



Part of Energy Queensland

10 February 2023

Ms Anna Collyer
Chair
Energy Security Board
John Gorton Building
King Edward Terrace
PARKES ACT 2600

Submitted via email to info@esb.org.au

Dear Ms Collyer

Energy Security Board – Electric Vehicle Supply Equipment Standing Data

Ergon Energy Corporation Limited (Ergon Energy) and Energex Limited (Energex) welcome the opportunity to provide comment to the Energy Security Board (ESB) in response to its consultation paper on Electric Vehicle Supply Equipment Standing Data (the Consultation). Ergon Energy and Energex are distribution network service providers (DNSPs) operating in Queensland.

Feedback and comments to the questions are included in the attached response template.

Should the ESB require additional information or wish to discuss any aspect of this response, please contact me on 0429 394 855 or Tammara Scott on 0492137 878.

Yours sincerely,

Alena Christmas
Acting Manager Regulation

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Encl: Ergon Energy and Energex's comments on the consultation questions

Consultation Question	Ergon Energy's and Energex's Response
Question 1: Are the key use cases for EVSE standing data adequately captured and described?	Ergon Energy and Energex agree that the key use cases are adequately captured and described in the Consultation Paper.
Question 2: Are the listed considerations for data collection appropriate?	Ergon Energy and Energex agree that the listed considerations for data collection are appropriate.
Question 3: What data fields should or should not be collected, and why? What is the minimum set of data required to facilitate the above use cases?	Ergon Energy and Energex assume that the delineation between uni-directional and bi-directional capability will be defined by the selection of the 'EVSE type/make/model'. However, we note that this will depend on the clear delineation in the 'EVSE Database lookup', which we assume will be managed by the Clean Energy Council and is a similar approach to what is required for Photovoltaic and Battery Energy Storage Systems inverters.
Question 4: How can timely and accurate reporting of EVSE installation data best be supported?	Ergon Energy and Energex consider it critical that EVSE installation and associated details as outlined in Table 3 of the Consultation Paper are provided to the DNSP by electrical contractors. This is similar to the Distributed Energy Resources Register (DER) requirements.
Question 5: What else could a National EVSE Database be used for, in addition to supporting EVSE standing data collection processes?	Ergon Energy and Energex provide no comment.
Question 6: What governance arrangements are needed to ensure the appropriate operation of a National EVSE Database?	<p>Ergon Energy and Energex consider that the requirement for a national EVSE Database could lead to compliance issues with registering and maintaining data input. Making the database a mandatory requirement would result in either DNSPs or State Government having to monitor the database to ensure installers are complying. This may lead to DNSPs having to provide a strong incentive (such as financial incentives or penalties) to ensure installers are complying with the requirements of the National EVSE Database.</p> <p>Ergon and Energex suggest the ESB undertake further work to ensure there are appropriate measures, either through incentives or enforcement, in place to guarantee compliance with data entry requirements. It is critical to get this balance the right.</p>
Question 7: Are there any other reporting triggers that have not been considered?	Ergon Energy and Energex support reporting Trigger 6 'Upon installation of any EVSE by an electrician' as outlined in Table 6 of the Consultation Paper and have no additional suggestion for other reporting triggers.

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Question 8: What other advantages and disadvantages should be considered when comparing available reporting triggers?	Ergon Energy and Energex provide no comment.
Question 9: Is it agreed that networks could impose a requirement for EVSE standing data reporting, through an amendment to the service and installation rules?	<p>Ergon Energy and Energex agree that DNSPs could update their service and installation rules (for example, the Queensland Electricity Connection and Metering Manual) to include EVSE standing data reporting without requiring a regulation change. However, there are concerns with the ability of the service and installation rules to effectively enforce compliance with EVSE reporting requirements on an electrical contractor and may not be the most effective mechanism.</p> <p>Ergon Energy and Energex advise that further work is required to ensure there are appropriate measures in place such that EVSE standing data is entered in the register compliantly.</p>
Question 10: Is it accepted that an expanded DER Register should be the database system for collection and sharing of EVSE standing data?	<p>Ergon Energy and Energex agree that the DER register should be expanded and be used as the database for EVSE standing data as both EVSE and DER devices have a similar impact on the network. However, it should be noted that the EVSE devices are different generating systems and do not have the same characteristics as DER devices. Therefore, combining EVSE devices into the DER register will require the inclusion of new standing data fields. This has the potential to increase complexity and add challenges with data accuracy for the database, and any changes need to be cost efficient and fit for purpose.</p> <p>As raised in our response to Question 6, careful consideration needs to be given on how to ensure electrical contractors comply with an obligation to enter the required data at the time of installation. Ergon Energy and Energex also note that the database should have the capability to incorporate and update old data if it was not entered correctly at the time of installation.</p>
Question 11: What preferences or issues do stakeholders have regarding the described regulatory options? If a rule change is needed to achieve EVSE standing data collection, do you consider the rule change would be	Ergon Energy and Energex prefer extending the DER Register information requirements to EVSE standing data collection and management. However, any requirement for DNSPs to manage compliance in the absence of compelling electrical contractor motivation is the biggest challenge to overall success. In addition, it's important to highlight that the customer is bound by the relevant obligations associated with the connection contract, not the

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likely to have a significant effect on the national electricity market?	electrician contractor. This adds to the concerns associated with enforcement on an electrical contractor.
Question 12: Is the proposed regulatory assessment framework fit for purpose?	Ergon Energy and Energex agree that the proposed regulatory assessment framework is fit for purpose.