial's top-down approach is inconsistent with this principle and with broader policy efforts to empower consumers.

4. Alternative Pathways Exist

The trial's objectives—such as increased CER uptake, improved network utilisation, and emissions reduction—can be achieved through existing regulatory tools and market mechanisms. These include tariff reform, improved data transparency, streamlined connection processes, and targeted government programs.

Evie Networks encourages the AER to focus on removing barriers to CER uptake within DNSPs' existing remit, rather than enabling regulated monopolies to enter competitive spaces. This includes enforcing obligations for DNSPs to share granular network data, modernise tariffs, and improve connection processes—issues we have raised previously with the AER, AEMC, CER Taskforce and Parliamentary Reviews.

Conclusion

Evie Networks urges the AER to reject Ausgrid's Community Power Network Trial Waiver Application. The proposal is not aligned with the long-term interests of consumers, risks distorting competitive markets, and undermines the integrity of the regulatory framework. We support analysis and recommendations made by Nexa Advisory and the Tech Council of Australia who are experts in this field. We encourage the AER to uphold the principles of competition, transparency, and consumer choice in its assessment.

Thank you for considering our submission. We welcome further engagement on this matter.



Evie Networks