



Endeavour
Energy



10 February 2023

Energy Security Board

Submitted via email: info@esb.org.au

Dear Energy Security Board,

**NSW DNSP joint Response to Electric Vehicle Supply Equipment (EVSE) Standing Data
Consultation Paper (Consultation Paper)**

Ausgrid, Endeavour Energy and Essential Energy (NSW distribution network service providers (**DNSPs**)) thank the Energy Security Board (**ESB**) for the opportunity to provide a submission on Consultation Paper. We strongly support the goal of decarbonising Australia's transport sector to meet the needs of all Australians as a critical step in Australia achieving net zero by 2050 and we are ready to support our customers in doing this. Transitioning to electric vehicles (**EVs**) will save Australian households money, will create new jobs and new industries, and will mean Australian will no longer be dependent on foreign oil.

Networks like ours are on a path to becoming more active distribution system operators (**DSOs**), efficiently integrating not only EVs but also solar, batteries and other forms of consumer energy resources (**CER**). Visibility of EVs is critical for network operators to plan, build, and operate our networks in a way that enables customer choices and the transition to EVs smoothly and efficiently. As a result we strongly support the ESB's work in this space and are pleased to provide this response on the Consultation Paper.

We were active participants in the Australian Energy Market Commission's (**AEMC**) and Australian Energy Market Operator's (**AEMO**) consultation processes supporting the establishment of the Distributed Energy Resources (**DER**) Register. In this context we raise the following for the ESB's consideration:

- Visibility of EVSE Standing Data is limited today, but critical to the efficient integration of EVs to the network;
- EVSE installation-specific data is of most importance to satisfy network use cases;
- The preferred approach must consider compliance and data quality as a priority to ensure effective and efficiently implemented reform; and
- Proposals to extend the DER Register should be considered via an assessment of the current performance of the DER Register against its objectives.

Attachment A below provides more detail on these points. We welcome the opportunity to discuss any aspect of this submission with you. Please contact for:

- Ausgrid: Nathan Laird at nathan.laird@ausgrid.com.au;
- Endeavour Energy: Danny Thai at danny.thai@endeavourenergy.com.au; and
- Essential Energy: Adam Young at adam.young@essentialenergy.com.au.

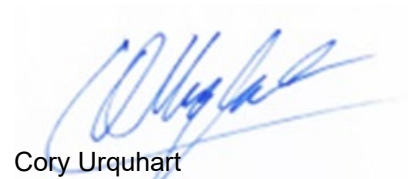
Yours sincerely,



Matthew Webb
Head of Asset Investment
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Colin Crisafulli
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Cory Urquhart
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Attachment A: Detailed response

1. EVSE standing data and use cases

1.1 *Visibility of EVSE Standing Data is limited today, but critical to the efficient integration of EVs to the network*

DNSPs are a key enabler for electrifying the transport sector. Demand for EVs increased by 65% between 2021 and 2022.¹ This momentum will continue to increase at scale over the coming years. this means readying our networks for over 2 million EVs by 2039.

This consultation relates to collecting information known as EVSE Standing Data for EVSE installations (EV charger installations). We agree with the articulation of EV charging impacts and the importance of EVSE Standing Data use cases identified in the Consultation Paper.

Access to EVSE Standing Data for networks will provide network operators with the information needed to prepare for and support a smooth transition to EVs in a fast-changing environment by enabling EV's to be both integrated and orchestrated. If we do not have access to this data this will impact not only our customers' choices but the transition to our net zero future.

This is because a network's visibility of EVSEs provides networks with critical information required to understand uptake of EVs for network planning, forecasting and managing network capacity. This allows us to ensure we, for example, meet customers' demand and deliver reliability at least cost to our customers. It also supports innovation on network tariff and incentive design to improve EV charging efficiency.

2. EVSE Standing Data specification

2.1 *EVSE installation specific data is of most importance to satisfy network use cases*

The quality and integrity of EVSE installation specific data that is or can be made available to DNSPs is critical to our ability to efficiently and effectively integrate EVs and facilitate our customer's choices. We recommend proposing a minimum set of data requirements for EVSE Standing Data required to satisfy the network use cases, with consideration to the cost of data capture, solution complexity, stakeholder impacts and data accuracy. At a minimum these minimum requirements should include:

- National Meter Identifier (**NMI**) number (EVSE location);
- Number of phases supplying the EVSE (1 or 3);
- Maximum Demand (size of current limiting device upstream of EVSE) (Amps);
- Maximum Export Capacity (for Vehicle to Grid (**V2G**)) (Inverter Power Capacity); and
- Remote energy management enabled (Yes/No).

Timely and accurate EVSE Standing Data reporting is critical. It should leverage existing processes where possible at the point of installation. It is important to identify where EVSE installations have bi-directional capability enabled. This is possible under the existing DER Register process.

A national EVSE Standing Data database should consider the costs and benefits and ensure it is supported by a framework that ensures compliance and the capture of high-quality data. This database could be an extension to the DER Register (or similar) subject to the issues with the current DER Register being addressed.

Current NSW contestability arrangements are impacting data integrity and compliance under the existing DER register arrangements for consumer energy resources (other than EVs), which undermines its effectiveness and usefulness.

¹ Electric Vehicle Council, [State of Electric Vehicles](#) (October 2022).

3. Determining EVSE charger installations that should be captured

3.1 *The preferred approach must consider process compliance and data quality as a priority to effective reform*

To the extent possible, creating new parallel reporting requirements should be avoided. Currently accredited electricians and installers must complete a Certificate Compliance Electrical Work (**CCEW**) and a Notice of Service Works (**NoSW**) (where applicable), and follow the DER Register Information Guidelines for all CER installations.

Our view is that all fixed wired EVSE installations (e.g., Level 2 or Level 3) should be captured at the point of install, potentially using the CCEW or NoSW process to minimise any duplication of existing processes.

We recognise not all customers will want to install a Level 2 or Level 3 EV charger. While out of this Consultation Paper's scope, we strongly support the industry exploring network access to other data sets which may give networks greater visibility over Level 1 chargers, for example smart metering data. We note the ESB's data strategy and the AEMC's Review of the Regulatory Framework for Metering Services touches on this issue. We recommend the ESB ensure co-ordination occurs between market bodies to enable the necessary network visibility to be cascaded through any new requirements.

4. Achieving a nationally consistent approach to EVSE data collection

4.1 *Proposals to extend the DER register should be considered in line with current performance of the DER Register to meet its objectives*

We were an active participant in the process to establish the DER Register and all stakeholders, including AEMO, have undertaken a significant amount of work to continue improve the DER Register.

Despite this work to date, there are still challenges with providing accurate 'as installed' information in the DER Register. This includes issues in relation to data quality and completeness, and difficulties with installers consistently providing data after the point of installation.

If the preferred solution is to extend the DER Register to collect EVSE Standing Data, then existing operational and regulatory challenges should also be addressed as this will influence which regulatory framework is appropriate to enact the provision of EVSE Standing Data in the DER Register at the point of installation. We note there is potential for a review and update of the DER Register and we recommend actioning this review and implementing its findings before expanding the DER Register to EVSE Standing Data.