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Energy Security Board  
PO Box A2449  
Sydney South NSW 1235

Submitted electronically: [info@esb.org.au](mailto:info@esb.org.au)

## **Re: Electric Vehicle Supply Equipment Standing Data Consultation Paper**

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to make this submission to the Energy Security Board on the rationale and options for capturing 'standing data' for new Electric Vehicle Supply Equipment (EVSE) installations.

We acknowledge the challenges arising from increased EV penetration, the need for orderly integration with the distribution network and the expected charging profile of EV owners. The Distribution Network Services Providers (DNSPs) will require visibility of the installation and use of chargers and other Electric Vehicle Supply Equipment. This will allow them to monitor two way energy flows, identify constraints and inform their expenditure and tariff proposals.

However, Red and Lumo disagree that a national EVSE register is required to assess the real-time and forecast impacts of Electric Vehicle (EV) charging by AEMO and DNSPs. Rather, we support the use of the DER register of bi-directional devices although this should not extend to expanding the DER register to devices that constitute typical loads. It is unclear that the suggested use cases will deliver substantial value to electricity consumers and instead, this would impose a further administrative burden upon consumers, their agents (electricians) and DNSPs when there are already systems and processes in place to detect and predict the data profiles consistent with EV charging<sup>1</sup> through intelligent and effective use of smart meter data.

Consumer use of similar loads, such as air conditioning, does not rely upon a device register; their real-time and forecast impacts are assessed through meter data and their use is incentivised through tariffs and this same methodology should be applied to EV load. The risk under an EVSE register is that DNSPs will apply specific tariffs to EVs, rather than accounting for broader network characteristics and usage profiles across all appliances and equipment. This could distort decisions about when and where to charge an EV.

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<sup>1</sup> [CitiPower, Powercor and United Energy response to Electric Vehicle Smart Charging – Issues Paper](#)

We also note that the registration of an EV at an address does not mean there is an EV present. Consumers will purchase EVSE not just for their principal place of residence but also for holiday homes and business addresses.

We acknowledge that AEMO and the DNSPs may find value in collating EVSE type/make/model specifications and cross-referencing this with registration data to assist in developing load profiles. Therefore, we would encourage AEMO and network businesses to obtain this from Austroad's 'National Exchange of Vehicle and Driver Information System'<sup>2</sup> (NEVDIS) or the Australian Bureau of Statistics (ABS) data on EV registration and change in motor vehicle registration<sup>3</sup>.

The mandatory collection of site-specific communication and metering functions that allow for remote coordination should only be contemplated for bi-directional models as already considered by the DER register. Any other form of remote coordination should consist of voluntary consumer participation because consumers who are compelled to participate in load shedding or demand response may easily avoid this by using a plug-in socket rather than a level 2 charger, reintroducing the demand and reducing the effectiveness of any remote coordination (or compulsory EVSE standing data register).

Red and Lumo welcome the work of the ESB program 'Integration of consumer energy resources (CER) and flexible demand' and encourage the ESB to consider that consumers and the market are better served by;

- Fully utilising the existing DER register to capture bi-directional EVSE
- Promoting consumer take-up of smart meters
- Intelligent and effective use of smart meter data

## **About Red and Lumo**

We are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail gas and electricity in Victoria, New South Wales, Queensland, South Australia and in the ACT to over 1.2 million customers.

We thank the ESB for the opportunity to comment on its issues paper. Please contact Sean Jennings, Regulatory Manager on 0403 846 585 if you have any further queries or want to discuss this submission in more detail.

Yours sincerely,

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<sup>2</sup> <https://austroads.com.au/drivers-and-vehicles/nevdis>

<sup>3</sup> [Motor Vehicle Census Australia: 31 January 2021 Australian Bureau of Statistics](#)



A handwritten signature in black ink, appearing to read "G. Hargreaves".

**Geoff Hargreaves**  
Manager Regulatory Affairs  
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