

10 February 2023

Anna Collyer
Chair
Energy Security Board

By email: info@esb.org.au

Dear Anna

Electric Vehicle Supply Equipment Standing Data– Submission to the consultation paper

AusNet welcomes the opportunity to provide this submission to the Energy Security Board's (**ESB**) consultation paper on Electric Vehicle Supply Equipment (**EVSE**) Standing Data.

As highlighted in the consultation paper, EV charging is set to transform the electricity system as the uptake of vehicles grows. It will be crucial for distributors, the Australian Energy Market Operator (**AEMO**) and other relevant parties to have visibility and understanding of the location, size, charging behaviour and similar characteristics of EVs, to appropriately plan and manage an orderly integration of EVs into the electricity system. It is also necessary for the implementation of network tariff reform which, under Victorian legislation, currently includes specific tariff arrangements for customers with EVs. We therefore support the development of a suitable data framework for EVs as a matter of priority.

We support the ESB's proposal to:

- create a national EVSE database that lists all EVSEs available for installation in Australia and their physical characteristics
- extend the existing Distributed Energy Resources (**DER**) Register to include EVSE-related data specific to each installation.

Below we provide recommendations to the ESB on an effective implementation of this proposed framework.

The national EVSE database should be comprehensive

The national EVSE database should include all information on the EVSE make and model and physical capabilities that may be of relevance to networks, AEMO or other parties. Additional to the data fields proposed in the consultation paper (table 3), at a minimum we propose inclusion of the following characteristics of each EVSE make and model:

- minimum and maximum voltage and power factor
- number of charging ports
- charging mode or level
- charge rate per minute / maximum charge rate
- wireless charging capabilities
- vehicle to grid or vehicle to home capabilities.

These characteristics are important for network planning and understanding the impact of different EVSEs on electricity consumption and export. Including the fields in the national EVSE database limits data population at the time of installation and limits human error during data population. We anticipate the benefit of a comprehensive database on EVSEs would far outweigh the cost.

We support the management of the national EVSE databased by an industry body, like the Clean Energy Council. The nominated industry body should engage with network and the rest of the industry on the comprehensive list of data that could be included, prior to the development of the database.

Changes to jurisdictional arrangements are required to improve compliance with the DER Register

We support an extension to the DER Register to include EVSE data. However, we do not consider option 1 in the consultation paper—i.e., amending the National Electricity Rules (**NER**) to specify the AEMO DER Information Guidelines include EVSE data—is sufficient for extending the register.

The data collected through the DER Register is an input into network management and planning, including our policies on DER export limits. This is in addition to how the data is used by AEMO for wholesale market and system planning. Provision of register data and ensuring data quality are crucial to prudent decision making in the electricity system. Inaccurate or missing data can lead to inaccurate assumptions around connected DER, which will ultimately result in inefficient policies and decisions that are not in the long-term interest of consumers.

Under the existing DER Register framework in Victoria:

- Customers are required to seek a connection agreement for DER (which includes bidirectional EVSEs). This is typically done by the DER installer. Failure to do so can result in the inability to collect subsidies or the customer's meter failing to record energy exported to the grid.
- Distributors' connection agreement requires the customer to provide data that is used for the DER Register. This is also typically provided by the DER installer on behalf of the customer.
- Distributors are required to share the collected data with AEMO through the DER Register.

Distributors are required to be compliant with their obligation to provide DER data to AEMO and can be penalised for non-compliance; however, the incentives on customers and their installers to be compliant with their obligation to provide accurate data to distributors are weak, as the only enforcement measure for non-compliance would be disconnection of the customer's DER, which is considered to be disproportionate.

Therefore, in considering expanding the DER Register to include EVSEs, the ESB should firstly consider necessary changes to existing jurisdictional frameworks to improve compliance and data quality. For Victoria, we propose:

- The Electricity Distribution Code of Practice (**EDCOP**) be updated to extend the requirements for embedded generation to EVSEs, and to strengthen requirements related to data sharing.
- Introduction of a customer protections framework, or a mandatory insurance scheme, that transfers the responsibility for compliance with the distributor's connection agreement from the customer to the DER and EVSE installer / retailer. This may require changes to commercial arrangements between the customer and the EVSE retailer/installer to formally recognise the responsibility and liability of compliance. An alternative is a warranty arrangement, where the warranty is specific to compliance with obligations under the distributor's connection requirements.

An alternative would be financial incentives for customers or installers to ensure compliance with the DER Register, for example, inability to collect subsidies if data is not provided. We support either approach to improving compliance—however, given the importance of data quality for future network and system planning, and the likely number of EV installations over the coming decades, a stronger customer protections framework may be more appropriate and effective for reaching compliance.

We also consider these jurisdictional arrangements are more effective compared to introducing new national arrangements for compliance, i.e., introducing a new national regulator (option 3 in the consultation paper) and adding rule obligations on EV and DER installers. Setting up a new national regulator would be costly and national regulations may conflict with already established jurisdictional arrangements for electrical installations.

Further consideration should be given to how data can be shared for all EVs

We support the comprehensive list of EVSE types proposed to be included in the DER Register. It is important that commercial EVSEs are captured (as proposed), as we anticipate the majority of EVSEs installed on our network are likely to be for commercial use.

However, not including vehicles without EVSEs in the DER Register creates a gap in visibility of EVs, particularly in the residential sector where, unless EVSEs are mandated, customers are likely to rely on in-built car chargers.

We encourage the ESB to consider how data on EV purchases or registrations can be securely shared with networks, AEMO and other relevant parties to allow for full visibility of EVs. For example, there may be secure jurisdictional arrangements for sharing of de-identified EV registration data, or there could be arrangements for data sharing as part of conditions for EV subsidies.

Please do not hesitate to contact me on sonja.lekovic@ausnetservices.com.au about the submission.

Sincerely,



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