

19 August 2022

Energy Security Board
Level 15, 6 Castlereagh St
Sydney NSW 2000

Submitted via email to: info@esb.org.au

Dear ESB Team,

ESB Electric Vehicle Smart Charging – Issue Paper

PLUS ES welcomes the opportunity to provide feedback to the ESB's Issue Paper – Electric Vehicle (EV) Smart Charging. PLUS ES is a registered Metering Co-ordinator (MC) and an accredited Metering Provider (MP) and Metering Data Provider (MDP) in the National Electricity Market (NEM). Our skilled workforce provides metering services across Australia. Our customers range from small residential customers through to Australia's largest manufacturers and mining operators.

PLUS ES is currently supporting the EV sector by providing infrastructure services such as charging stations and NEM standard metrology.

We are supportive of the development and implementation of an EV Smart Charging Policy and Framework, underpinned by affordability and sustainability. We provide our feedback below for your consideration:

- The Australian EV market is in its infancy compared to other markets such as the UK, France, and the US. There is an opportunity to leverage the learnings from these markets to develop a consistent EV Smart Charging Policy and Framework to deliver harmonisation across jurisdictions. Harmonisation across the NEM would support the objective of delivering an efficient least cost option.

The EV Smart Charging Policy and Framework should allow for growth and network protections whilst providing the flexibility to promote new business models and enable customer trust. Implementing onerous mandates as a mechanism to futureproof the EV sector has the potential to create an additional cost burden on consumers and be a deterrent to achieving the desired uptake and installation of EV smart chargers. Policy outcomes should be cost reflective.

- Further consideration should be given to domestic versus public EV smart charging and the impacts to the end consumer. Where applicable the framework should differentiate between the two categories to realise a more equitable outcome. For example, a domestic use consumer may have no need for fast charging their EV or the need to incur the additional costs to upgrade their electrical infrastructure. A commercial entity such as a fast food restaurant or supermarket may require fast charging capabilities. Allowances should be made for these differences, at a minimum until the EV market has sufficiently matured. The alternative may result in a less desirable outcome where customers forgo smart chargers and use their wall socket plugs for EV charging, inadvertently creating peaks and troughs, accentuating secondary peak demand on the network.
- Minimum standards for EV smart chargers and associated devices are required to ensure standardised quality and capability such as:
 - Enabling remote control – to manage inadvertent peak demand on network resources; and
 - NEM Metrology – supporting NEM metrology devices where the data collected is to be utilised for billing and/or market settlements. For example, providing billing/settlement data from a consumption meter or providing data for the same use case from a measurement device of the smart charger – the standards should be aligned.
- Customers and industry need to be incentivised for an acceptable uptake of EV smart charging. Incentives offered need to be equitable and provide the customer a choice to suit their requirements. That is, customer behaviour should not be inhibited by the framework. Some customers want to control their EV charging and others are comfortable in having someone else manage their EV charging. Tariff driven incentives should be customised to each network's requirement. This would deliver randomisation and core optimisation by staggering the charging times and avoiding secondary peak times. The challenge is for a balanced and equitable price point to be available to encourage uptake and build customer trust.

Smart metering, especially in the infancy of smart charging, could provide the mechanism to appropriately control EV charging, as per the assigned tariff, similar to controlled load for hot water services, whilst also providing the industry NEM standard data.

- As the saturation of EV smart chargers increases, the Contact Point Operator (CPO), would drive efficiencies. The introduction of a separate role would incur additional costs to the industry. For a least cost option, the Retailer could be the most optimal participant to manage this activity by consolidating it with other Distributed Energy Resources (DER)



management activities they perform on behalf of their customer.

- PLUS ES supports data sharing with the opportunity for data collectors to earn a return for the provisioning of data services. We support a conceptual alignment to the Australian Energy Market Commission (AEMC) Metering Framework Review determination with respect to meter data, especially where the data required is to be used for billing and/or settlements purposes.

PLUS ES would welcome further discussions in relation to this submission. If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at Helen.vassos@pluses.com.au.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Clark", is positioned below the "Sincerely," text.

Jason Clark
Executive General Manager