



Department of Energy, Environment and Climate Action

Ms Anna Collyer
Chair
Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2001

Ref: MBR049100/
SBR013227

By electronic lodgement: info@esb.org.au

Dear Ms Collyer

CONSULTATION PAPER - ELECTRIC VEHICLE SUPPLY EQUIPMENT (EVSE) STANDING DATA

The Victorian Government appreciates the opportunity to provide feedback on the Energy Security Board's (ESB) EVSE standing data consultation paper.

In May 2021, the Victorian Government released its Zero Emissions Vehicle (ZEV) Roadmap (the Roadmap). The Roadmap puts forward a suite of policies and programs to remove barriers to ZEV uptake and leverage opportunities associated with the impacts of this critical transition. With transport emissions the second largest contributor to greenhouse (GHG) emissions in Victoria (private vehicles being the largest contributor), leadership and decisive action is needed now more than ever. This is why the Victorian Government committed \$100 million in 2021 towards the decarbonisation of the transport sector, including \$46 million for Australia's first public ZEV subsidy program, and committed to a target of half of all new light vehicle sales to be ZEVs by 2030.

Since the Roadmap's launch, new sales have increased by 235 percent and Victoria recorded its highest ever monthly uptake in December 2022 (8.6 percent of total new sales). Victoria is also currently the second largest buyer of ZEVs (28 per cent of national ZEV sales), just behind New South Wales (32 per cent). I am confident this will only continue to accelerate. The Australian Energy Market Operator (AEMO) predicts there could be almost one million EVs (including plug-in hybrids) in Victoria by 2030 (step change scenario). This level of uptake could result in over 2500-gigawatt hours (GWh) of energy demand in Victoria by 2030, a potential 32-fold increase from the 78 GWh anticipated in 2023.

To manage this transformational shift, visibility of EV charging will be critical. This is why the Victorian Government welcomes the proposal to collect EVSE standing data via the national Distributed Energy Resources (DER) Register. Capturing data will help ensure the planning of EV and grid infrastructure is appropriately managed and coordinated for the benefit of all energy consumers. Distribution Network Service Providers (DNSPs), AEMO and policy makers need visibility of EVSE data to understand, forecast and better manage the impacts of EV charging on local networks. Importantly, improved visibility will make it easier for DNSPs to better understand peak demand load profiles, increase network utilisation, improve network data quality, minimise network impacts and the risks of outages – and ultimately to help reduce costs for all electricity consumers. Victoria has a high level of smart meter penetration and this information combined with EVSE standing data, with appropriate privacy protections, will enable Victoria to lead the way in effective EV integration.

The expected accelerated growth of EVs also reinforces the importance of ensuring that Victoria has effective price signals in place to avoid locking in higher infrastructure costs for energy consumers. As

EV uptake increases and our energy system transitions to more decentralised renewable energy generation, flat tariffs are no longer the most effective or fairest means of recovering the costs of providing electricity. This is why the Victorian Government requires all small customers with an EVSE to be assigned to cost reflective tariffs (such as time of use or demand charging). This requirement means all residential and small business EV users with EVSE, once identified, will no longer have access to flat rate tariffs. ESB's proposal for capturing EVSE data will be a critical enabler of these reforms, helping DNSPs identify EV owners and put them on cost reflective tariffs. Importantly, this should incentivise EV owners to charge at off-peak times and help avoid uncontrolled convenience charging as far as practicable. This will not only lead to cost savings for EV owners but also reduced network costs for all energy consumers.

The Victorian Government supports the general tests and considerations put forward for data collection, particularly ESB's approach for data minimisation to reduce the burden on installers and ensure private or commercially sensitive information is protected. The Victorian Government encourages the ESB to continue to work with industry and refine the EVSE standing data specifications to ensure the right balance is struck between the objectives of the reform, the potential burden and costs of data collection and maintenance, consumer needs, and privacy.

The Victorian Government would also encourage the ESB to consider requiring EVSE serial numbers as part of the standing data specifications, primarily to help any future safety recalls. While safety is not the intent of the ESB proposal, collecting serial numbers and having that data accessible to relevant government agencies may help manage and coordinate any safety risks associated with faulty equipment. Additionally, the collection of serial numbers at the same time installers capture other data is more efficient than doing any reactive site visits for needed data.

Thank you for the opportunity to provide input into the EVSE consultation paper. If you would like to discuss any of the issues raised in this submission further, please contact Katie Brown, Acting Executive Director, Energy Strategy at (03) 8508 1376 or katie.brown@delwp.vic.gov.au.

Yours sincerely,



Elizabeth Molyneux
Deputy Secretary, Energy
Department of Energy, Environment and Climate Action

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