EVC response to the EPWA – Regulating the sale and supply of electricity in embedded networks.

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With reference to:

Have your say on the regulation of embedded networks (www.wa.gov.au)

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Preamble

The Electric Vehicle Council (EVC) is the national body representing the electric vehicle (EV) industry in Australia. As the EV market is emerging in Australia, our work is particularly aimed at increasing certainty for investment through policy, knowledge sharing and education.

Energy Policy WA is a part of the Department of Mines, Industry Regulations and Safety. EPWA provides policy advice to government to facilitate the delivery of secure, reliable, sustainable and affordable energy services to Western Australians.

Our previous submissions on the subject of embedded networks (ENs) can be found here:

EVC response to the Review of the AER exemptions framework for embedded networks - Electric Vehicle Council

Feedback on Victorian Government's Embedded Networks Review: Draft Recommendations Report - Electric Vehicle Council

The EVC is submitting a brief response to the CRIS, reduced to where EVs are concerned.

Introduction

The EVC supports the WA government's continued attention to the fair application of ENs in WA. Equality is an important cornerstone of a harmonious society. Equality in this instance may mean increased regulatory oversight of ENs to apartments, but the same oversight is not needed of ENs to car parks, as an EV driver is free to charge their vehicle wherever they wish. This is explained at length in previous submissions noted above.

Small customers

It is pleasing to see the potential benefits of ENs acknowledged and the proposed policy attempting to work with and improve upon the existing structure. As stated in previous submissions, the EN structure can be especially useful in providing the least cost, least complexity method of introducing EV charging and renewable energy solutions to apartment complexes and the like. This is because the metering requirements are less stringent and therefore take up less space, are cheaper and the cable runs often reduced.

Continuing the ability to use ENs supports the installation of EV chargers for apartment dwellers and therefore enables accelerated EV uptake.

Non-residential customers

The EVC supports the option for non-residential customers in ENs consuming more than 50MWh per year, to obtain a separate master meter at their own cost in order to gain access to competitive retail offers and other protections. In the example of a charge point operator (CPO) wishing to install EV chargers in a shopping complex car park under an EN framework, not having access to competitive retail electricity offers can be detrimental to the business case and may result in the infrastructure not being deployed. This applies the handbrake to the rollout of EV infrastructure and EV uptake more broadly. Therefore, we are

glad to see this barrier will no longer be in place for this customer class. This approach should also be considered for other customer classes that may be impacted by poor access to the contestable market.

Extension of licence exemption for electric vehicle charging stations

The EVC understands that current settings are working. CPOs are able to deploy charging infrastructure and EV drivers are pleased to see this and take advantage of the utility it provides. This also enables increased EV uptake. Our member CPOs understand that what is good for the industry, including consumer confidence, ultimately serves them through higher EV uptake, efficient utilisation of infrastructure and the resulting increased revenue.

We note the department will be seeking input from some of our members and real-world examples to feed into the assessment over the next 3 years, and the EVC stands ready to assist during this consultation period.

Should you wish to discuss anything related to this, please contact us at office@evc.org.au.