

10 February 2023

Energy Security Board

Submitted to info@esb.org.au

Dear Sir/Madam

RE Electric Vehicle Supply Equipment Standing Data

TasNetworks welcomes the opportunity to make a submission to the Energy Security Board (**ESB**) regarding the Electric Vehicle (**EV**) Supply Equipment Standing Data consultation.

TasNetworks is the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner in Tasmania. The focus of these roles is to deliver safe, secure and reliable electricity network services to Tasmanian and National Electricity Market (**NEM**) customers at sustainable prices. As such, TasNetworks is committed to ensuring customers can maximise the benefit of their investment in Consumer Energy Resources (**CER**) broadly and EVs specifically.

Generally speaking, access to data provides the ability to make better decisions. In this respect, TasNetworks supports the proposal to collect and make available Electric Vehicle Supply Equipment (**EVSE**) Standing Data. TasNetworks supports Energy Networks Australia's (**ENA's**) submission and has the following additional comments to make.

To drive data driven decisions, it is important that the data is accurate and reliable. To this end, it is best to concentrate on collecting a smaller amount of 'core' data rather than trying to collect even more (potentially useful) data at the expense of accuracy. It is likely there will be costs to collecting the data, for example in developing or modifying existing data collection systems. It is important that the ESB identifies the marginal costs of collecting each additional data point and compare it against the marginal benefit gained from the same additional data. This will lead to the ability to identify the core data, which could include such parameters as the current amperage limit, location and how many phases the EVSE uses. It is important not to discount the benefit from collecting additional data, beyond the core data, which could prove useful to undertake future longitudinal studies. The incremental costs of starting to collect additional data later rather than initially (that is, the incremental cost of changing any data collection process) need to be compared to forecast future benefits in assessing what data is deemed 'core'.

One risk that will need to be managed is compliance and enforcement of data provision to ensure it is accurate. If the data proves to be inaccurate then there will be growing reticence to base any planning or operational decisions on it, undermining the entire value proposition.

There are existing processes across the NEM, albeit with jurisdictional differences in acknowledgement of the roles and responsibilities in the jurisdiction, to capture data for the Distributed Energy Resources (**DER**) Register which should be utilised to collect information about EVSEs. Creating new processes will mean more costs which will eventually flow to the customer.

It is clear from the experience with the DER Register, that customers need an incentive to provide accurate information. With the EVSE Standing Data it is unclear what incentives the industry could provide. Other parties like those responsible for vehicle registration and electrical safety may be better placed to provide incentives (whether carrot or stick). For example, in Tasmania the installation of EVSE should trigger an interaction with our electrical safety authority who have the ability to revoke licences from electrical contractors if they do not comply with reporting obligations. Early engagement with electrical contractors in the development of our DER Register data collection process proved critical in ensuring the success of that process.

Another party that may be able to assist with compliance are original equipment manufacturers (**OEMs**). If warranties are linked to the provision of information to regulators or if the ability to download firmware upgrades triggers a reporting obligation this may assist in ensuring data on EVSE is kept up to date. In conclusion, TasNetworks is not best placed to identify or enforce compliance.

As the ESB notes, “knowing the EVSE location will allow network businesses and AEMO to cross-reference EVSE standing data with meter data to develop load profiles associated with different EV installation types.” TasNetworks notes this as a benefit from access to EVSE standing data but also notes the full value of this data does require access to the power quality data from smart meters to identify the impact of EV charging on the network. As identified by the AEMC in its review of the Regulatory Framework for Metering Services, the currently high cost for DNSPs to access smart meter data could outweigh any benefits from combining it with EVSE standing data.

If you would like to contact us with regards to this submission please contact Tim Astley, Network Reform and Regulatory Compliance Team Leader, on tim.astley@tasnetworks.com.au.

Yours faithfully

A rectangular black box used to redact the signature of Chantal Hopwood.

Chantal Hopwood

Head of Regulation