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# Electric Vehicle Charging Infrastructure in NSW

Parliamentary Inquiry Submission – Inquiry No. 3095

Supplementary Questions – July 2025

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## Question 1:

*In your submission, you propose NSW adopt a model like the UK's Local Electric Vehicle Infrastructure Fund. Can you explain how a similar program could operate in NSW's regulatory and market environment?*

### Key Elements and Objectives of the UK LEVI Model

The UK's Local EV Infrastructure (LEVI) Fund helps local authorities in England plan and deliver charging infrastructure for residents without off-street parking, with two main objectives: 'deliver a step-change in the deployment of local, primarily low power, on-street charging infrastructure' and 'accelerate the commercialization and investment in the local charging infrastructure sector.

The program is structured around planning for the EV charging needs of the local community, coordinated by Councils, but in conjunction with all stakeholders including CPOs and DNSPs. Infrastructure deployment and operation is tendered to industry, encouraging private investment that complements and multiplies government funding.

- **Funding: £380.8M** to deliver 100,000 charge points, co-funded by private industry<sup>1</sup>.
  - ~90% of funding to subsidise Councils to tender to CPOs for supply, installation and operation of charging infrastructure.
  - ~10% of funding to support Councils to develop their capability to plan, procure and manage EV charging infrastructure. projects (~10%).
- **Support body for technical expertise, data and capability training** - The LEVI Support Body, made up of the Energy Saving Trust, Cenex, and PA Consulting, offers

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<sup>1</sup> [Charging into the future: government set to deliver over 100,000 more EV chargepoints - GOV.UK](#)

comprehensive support to local authorities in funding, procurement, project monitoring, and knowledge sharing. This includes formal training programs for council staff and an open data platform with essential EV charging planning data.

- **Capital allocation prioritises equity and need** - method takes into account charge point density, socio-economic index, rurality and EV uptake.
- **Program structured to promote private investment through competitive tenders** - concession contracts allows private operators to fund, install, and manage the charge points, with authorities awarding contracts based on value and alignment with public needs (typically 15 year term). This structure reduces risk for local councils and promotes sustainable, long-term investment in EV infrastructure through revenue-sharing opportunities for private operators.
- **Mature program:** The LEVI program has incorporated revisions from the earlier ORCS program, as well as the pilot LEVI program. Policy makers in Australia have the benefit of this hindsight. For example, the LEVI program has refined and improved to further support local authorities and also to help reduce barriers to deployment of infrastructure.

As of May 2025, there were 80,000 public charge points in the UK, with 3,000 installed in April alone (one every 29 minutes). An additional 100,000 charge points are expected to be installed as a result of the government's LEVI Fund<sup>1</sup>.

Further information about the operation of the LEVI fund can be found in the UK Office for Zero Emissions Vehicles LEVI Information pack:

<https://energysavingtrust.org.uk/wp-content/uploads/2024/09/LEVI-capital-fund-info-pack-v13-T2.pdf>

## Adaptation for NSW's Regulatory and Market Environment

**Local Government Leadership:** NSW could establish a similar program where local councils (rather than DNSPs) lead kerbside charging infrastructure development. This would involve councils, or Regional Organisation of Councils (ROCs), taking the coordinating role, similar to how UK local authorities operate under LEVI. Local governments in Australia already have established roles in managing local infrastructure and services. As with any model to deploy charging infrastructure, a successful outcome will require upfront planning hence the need to ensure Councils are equipped with the necessary resourcing, tools and support to provide the best outcome for drivers and community alike.

**Competitive Infrastructure Deployment:** The NSW model could require Councils to tender infrastructure development and operation to private CPOs through competitive processes. This maintains competition at the infrastructure level while ensuring public sector coordination of strategic placement and planning. Competition and innovation at the retail level is achieved by ensuring there are multiple CPOs serving each area, each fighting for customers through innovation in technology, services and propositions.

**Funding Structure:** Similar to LEVI's dual approach, NSW could provide:

- Capability funding to build local government expertise in EV infrastructure planning.
- Capital grants to CPOs for infrastructure deployment, allocated through local tender processes.
- Support services to promote success of the program, replicating the LEVI program, including Procurement and Program Management, Commercial expertise and Technical infrastructure expertise.

## **Role of DNSPs in the NSW LEVI Model**

Rather than owning infrastructure, DNSPs would play several critical enabling roles:

**Network Data Sharing and Planning Support:** DNSPs would provide councils and CPOs with comprehensive network capacity data, constraint mapping, and load forecasting to optimize charging point placement. This includes sharing information about network capacity, peak demand periods, and areas where there is sufficient capacity without the need for network augmentation.

**Streamlined Connection Processes:** DNSPs would establish service level agreements (SLAs) for EV charging connections, providing certainty around connection timeframes and costs. This addresses current industry concerns about connection delays that can impact project viability.

**Innovative Tariff Design:** Evie Networks already works with Ausgrid on the EA964 tariff trial, which encourages reduction of demand during peak network events. There is more that needs to be done, including extending tariff trials to other DNSPs and beyond current utilisation limits, as well as accommodating innovation in the CER space.

**Innovation with Connections, Demand Management and Grid Services:** There are no options today for flexible low voltage connections. This means that connection sizes are limited by the available capacity during the few hours of peak demand events each year, with consumers paying DNSPs for latent network capacity for the rest of the year. Evie Networks welcomes working with DNSPs to facilitate flexible connections. This could also be extended to demand response programs where CPOs provide grid services like peak shaving and voltage support through coordinated charging management, creating additional revenue streams while supporting grid stability.

**Technical Standards and Safety:** DNSPs would maintain their role in setting technical connection standards, safety requirements, and ensuring grid code compliance for all charging infrastructure.

**Network Investment Coordination:** DNSPs would work with councils to align network augmentation plans with charging infrastructure rollout timelines, ensuring grid capacity is available when needed while avoiding over-investment.

## **Minimal Regulatory Changes Required**

A UK LEVI style approach would operate within NSW's existing electricity regulatory framework, avoiding any need for changes to the regulatory framework, which would otherwise significantly slow down future deployments. Instead, a focus on addressing current barriers to deployment, including slow and costly connection processes, and tariffs that are not designed with EV charging in mind, would help to accelerate deployment.

Minimizing regulatory changes while addressing current barriers to network deployment would be the optimal way to accelerate new EV charging infrastructure deployment. This approach removes the need for complex regulatory reform processes that could delay implementation by years, while immediately addressing the competition concerns around DNSP market entry and providing a clear pathway for competitive infrastructure deployment through established procurement processes.

Evie Networks' original submission included an expert review of Kerbside EVCI charging options by Tahu Consulting<sup>2</sup>, comparing a coordinated approach similar to the UK LEVI program with the DNSP Mandate model that has been proposed by DNSPs. This document is referenced and attached with this submission.

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<sup>2</sup> Economics of NSW Kerbside Electric Vehicle Charging Infrastructure, Tahu Consulting 2025 - See attachment for full report

## Question 2:

*In your submission, you state that Australia can learn from global examples where large scale local EV charging was achieved without regulatory changes or a DNSP mandate model. Can you elaborate on some of these relevant international examples?*

In Section 6 of Evie Networks' original submission, we highlighted two successful examples of coordinated kerbside charging infrastructure deployment, being the UK LEVI program and the National Agenda for Charging Infrastructure (NAL) program in the Netherlands. The UK and EU member states provide the most relevant comparisons, as the regulatory frameworks for each are more similar to Australia's framework than North American and Asian markets.

As mentioned in Question 1, further information about the operation of the LEVI fund can be found in the UK Office for Zero Emissions Vehicles LEVI Information pack:

<https://energysavingtrust.org.uk/wp-content/uploads/2024/09/LEVI-capital-fund-info-pack-v13-T2.pdf>

Evie Networks has been in contact with the Office for Zero Emissions Vehicles in UK who run the LEVI program. We can offer to put the Inquiry team in contact with suitable representatives.

Finally, we are not aware of any successful DNSP mandate models in markets that have a similar regulatory framework to Australia. We note that the recent CitiPower, Powercor and United Energy request to the AER for a waiver to deploy kerbside charging referenced "*numerous successful examples globally 2 where electricity distributors have implemented EV charging facilities*" but the only examples provided were in Canada, which has a vastly different regulatory framework, characterised by vertical integration and provincial jurisdiction. We consider those references to be very weak and it demonstrates that DNSPs have not fully considered the globally unique model that they are proposing.

For reference, we have repeated some of the information provided in our original submission below:

Where DNSPs have failed to provide any relevant and successful examples of a the DNSP Mandate model they are proposing, Evie Networks has conversely demonstrated that successful models involve public-private partnership. For completeness, we repeat some of the information provided in our original submission below.

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The global evidence suggests that a market-led co-funding model outperforms centrally planned state driven EV infrastructure policy:

- Of the ten countries leading EV uptake, 9 predominantly use private-public-partnership models to achieve scaled charging roll outs, rather than state owned infrastructure. The only exception is China, which has a very different market and regulatory framework to Australia.

- In Japan<sup>3</sup> and Korea<sup>4</sup> centrally planned directives under a “build it and they will come” approach resulted in overspending, stranded chargers, and low EV adoption relative to investment.

EV Adoption & Charger Infrastructure by Country													
	Top 10 countries by EV adoption										Other cases		
Region	NOR	ICE	DEN	SWE	NLD	BEL	FIN	CHN	SWI	UK	KOR	JPN	AUS
% EVs	29%	18%	11%	11%	8.3%	8.2%	8.1%	7.6%	5.8%	5%	2.4%	0.8%	1.2%
% sales	93%	71%	46%	60%	35%	41%	54%	38%	30%	24%	7.9%	3.6%	12%
Chargers	1:33	1:28	1:18	1:16	1:5	1:11	1:19	1:8	1:17	1:30	1:3	1:17	1:66
Policy	PPP-driven; public grants & private ops; partial state involvement; no regulated monopoly	Early public buildout; now mostly private w/ govt co-funding for rural areas	Incentives for private market; targeted subsidies fill gaps	Govt grants catalyze private deployment; no state monopoly	City-driven PPPs; tender to private ops; some direct public ownership	Regional PPP concessions; no national monopoly; municipal partnerships	Modest govt support + EU funds; private-led competitive market	Hybrid central planning; state utilities + private ops; competitive subsidies	Market-driven with PPP coordination by federal govt	Market-led; govt grants & regulation; no state monopoly	Shifting from state-led to PPPs; growing private role; centrally planned	Subsidy-driven collaboration; auto, local govs & private ops	Initial company investment with private operators

 Centrally planned approach

Figure 1 - Comparison of EV adoption and charger deployment by region.  
Sources: IEA Global EV Data 2024 (data series ends 2023).

## Two leading programs from the Netherlands and United Kingdom demonstrate market-led approaches that deliver superior outcomes

Both frameworks channel public money into de-risking demand signals and local planning capacity, while leaving capital deployment and customer proposition to competitive Charge Point Operators (CPOs). They have produced dense networks, fast delivery and scaled up private-investment multiples–outcomes NSW can replicate by keeping DNSPs in an enabling, not owning, role.

	Netherlands	United Kingdom
Key programs	National Agenda for Charging Infrastructure (NAL) regional concessions	<ul style="list-style-type: none"> <li>On-Street Residential Charge-point Scheme (ORCS) 2017-24</li> <li>Local EV Infrastructure (LEVI) Fund 2023-30</li> </ul>
Scale delivered	~175,000 <sup>5</sup> installations nationally	~75,000 <sup>6</sup> installations nationally, of this LEVI + ORCS: ~10k delivered, ~29k contracted.
Who pays?	<b>Today:</b> 100% private capex. <b>Historically:</b> ~30-50% public subsidy.	<b>Today:</b> Up to 40% public capex. <b>Historically:</b> up to 75% public capex.
Roles	Municipality awards concession; charge point operator finances, connects, installs, operates; Network only approves technical connection (no asset ownership).	Local authority plans sites, tenders long-term contract; Charge point operator finances & operates; Network provides connection under regulated timelines

<sup>3</sup> Bloomberg News, [Japan Doesn't Have Enough Electric Cars for Its EV Chargers](#), 25 August 2021.

<sup>4</sup> Despite having a high ratio of public chargers to cars, adoption has stalled at 9-10% of new car sales [\[Roland Berger analysis 2024\]](#), and that charging issues still rank as a key blocker for EV Uptake despite the density of charging [\[Roland Berger analysis 2023\]](#).

<sup>5</sup> McLoughlin, L. (2025, February 19). [Europe reaches 1 million public EV charge points, set to double by 2029](#). Electric Vehicle Charging & Infrastructure.

<sup>6</sup> Department for Transport. (2025, February 5). [Electric vehicle public charging infrastructure statistics: January 2025](#).

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<b>Scale delivered</b>	~175,000 <sup>5</sup> installations nationally	~75,000 <sup>6</sup> installations nationally, of this LEVI + ORCS: ~10k delivered, ~29k contracted.
<b>Trigger and planning tools</b>	Statutory right-to-charge - any EV owner without a driveway can request a charging post. Responsible CPO must site within 300m of residence. <sup>7</sup>	Triggered by local council tender processes. Planned through the NEVIS data platform - aggregation of demand, grid capacity, charger density information to capability officers who rank need. <sup>8</sup>
<b>Grid service level</b>	Grid operator screens sites but does not own assets. Connection deadlines baked into overall concessional contract to CPO - typically 12 weeks. <sup>9</sup>	Grid operators screen sites but do not own assets. Regulations require grid operators to assess low voltage sites ≤15 working days with compensation to CPOs for delays. <sup>10</sup>
<b>Key policy innovation</b>	Demand signal locked in up-front; concession bundles grid connections, on-street permits and utilisation guarantees, letting CPOs finance at low risk.	Separates capability funding (policy, traffic order, community engagement staff) from capital grants, accelerating councils that previously had no in-house expertise.
<b>Equity wins</b>	No regressive cross-subsidy. Captures renters. Equal access for all drivers of need.	Capability grants create jobs and capacity within local councils, including remote / small. Planning criteria specifically targets households with no driveways.
<b>NSW take-away</b>	Pass a NSW Right-to-Charge & bundle multi-council concessions. Keep DNSPs as facilitators, not owners.	Replicate LEVI's capability granting and shared data platform model. Establish a mandatory guaranteed connection time for low voltage sites.

<sup>7</sup> Guidehouse. (2021, November). [Lessons from the Dutch EV charging approach: Prepared for COP26 Transport Day for SSN-Distribution](#). Guidehouse Inc.

<sup>8</sup> Cenex (October 2022). Article - [Over 75 Local Authorities register for new EV infrastructure service](#).

<sup>9</sup> NKL Nederland. (2018). [Uniform Standards for Charging Stations – EN-V1.0](#). Netherlands Knowledge Platform for Public Charging Infrastructure.

<sup>10</sup> Energy Saving Trust. (2025, March 6). [Connecting electric vehicle chargepoints to the electricity network](#). UK Government. [The Electricity \(Standards of Performance\) \(Amendment\) Regulations 2023](#) (SI 2023/887).

## Question 3:

*Are you satisfied with the current data transparency obligations of DNSPs*

In answering this question, we consider five areas where DNSPs are obliged to be transparent, but are found to be lacking.

1. **Network planning:** Despite their central role in the electricity system, DNSPs currently demonstrate little evidence of system-wide coordination regarding EV infrastructure. They typically respond to individual connection requests in isolation, without considering the broader context of EV adoption or charging needs. This piecemeal approach leads to inefficient network utilisation and higher costs for all stakeholders.

We suggest that DNSPs focus on opening up access to networks, enabled by extensive data sharing and streamlined processes that consider the broader EV charging rollout requirements of their customers.

If successful with gaining approval for the proposed DNSP Mandate model, DNSPs will have privileged and exclusive access to network data that they do not share with external partners or industry. DNSPs will then naturally plan deployments and reserve network capacity for themselves. When others apply for a connection the capacity will already have been reserved, forcing others to pay for expensive augmentations.

2. **Network connection costs:** We noted in our original submission that Evie Networks experiences substantial variation in connection costs between similar sites. We noted that Evie was recently quoted more than \$20k by a Victorian DNSP to assess the cost of a power augmentation, ie. a quote for a quote. While the cost per hour is in line with AER guidelines, the hours or work required to perform the work are not scrutinised.

Evie is not saying that the DNSP in this instance is acting against current AER guidelines, but we are saying that AER rules allow DNSPs to create these barriers and that DNSPs, acting rationally, are taking advantage of inadequate AER rules (and loopholes) in order to maximise profits.

Evie can provide many more, similar examples to the above.

3. **Tariffs are not cost-reflective:** In our original submission we noted that public EV charging is good for the grid, and DNSPs publicly agree. The reasons are that public EV charging increases network utilisation and efficiency, soaks up solar with peak demand in the middle of the day, and comprises equipment that is highly controllable to otherwise avoid network peak events.

Apart from Ausgrid's EA964 tariff, which is limited to low utilisation sites, there are no other examples of tariffs that recognise the benefits that public EV charging provides for the grid. Evie Networks submitted a report to the AER, by Marsden Jacobs<sup>11</sup>, that

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<sup>11</sup> Review of Ausgrid's Revised Network Tariff Proposals and the Australian Energy Regulator's Draft NSW DNSPs' Tariff Determinations: Are They Reasonable? – Marsden Jacobs 2024



demonstrates Ausgrid's standard tariffs are not cost reflective. This means that apart from selected charging stations that are eligible for Ausgrid's EA964 tariff, Evie Networks is paying a price for electricity that is not cost reflective. The consequence is that drivers need to be charged more for access to our charging network, thereby creating a barrier to the EV transition.

4. **DNSP Capex reporting:** Every year DNSPs are required to report on the required investment for their respective networks. The incentive for DNSPs under the regulatory framework is to maximise investment, thereby maximising guaranteed returns under the RAB. While Evie Networks is not an expert in this area, we do note that there has been a well-documented history of gold plating by DNSPs that has resulted in higher electricity prices for all consumers.
5. **DNSP Mandate proposal:** DNSPs have made sweeping statements in public forums, claiming an ability to roll out infrastructure faster and cheaper than industry. There has been no meaningful data provided to support their lobbying. We provided the AER with the following assessment of DNSP claims that are relevant to any DNSP proposing to expand their monopoly.

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The assertion by CPU and other DNSPs that they can provide kerbside EV charging more cost-effectively than competitors is not true. DNSPs are already able to deploy EV charging via their competitive business units and if they have a genuine cost advantage, they should simply focus on deploying through these competitive business units, and avoid distorting the market.

DNSPs claim that they have a lower cost base than their customers, however this is not been verified. When challenged on its asserted \$6,500 unit cost—around half the market rate—CPU replied, "I won't get into the reasons why that is". Absent a Bill of Materials or tender evidence, the AER cannot 'test the information'.<sup>12</sup>

The costs that DNSPs charge their customers are meant to be cost-reflective. Either DNSPs fees are not cost-reflective, or the network cost base must be the same as customers.

A basic principle of competitive markets is that they will always operate more efficiently than monopolies. DNSPs cannot match the lean operations and focus of their customers and should not attempt to compete.

As a demonstration, industry benchmarking shows network-delivered community batteries cost \$2.30 per kWh compared to \$1.33 per kWh for non-network providers—a 73% premium.<sup>13</sup>

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<sup>12</sup> AER, 'Transcript – DNSPs and its related entities' (5 May 2025), 8.

<sup>13</sup> AER, 'Transcript – contestable businesses' (7 May 2025), 13.

Not only will industry work harder for customers, innovating at greater pace and providing better service, the cost base for industry will be lower than for DNSPs. This is assuming that DNSPs are counting all costs associated with a viable rollout model.

It follows that DNSPs do not have any cost advantage without changing ring-fencing rules, that will allow them to cross-subsidise and discriminate:

- Reduced project costs if DNSPs do not engage with Local Councils and do not reserve car parking spaces for charging. In this case all consumers will be left to cross-subsidise inefficient assets under the RAB.
- No Facilities Access charges for DNSPs. DNSPs have stated in the AER workshop that they won't charge themselves for access to the pole. This is clearly discriminatory. Furthermore, by deploying on poles themselves, DNSPs will be foregoing Facilities Access revenue, which would otherwise benefit all consumers.

**Consumers will be the losers:** Monopolies with guaranteed returns have no incentive to operate efficiently or innovate. A competitive landscape will always provide a better outcome for consumers.

See the table below for an analysis of the relative position of DNSPs vs industry to provide an efficient rollout of infrastructure. Clearly industry, working in a competitive environment, is best placed to provide for the EV charging infrastructure that is required to facility the transition to electric for all consumers.

Cost area	Requirement	Cost in favour of:	Assessment
Local Council and Community Engagement	<p>Choosing bays that align with community needs.</p> <p>Paying license fees.</p> <p>Upfront project coordination.</p>	Industry / competition	<p>Greater agility and requirement to ensure best community outcome to ensure asset utilization.</p> <p>If DNSPs choose not to reserve parking spaces, assets will be underutilised and consumers will pay.</p>
Network connection and tariffs	Acquire electricity connection from DNSP.	Equal	Costs are meant to be cost-reflective
Equipment procurement	Identify and select equipment for network rollout.	Industry / competition	<p>Greater agility and low procurement overhead.</p> <p>Large incumbents often charged more by suppliers to cover high procurement overhead.</p>
Construction	Electrical and civil works	Industry / competition	In contestable markets, private contracts are always lower cost than DNSP incumbents.
Product development	Software and operations to service customers	Industry / competition	Low overhead and no legacy systems integration. Option to use best of breed technology.
Operations and Maintenance	Remote operations, customer service and field force	Industry / competition	<p>Industry will use many of the same private contractors for remote field force.</p> <p>Industry not burdened with legacy system integration.</p>
Facilities Access	Facilities Access Agreement	DNSPs	<p>DNSPs have stated publicly and in the AER workshop that they won't charge themselves for Facilities Access, demonstrating clear discrimination.</p> <p>Note that facilities access revenue is meant to be for the benefit of consumers, so in this case consumers will miss out.</p>