

**Submission
No 23**

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

Organisation: EVX
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Response to the Inquiry into Infrastructure for Electric and Alternative Energy Source Vehicles in NSW

EVX



INTRODUCTION

We appreciate the opportunity to contribute to this inquiry. EVX is actively involved in deploying and operating public EV charging infrastructure across NSW and nationally. We strongly support a competitive, consumer focused transition to electric and alternative energy vehicles, and wish to raise critical concerns about the role of electricity network monopolies in this transition.

We also have significant data and experience on the functional use of public EV charging infrastructure which we have deployed at scale in the Sydney Metropolitan area. EVX now operates more than 70 locations (140 charge points) in several Sydney LGAs.

Our experience and modelling based on real data, across these 140+ public access points provide us insights into user behaviour, council engagement and the commercial model for public charge point operators (CPOs). We would argue that our experience and customer base are unmatched in terms of locations, functional usefulness and speed to deployment over the last several months.

1. FUNDING AND LOCATION OF CHARGING INFRASTRUCTURE

We strongly caution against permitting Distribution Network Service Providers (DNSPs) to own and operate EV charging infrastructure within their Regulated Asset Base (RAB). Doing so risks distorting the market, entrenching monopoly control, and crowding out private investment.

Key risks of DNSP RAB ownership include:

- Market distortion: DNSPs benefit from guaranteed returns on regulated investments, allowing them to undercut private competitors.
- Stifled innovation: Competitive pressure drives innovation and efficiency. Monopoly ownership removes these incentives.
- Cost shifting to consumers: All electricity users may bear the cost of inefficient EV infrastructure, regardless of benefit.
- Barrier to new entrants: DNSP involvement raises the barrier for independent operators.

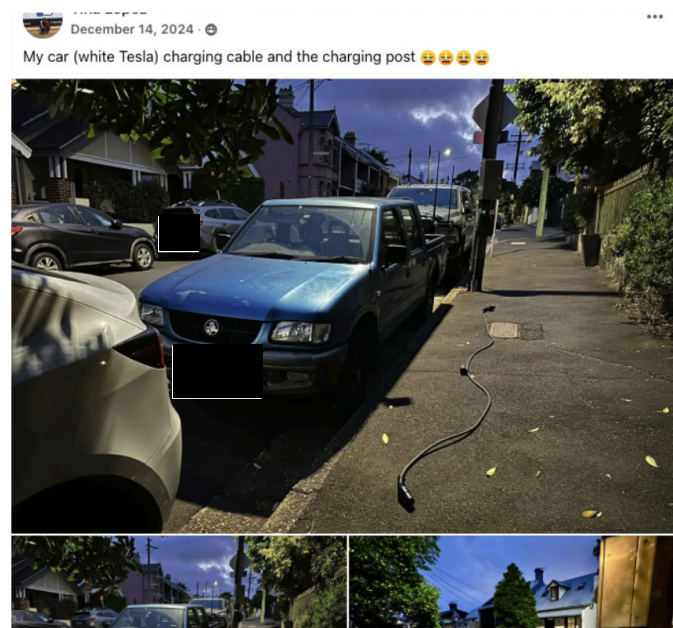
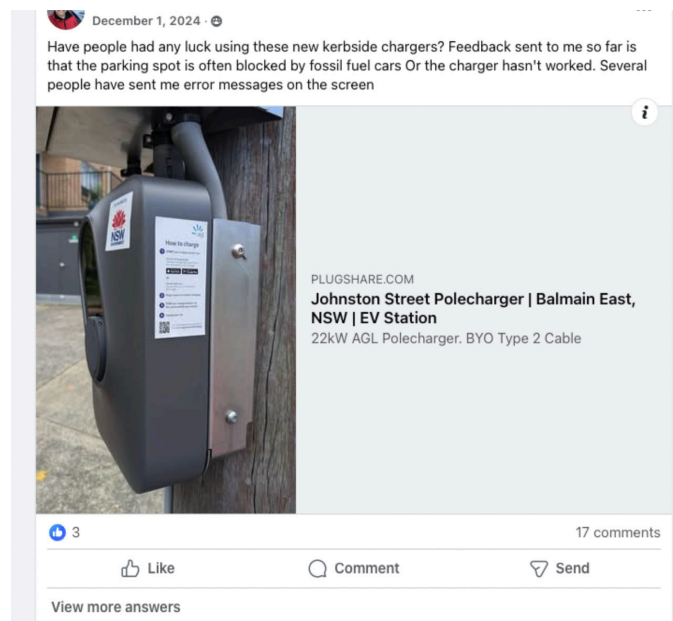
In parallel, partnership with local governments is essential to ensure charging infrastructure is not only built but also accessible and usable. Dedicated EV parking allocation, particularly in public streets, carparks, and council owned land, is a key determinant of successful deployment. Without guaranteed access to the charger, even the best located station becomes functionally useless. Public funding without secure access equals public waste. In the short to medium term, a coordinated state local government approach is needed to standardize EV parking allocation, signage, enforcement, and planning.

EVX have irrefutable data on precisely what the impact of undedicated parking locations adjacent to EV chargers does for:

- Community access and sentiment
- Utilisation and therefore usefulness to EV drivers
- Risks of misuse and conflict in the community when fair access to infrastructure is not provided

Community Access and Sentiment

The collective goal of deploying infrastructure is to drive the uptake of EVs by securing positive consumer sentiment and confidence among consumers to purchase EVs. We have a window into what a future, unilateral DNSP rollout may look like, within the Inner West of Sydney already. Through its unregulated related entity Plus ES, Ausgrid has started to deploy under a non-dedicated parking model. This has created much community angst, backlash, and forced EV drivers to take matters into their own hands as evidenced below:



Anonymous member
January 6 · 🌐

The 3 pole chargers in Rowntree St are constantly ICED. The one pictured has had these two utes sitting here for weeks. I've seen one user at a charger further down the street having to drape an extra long chord around a twin cab to use it. Let us know your observations - seems from other feedback on the page that this is a common problem.



Group expert · Rising contributor · January 16 · 🌐

Anecdotally, this seems to have helped the cause slightly. I've found this spot (Johnston st) unoccupied a couple of times in the two weeks the sign has been up. I suspect some (definitely not all) ICE vehicles who've occupied these EV chargers are doing so unwittingly.

How can we get the council to designate spots exclusively for EVs while charging?

*Write to the council each time you can't access a spot (council@innerwest.nsw.gov.au). The more noise the better.

*Ask - a couple of times I've asked drivers if they can park elsewhere. Other than one aggressive NO, they have complied.

*Can we engage the providers (AGL, EVX etc). When they start charging (\$), it will be bad business for them if the spots are mostly ICED.

*Other ideas?



Admin · Top contributor · March 29 at 11:43 AM · 🌐

Inner west council now needs to ensure All chargers are dedicated and available 24/7



SMH.COM.AU

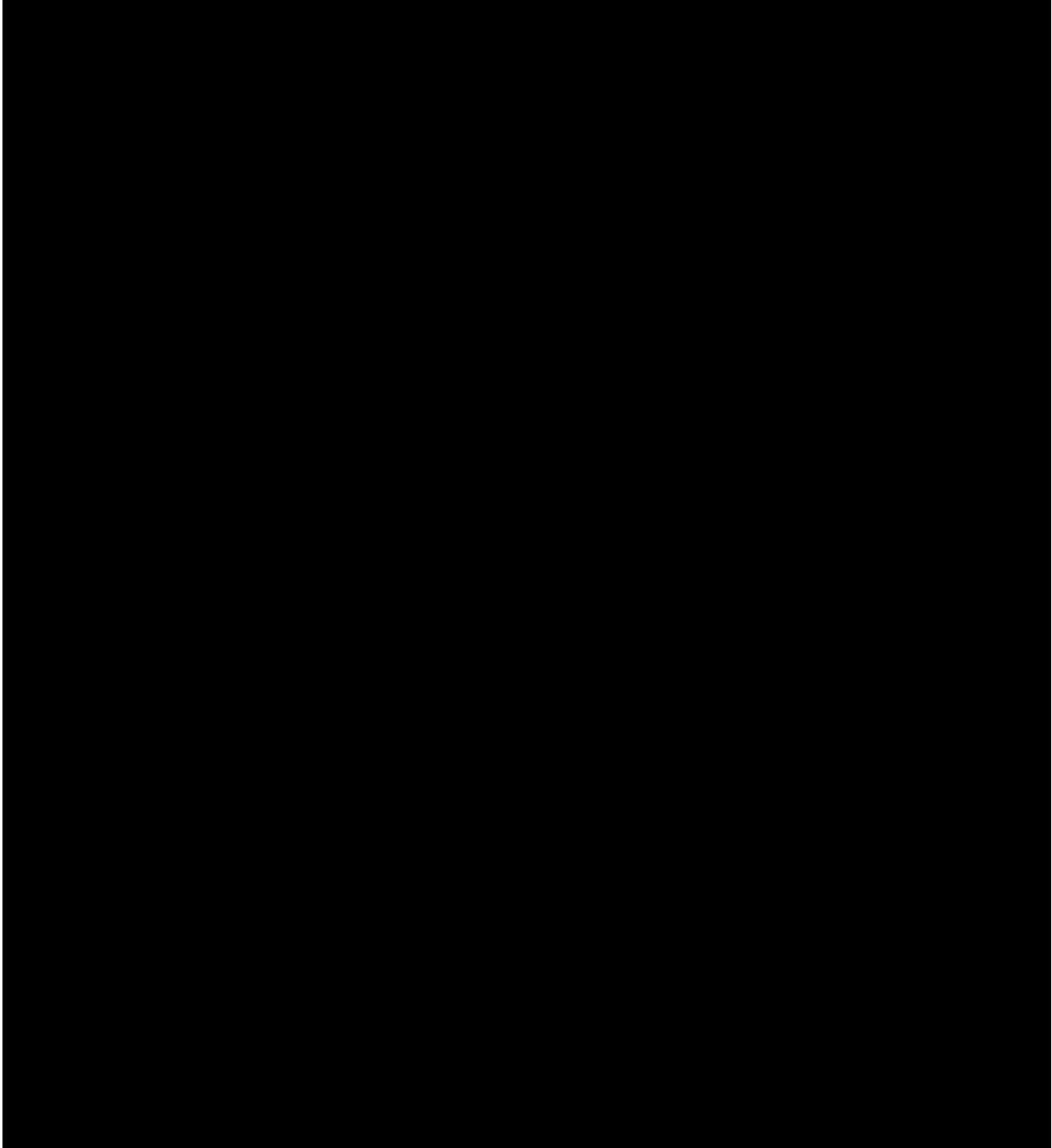
Is this stopping you from buying an electric vehicle?

Australians aren't buying enough electric vehicles – and there are a couple of reasons for t...

👍 6

1 comment

In contrast, EVX ensures dedicated parking by undertaking a significant consultation with councils and the community to ensure access, community acceptance and functional use. This collectively leads to better consumer sentiment and confidence.

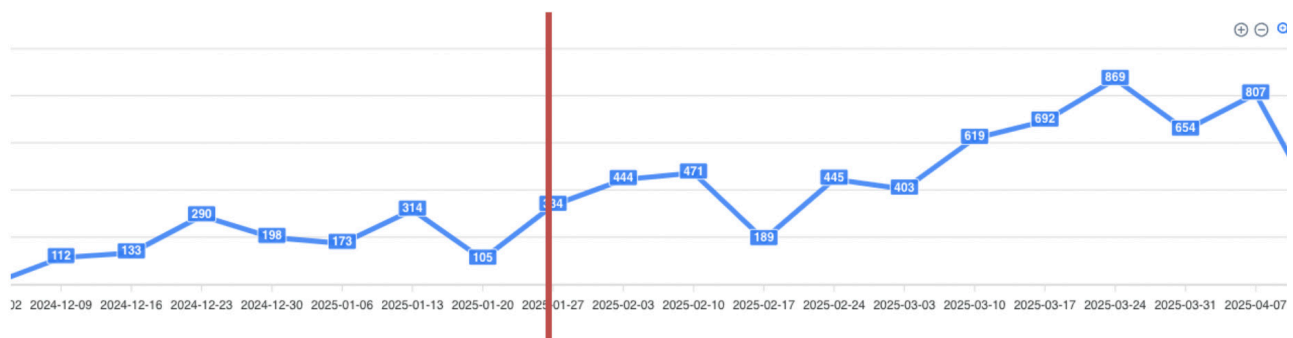


Finally on this point, it is important to highlight the impact on utilization of both proper placement of infrastructure with community consultation and dedicated parking and its impacts on functional usefulness of the infrastructure sentiment. and confidence.

Through our work with councils, we have inadvertently trailed a non-dedicated parking model through delays with line marking our deployed location and have found in the data that these locations generate 1% utilisation. This is in stark contrast to the current average in Sydney of established, dedicated parking locations of 20%.

20 times the use, in similar locations. DNSPs will not need to consider this if they are granted a regulated return on their assets. This will lead to disastrous customer outcomes.

See data below (line indicates installation of dedicated parking):



A selection of 5 locations before and after dedicated parking had been installed at those locations (energy delivered)

Recommendations

- State government continue with the delivery and administration of the highly successful kerbside charging grants programs, supporting industry to work with LGAs to deliver this infrastructure,
- Higher levels of scrutiny on proposals under this program that intend to use public funds that would deliver infrastructure that either, non dedicated parking locations and applications made by unregulated, related entities of the DNSPs or DNSPs themselves,
- Undertake a detailed review of infrastructure deployed to date under the program to ascertain the impact of the various models on user experience and consumer sentiment toward purchasing EVs,
- Provide a robust guidance framework to industry and LGAs on public / private partnerships, best practice and competitive market engagement.

2. VIABILITY OF ALTERNATIVE ENERGY FOR FREIGHT AND HEAVY VEHICLES IN REGIONAL COMMUNITIES

We support further investigation into hydrogen and renewable fuels for heavy vehicle corridors, but stress these should remain competitive, technology neutral programs open to non utility actors.

The government can signal the private sector here to invest in charging infrastructure for heavy vehicles and consumers by utilizing similar grant program instruments to those used for destination, fast charging and kerbside charging.

Recommendations

- Specific programs devised for heavy vehicle infrastructure that focus on DC and battery backed DC chargers with parking and size specifications useful for heavy vehicles, including at highway rest areas and commercial premises.
- DNSPs providing far greater clarity into network capacity and constraint to support heavy vehicle charging infrastructure in their service areas.
- The provision of an investment and project roadmap from DNSPs to better supply the required capacity along clearly identified routes, worked through with the heavy transport sector and state government.
- The creation of industry demonstration projects to highlight findings of projects that allow operators to trial and test regional electrification of their heavy vehicle fleets.

3. USE OF EXISTING INFRASTRUCTURE AND MARKET COMPETITION

We oppose any policy framework that allows DNSPs to extend their monopoly advantage into downstream consumer services, including:

- Public EV charging,
- Behind the meter energy management,
- Battery storage aggregation,
- Consumer DER.

Allowing DNSPs to vertically integrate into these markets would erode competitive neutrality and consumer choice. Regulatory 'ring fencing' must be strengthened, not relaxed, to ensure DNSPs focus on enabling fair grid access rather than leveraging their position to dominate adjacent markets.

In addition, DNSPs continue to impose disproportionately high costs on competitive market participants for basic access to infrastructure such as power poles. These costs, including excessive site nomination fees, connection application charges, facility access costs, and administrative overheads, are a major barrier to scalable EV infrastructure deployment.

For example, EVX currently pays a site nomination fee to the DNSP that represents 10% of our total CAPEX on most sites, before a single shovel hits the ground. These fees do not include grid connection charges, augmentation costs, or ongoing access fees, many of which remain opaque and unpredictable particularly for DC charging operators.

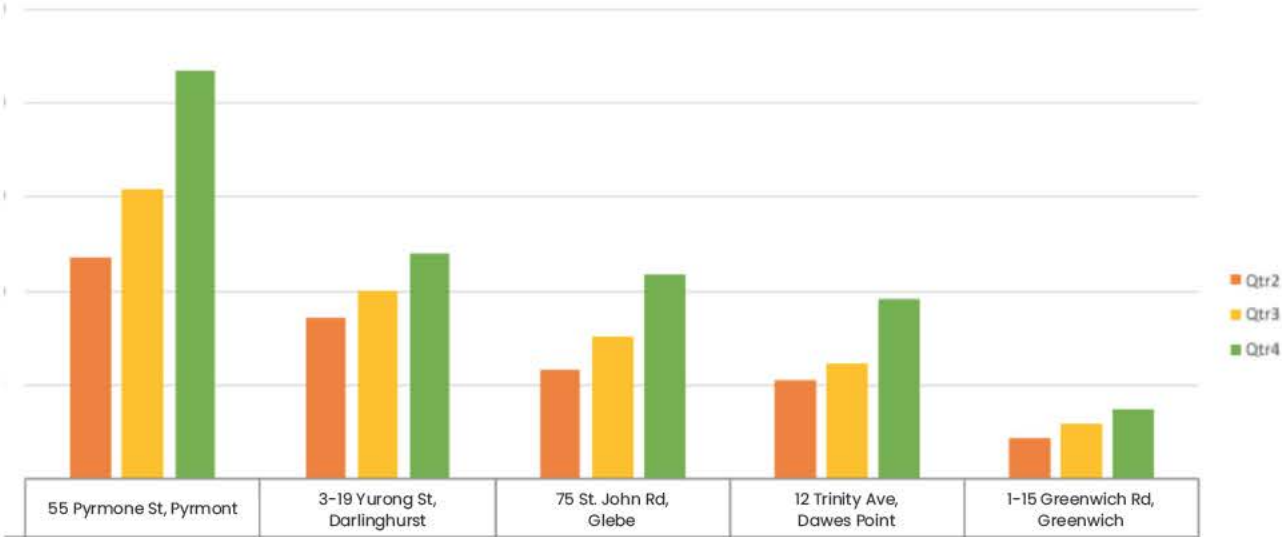
If DNSPs were required to make these charges cost reflective and transparent, it would unlock a step change in private sector investment and accelerate deployment. Simply reducing unjustified administrative and access charges could catalyse far greater network coverage without requiring additional public funding.

Importantly the narrative from DNSPs currently is:

- Infrastructure cannot be deployed at pace without their involvement
- The commercials do not stack up for Kerbside EV charging

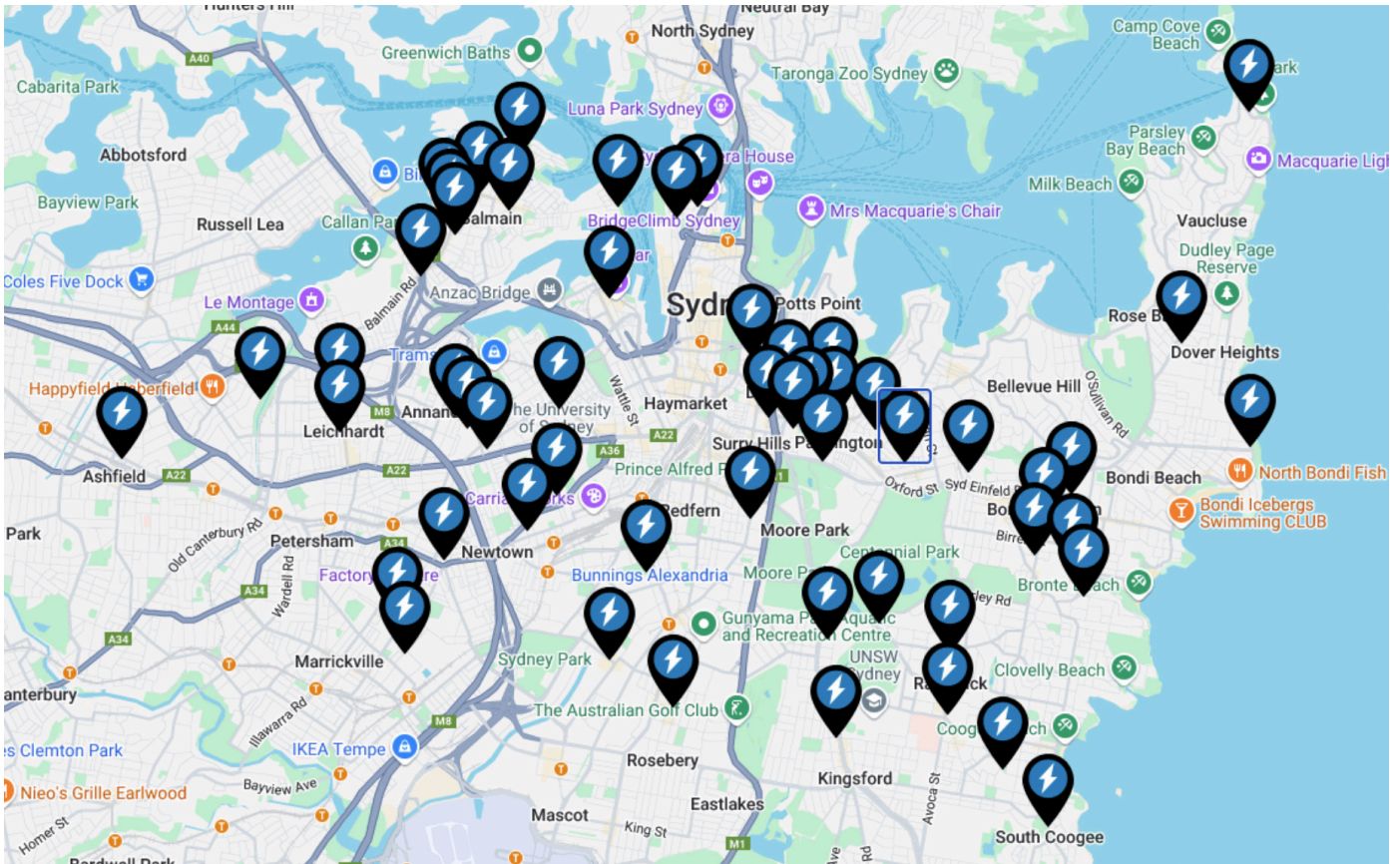
These statements have no basis in fact and are harmful to the market.

Even with the current administrative cost base imposed on the market there is a strong commercial model that has been established for kerbside EV charging, particularly when rolled out under a considered approach and ensuring consultation with the community. There is strong growth in utilization of the infrastructure that EVX have deployed each month to date:



Quarterly utilisation of current sites across a selection of use cases

Furthermore, EVX in a short time have deployed a significant number of charging sockets under the NSW kerbside charging grants program. From Q3 2024 to the end of May 2025 (over a period of just 26 weeks) EVX will have deployed 72 locations housing over 140 public charge points, all with dedicated parking. That is more than 5 chargers each week and all in a concentrated Sydney Metropolitan area. EVX continues to deploy up to 20 charge points per week under various projects with LGAs in NSW and now expanding this work to VIC, SA and the ACT.



Recommendations

- Strengthening or ring fencing rules to ensure DNSPs are unable to deploy assets in their RAB that traditionally belong in contestable markets,
- Tightening regulatory sandboxing to ensure that customer benefit and technical innovation remain at the forefront of decision making and ensuring that industry are engaged before waivers or approvals are granted to establish a demonstrable market gap,
- DNSPs are directed to cease market messaging, PR and marketing that is in contravention with current ringfencing guidelines, actively defaming the competitive market and spreading disinformation around market capability,
- That the NSW government undertake a review into market activity to independently determine claims being made by industry and utilities,
- That government and regulators demand transparency on non regulated fees being charged to the market by DNSPs for network access.

4. TRANSITION SUPPORT FOR WORKERS AND INDUSTRY STANDARDS

We support investment in upskilling and retraining workers from carbon intensive industries. However, transition support should not be a backdoor for DNSPs to justify asset or activity expansion into competitive markets under the pretext of 'supporting the transition.' Market growth should be driven by customer value and expanding competitive capability across impacted markets, not monopoly expansion.

Recommendations

- A market study of impacted workers and industries to understand cross training and transition opportunities
- Government supported training for affected workers
- The delivery of a government registry of trained workers and opportunities to connect workers, companies and projects as an initial point of connection

5. OTHER RELATED MATTERS – RISKS OF DNSP BUSINESS MODEL EXPANSION

A broader concern is the DNSPs' growing appetite to expand into traditionally competitive domains, including unintended consequences such as:

- Ownership of consumer energy assets,
- Mandating participation in virtual power plants (VPPs) to receive rebates and funding for CER programs
- Direct engagement in energy retail or aggregation.

This represents a systemic risk to consumer outcomes:

- Reduced competition = higher prices, less choice.
- Misaligned incentives = DNSPs profit from asset growth, not innovation.
- Increased regulatory complexity = opaque cross subsidies and consumer cost recovery.

A low cost, innovative energy future depends on clear boundaries between monopoly infrastructure and open markets. DNSPs must not be allowed to bolster their regulated returns with participation in opaquely defined delivering unregulated profits. What is not often discussed is the network tariff component of consumer energy bills and the other ways in which regulated monopolies can sidestep regulated returns to derive additional profit.

Rather than creating efficiency and right sized infrastructure spending in the face of reduced reliance on the grid from consumers, DNSPs are seeking to fill those gaps by participating in competitive markets in addition to further "gold plating" their regulated returns. This will have significant impacts on electricity prices for consumers and destroy traditional competition and innovation which is critical during the clean energy transition particularly to deliver the perceived benefits of cheap, clean energy.

EVX and other private market participants pioneered the concept and subsequently, local manufacturing of solutions to meet the pole mounted EV charging use case. Demand is being met at a significant pace and with a high degree of quality. DNSPs are now looking to hijack the private sector activity for their own gain and using low cost, low quality, foreign manufactured equipment. This is not the role DNSPs should be playing in the transport electrification sector.

DNSPs do however have a critical role to play in readying networks and network systems to facilitate the transition. They need to focus on areas that will encourage investment in the energy system on behalf of consumers.

Finally we have grave concerns for the industry bodies set up to advocate for the EV infrastructure and energy market participants. There has been extraordinarily outsized influence exercised in the Electric Vehicle Council (EVC) for instance, leading to reversal of sensible policy positions in favour of regulated monopolies.

The state government has historically relied very heavily on the advice of the EVC to consult on policy and industry feedback. We believe that position and advice has now been compromised and is not representative of the vast majority of market participants.

Recommendations:

- That regulators and Governments undertake a review to determine the roles and responsibilities of regulated monopolies, industry associations, companies and academia in delivering an impactful transition to renewables in all aspects including energy generation, storage and transport.
- Strengthen ringfencing to ensure delivery of that strategy to the benefit of the consumer and capability building in adjacent industries.
- Scrutinise and monitor both DNSPs, their related entities and industry when supporting, funding and promoting these projects to ensure customer benefit is derived in no uncertain terms,
- Undertake more significant and ongoing consultation with industry to ensure equitable access to policy and decision makers rather than relying on industry associations that in our view have been compromised.
- That DNSPs are forced to deliver public strategies outlining their investment and infrastructure planning directly linked to delivering better CER outcomes and industry support.

CONCLUSION

We urge the Committee to recommend policies that reinforce a competitive EV infrastructure landscape. This includes:

- Prohibiting regulated asset ownership of public EV charging infrastructure,
- Strengthening ring fencing obligations for DNSPs,
- Enabling independent providers to access grid connections and funding fairly,
- Working with local governments to ensure dedicated EV parking accompanies any infrastructure rollout.
- Continuing to support a willing and able competitive sector particularly where local manufacturing is part of the supply chain.

We remain available to provide further insight and welcome ongoing dialogue with the Committee.



EVX