

**Submission
No 19**

**INFRASTRUCTURE FOR ELECTRIC AND ALTERNATIVE ENERGY SOURCE
VEHICLES IN NSW**

Organisation: EVSE
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EVSE AUSTRALIA
**Submission to Inquiry into Infrastructure for Electric and
Alternative Source Vehicles in NSW**

29th April 2025

EVSE Australia welcomes the opportunity to contribute to the Legislative Assembly Committee on Transport and Infrastructure's Inquiry into infrastructure for electric and alternative energy source vehicles in NSW.

This submission addresses the following Terms of Reference:

- (a) Funding of electric vehicle chargers;
- (c) Use of existing infrastructure and policies to ensure a competitive EV charging market, including ring-fencing arrangements.

EVSE is one of Australia's largest electric vehicle (EV) charging providers, offering end-to-end solutions that integrate hardware, software, and installation services. As a majority-owned subsidiary of Intellihub Group, we benefit from shared innovation across energy metering, data integration, and grid services. Together, we have delivered over 50 pole-mounted kerbside chargers across 8 NSW councils under an ARENA-funded project, and over 30 kerbside AC and DC chargers through NSW government kerbside funding, testing their ability to support grid integration and virtual power plant functions.

Use of Existing Infrastructure and the Role of DNSPs

Access to power poles and network connection is the only essential DNSP infrastructure required for EV charging services. These services are already accessible to competitive providers under the National Electricity Rules, and ring-fencing does not obstruct this access. No additional regulatory reform is necessary to enable the deployment of chargers using existing infrastructure.

Proposals from NSW Distribution Network Service Providers (DNSPs) to remove ring-fencing obligations would unfairly advantage DNSPs and risk distorting the competitive market. These proposals effectively seek to allow DNSPs to construct and own new EV charging infrastructure, recover costs through regulated electricity charges, and shift financial risk from investors to consumers. This undermines fair competition and contradicts the intent of ring-fencing protections.

Ring-Fencing and Market Competition

Ring-fencing rules prevent DNSPs from using their monopoly position and resources to gain an unfair advantage in competitive markets. They safeguard against:

- Cross-subsidisation from regulated revenues,
- Misuse of confidential customer information,
- Discriminatory practices favouring their own subsidiaries,
- Unfair branding or use of shared staff and assets.

If DNSPs wish to offer EV charging services, they can and should do so through separate, ring-fenced entities—just as Ausgrid has done through Plus ES. Notably, Plus ES is planning to install 1,000 kerbside chargers in NSW without needing regulatory exemptions. This proves ring-fencing is not a barrier to innovation or rollout.

DNSPs Are Not Best Placed to Lead EV Charger Rollout

There is no natural monopoly in EV charging—unlike energy distribution—making it unsuitable for regulated DNSP-led service. DNSPs have little to no experience with EV charging, and providing them with a de facto monopoly would reduce innovation, lock in specific technologies, and limit competition. A government- or DNSP-led model would also shift risk to electricity customers, many of whom do not own EVs and would be forced to subsidise chargers they may never use.

Competitive providers like EVSE are better placed to:

- Optimise charger locations based on demand,
- Innovate with evolving technology,
- Take on commercial risk and invest in cost-effective solutions,
- Provide tailored solutions for high-demand segments such as apartments and commercial fleets.

Funding and Support for Fair, Competitive Rollout

To accelerate EV charger deployment, we support increased contestable funding through programs like the NSW Kerbside Charging Grants and EV Ready Buildings grants. Additional measures we recommend include:

- Expanding feasibility studies and subsidies for retrofitting existing apartments,
- Strengthening minimum EV infrastructure standards in new developments,
- Collaborating with local councils on charging strategies and deployment targets.

These strategies would enable cost-effective and demand-driven rollout of infrastructure without compromising market integrity.

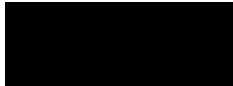
Conclusion

EVSE strongly opposes changes to ring-fencing requirements that would allow DNSPs to deploy regulated EV charging infrastructure. The current framework already allows DNSPs to participate fairly through ring-fenced businesses. Weakening ring-fencing protections would stifle competition, raise electricity prices, and deter private investment.

We encourage the Committee to support a level playing field that enables innovation, efficiency, and consumer choice—while ensuring NSW electricity customers are not burdened with the cost and risk of EV infrastructure better delivered through competitive markets.

We are happy to provide more detail on any of the issues raised above. If you have any questions regarding this submission please contact me at brendan.wheeler@evse.com.au

Kind Regards,



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