

19 August 2022



Anna Collyer
Chair
Energy Security Board
Submitted via email: info@esb.org.au

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Dear Ms Collyer,

Ausgrid Response to Electric Vehicle Smart Charging - Issues Paper

Ausgrid is pleased to provide this response on the Energy Security Board's (**ESB**) Electric Vehicle Smart Charging - Issues Paper. We note that we have also provided input into and support the response from Energy Networks Australia.

Ausgrid operates a shared electricity network that powers the homes and businesses of more than 4 million Australians living and working in an area that covers over 22,000 kilometres from the Sydney CBD to the Upper Hunter. As a Distribution System Operator (DSO) we have an important role in providing safe, reliable, and efficient network services.

Ausgrid supports the ESB's work on this issue as the integration of electric vehicles (EV) into the future grid is of critical importance. The correct policy and standards settings will help to ensure EVs are control ready and customers are rewarded for their behaviour, as opposed to becoming a problem to ameliorate. Ausgrid is committed to enabling our customers' EV adoption ambitions.

In this context we raise the following for consideration by the ESB:

Standardisation

The focus should be on ensuring there are minimum standards for EVs, smart charging equipment and their orchestration, that is as far as possible both nationally and internationally consistent, as this will generally ensure the most cost-efficient approach to their implementation. Review and where appropriate, alignment of any proposed minimum standards should also take into account proposed EV updates to the National Construction Code and jurisdiction specific service installation rules. For orchestration, such standards should be open, like OCPP 1.6J.

This will ensure that customers can then have the choice to 'opt in' to programs without needing to change their equipment.

In terms of existing market mechanisms for delivery of services from EV's, these should be as much as possible aligned with the existing mechanisms for Customer Energy Resources (**CER**) more broadly, to reduce complexity and cost. New roles should not be lightly introduced for this reason. At this stage the need for a new market role, like a charge point operator, does not seem justified.

In developing these minimum standards, consideration in the context of home charging should also be given to different types of housing stock, particularly multiple occupancy and semi-detached or terraced housing where there is limited off-street parking, or strata managed off-street parking, including the issue of how best to facilitate the cost-efficient retrofitting of the existing housing stock, to ensure the right solutions are delivered for all housing types and customers. In this regard lessons may be able to be taken from international examples like France, which has a large stock of multiple occupancy housing, especially in

Connecting communities,
empowering lives

Paris¹.

Tariffs

Networks should continue to be able to design and implement cost reflective tariffs for all users of the network, with customers continuing to have the option of choosing which tariff best suits their needs. If the rollout of public charging needs support, it would be best addressed through Government support and not through distorting the ongoing effort to make network tariffs cost reflective.

While we do not think technology specific tariffs are necessary, we do think tariffs can be designed to take account of CER to better incentivise and reward customer behaviour that reduces costs for all network users. We are continuing to evolve and test our tariffs through sub threshold tariff trials.

Tariffs can also be used by networks to reward CER, including EVs, for network support as we are demonstrating through our sub threshold tariff trails and Project Edith trial. Direct procurement should remain an option for networks and not be mandated as the primary way of rewarding customers.

EV visibility and efficient network operation

Having visibility of CER, including EVs is critical for Ausgrid and other networks to operate the future grid. This information will help us to plan, build, and operate our networks in a way that enables our customers' choices and allows them to connect smoothly and efficiently.

While we note this is not a major theme of the issues paper and that it is likely to be dealt with as part of the ESB Data Strategy workstream and the Australian Energy Market Commission's metering review (in terms of accelerating the roll out of smart meters), we wanted to draw the ESB's attention to the importance of dealing with this issue.

We thank the ESB for the opportunity to provide this response and look forward to continued collaboration with the ESB on this issue. Should you wish to discuss any of the issues raised in this response further, please contact Nathan Laird, Planning Policies and Procedure Manager at nathan.laird@ausgrid.com.au.

Regards,



Junayd Hollis
EGM Asset Management

¹ See, for example. <https://blog.evbox.com/ev-charging-infrastructure-incentives-eu#France>; https://theicct.org/sites/default/files/publications/EV-charging-best-practices_ICCT-white-paper_04102017_vF.pdf; <file:///C:/Users/T64206/Downloads/report-on-the-integration-of-electric-mobility.pdf>; https://theicct.org/wp-content/uploads/2021/12/france-evs-infrastructure-transition-nov21_0.pdf; <https://www.wfw.com/articles/the-future-of-e-charging-infrastructure-france/>; <https://batinfo.com/en/actualite/la-caisse-des-depots-lance-a-subsi-daire-dediee-aux-stations-de-charge-privatives-20032>; and <https://newsrnd.com/news/2022-06-11-electric-vehicles--enedis-invites-itself-into-condominiums.BJsPBVMY5.html>