10 February 2023

Energy Security Board

Lodged by email: info@esb.org.au

Dear Sir/Madam,

Response to Electric Vehicle Supply Equipment Standing Data consultation paper

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the Electric Vehicle Supply Equipment (EVSE) Standing Data consultation paper.

Origin is a large Australian integrated energy company with activities in energy retailing, power generation, natural gas production and LNG export. Origin also has recent experience in exploring new product offerings and has focused on areas such as solar & storage, connected homes, electric vehicles (EVs) and future fuels including hydrogen.

Origin has developed our own proprietary virtual power plant (VPP) platform to enable the coordination of behind the meter distributed energy resources (DER)[1]. Assets connected to the VPP have grown from 98 MW to 258 MW over the past 18 months, including an increasing variety of distributed energy and Internet of Things (IoT) devices. These devices include hot water systems, solar, batteries, air conditioners, EVs and various industrial assets, which are aggregated, controlled and dispatched in response to market and portfolio positions, creating value for both Origin and customers through a lower cost of energy. Origin views the integration of these devices as a key long-term reform.

Generally, we understand the motivation to capturing more accurate information about the size and location of EVSE. This could be beneficial in planning the grid of the future and coordinating the efficient orchestration of behind the meter resources, such as EVs. Origin considers that a key priority requiring government support is incentivising smart charging infrastructure for EVs. Smart chargers will allow for greater visibility and control of this growing load, ensuring that EVs do not become a burden on the system.

However, we are not convinced that the proposal in the consultation paper is necessarily the best way to capture more accurate data about EV chargers. We suggest that a broader range of options be considered with a preference for a process which is more automated. A rigorous cost benefit analysis should then be carried out to compare the highest priority use cases against the best options for implementing the new requirements.

[1] We note the Energy Security Boards' (ESB) new terminology of Customer Energy Resources (CER).

Origin Energy Limited ABN 30 000 051 696 • Level 32, Tower 1, 100 Barangaroo Avenue, Barangaroo NSW 2000
GPO Box 5376, Barangaroo NSW 2000 • Telephone (02) 8345 5000 • Facsimile (02) 9252 9244 • www.originenergy.com.au

Our comments on significant issues raised in the consultation paper include:

- **Use cases** – the numerous use cases presented in the consultation paper are quite broad. It is important that more data is not collected just for the sake of having it – most data collection and storage will come at a cost. We suggest that these use cases be further scrutinised and reduced to the core requirements. The most important uses appear to be for the purposes of long-term network and market planning.

- **DER Register** – the existing DER Register is a logical option to record EVSE standing data. Being a national register is also helpful. However, our understanding is that the DER register has suffered from incomplete reporting of data and may not be as up-to-date as suggested in the consultation paper. This is partly a result of the nature of the interface with the register, which largely relies on installers inputting the required data. Further, the required information differs by distribution network – it would be useful if this was streamlined to become a more national system. We suggest that how the EVSE data is recorded on the DER Register is the key issue.

- **Alternatives** – we suggest that the ESB consider other options besides the reliance on electricians to enter data into a register. This could be automated and more closely tied to incentives at the point of sale. For example, the vehicle registration process may be a simple existing process that could be leveraged to help source the required data.

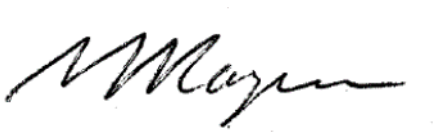
- **Incentives** – we suggest that some form of incentive may be required to ensure timely and accurate reporting of EVSE data. This may be most simply implemented at the point of sale.

- **Cost-benefit analysis** – a thorough analysis of the proposed benefits from the core use cases should be analysed against a range of alternative implementation options.

- **Draft specification** – the proposed data specification is reasonable, noting the concerns (above) about how this implementation would be captured in the most efficient manner.

If you wish to discuss any aspect of this submission further, please contact Matthew Kaspura at matthew.kaspura@originenergy.com.au.

Yours sincerely



Matthew Kaspura
Manager Green and Future Energy Policy
Origin Energy Limited
+61 2 9503 5178 Matthew.Kaspura@originenergy.com.au