Victorian Parliament Inquiry into Electricity Supply for Electric Vehicles

NECA SUBMISSION

Oct 2025

national electrical and communications association

The Hon Georgie Purcell
Committee Chair, Economy and Infrastructure Committee
Parliament of Victoria
Dear Ms Purcell,

Please find enclosed the submission of the National Electrical and Communications Association (NECA) to the Committee's Inquiry into Electricity Supply for Electric Vehicles in Victoria.

NECA is the peak body representing over 6,500 electrical contracting businesses across Australia. Our members are at the coalface of Victoria's energy transition — designing, installing and maintaining EV charging systems, renewable generation, energy efficiency upgrades, and grid connection services.

This submission raises urgent concerns on behalf of the electrical contracting industry. It details the failures of regulation that are enabling monopoly electricity distribution businesses (DNSPs) to distort and hinder markets that would otherwise be advancing innovative and efficient solutions to support the transition to EV's in every market. These actions undermine competition, damage investment, push up costs for consumers and taxpayers, and risk a collapse of confidence in the infrastructure rollout required to support a low-emissions economy.

NECA welcomes the opportunity to provide evidence and policy recommendations. We call on the Committee to support immediate regulatory reform, independent investigation into DNSP conduct, and protection of contestability as a cornerstone of energy infrastructure policy.

Yours sincerely,

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NECA would like to address comments to several items in the terms of reference

(1) strategies to reduce EV charging during periods of peak demand on the grid and increase charging during periods of peak supply;

Strategies for demand management are largely under the oversight of the Australian Energy Market Operator (AEMO) and the Distribution Network Service Providers (DNSPs) as they transition to Distribution System Operator (DSO) models.

Given that most EV charging occurs in residences, significant changes in charging behaviour can be achieved through appropriate tariff and price signals, and demand smoothing via market operation and residential management of Battery Energy Storage Systems (BESS).

To this end - the appropriate regulators, Distribution Network Service Providers, Charge Point Operators, retailers, and prosumers are already well advanced in planning for and delivering on this aspect.

(2) whether public charging infrastructure is being installed at a sufficient rate in different parts of Victoria, including older suburbs where most people do not have access to off-street parking;

In responding to this element of the inquiry, there needs to be a reasonable and informed discussion about what is an appropriate rate for the deployment of public EVCI to support and encourage EV uptake. There also need to be some reflection on which institutions or authorities are most appropriate to plan for and determine the appropriate arrangement and locations for public charging.

NECA and other industry stakeholders have been observing, with some concern, the casual proliferation of false, outdated and/or discredited data to support the mass deployment of kerbside EVCI as an electricity distribution service.

What is the size of the problem or the appropriate rate for deployment?

It is a reasonably subjective topic, for which we look to the work and contributions of genuine experts and thinkers in this field such as Ross De Rango[1] and Andrew Simpson[2]. Both are supporters and advocates for EV adoption.

Andrew's analysis in particular makes the observations

- 'erroneous IEA datapoints have appeared frequently in regulatory submissions as well as public commentary from institutions such as Energy Networks Australia and their selected DNSP members such as Ausgrid. These same errors have then been

[1] https://tinyurl.com/48tzvdju
[2] https://tinyurl.com/mtcpmsc3

unfortunately promulgated by relevant regulatory agencies such as the Australian Energy Regulator and the Australian Energy Market Commission.' And

- 'given the contentious regulatory circumstances surrounding a debate of proposed changes to DNSP ring-fencing rules for public charging, and given that these erroneous datapoints have now been repeatedly debunked by the charging industry itself, any submissions from stakeholders making use of these errors in their rationale should be disqualified and discarded from the debate until more accurate open-source data becomes available to properly recalibrate discussions and decisions.'

NECA are confident with positing that whilst kerbside charging is definitely part of the solution to EV uptake, the urgent mass deployment of monopoly owned equipment is not an effective response. It will subject taxpayers and/or general network customers with additional cost burdens and the very real risk of paying for inefficient and/or stranded assets. Particularly as other technology solutions, such as that described in this article in The Driven[3], make home-charging practical and affordable for many more consumers and temper the demand for public charging.

Public charging infrastructure in Victoria, as in other parts of Australia, is the subject of considerable interest by investors that are willing and able to efficiently deploy and support those services.

The establishment of fast charging facilities, enabling long trips in EV's and convenience charging at specific destinations is well underway. Solutions for existing public spaces are being developed and negotiated with local councils and communities. Older suburbs without off-street parking facilities are attracting the development of kerbside charging solutions including pole mounted units and/or utilising council managed car-parks and other public spaces. Charge sharing platforms are also developing to enable utilisation of private charging facilities when not in use by the primary occupants.

Of significant concern within the Victorian jurisdiction, has been the active frustration of more deployment by the actions of the electricity distribution businesses.

Specifically, NECA are aware of DNSP's in Victoria

- refusing to negotiate in good faith with providers,
- applying excessive fees to assessments of applications and proposed Facilities Access Agreements (FAA's)
- quoting excessive fees for connection design services for CPO applicants
- delaying the progress of others wishing to provide EVCI on or adjacent to DNSP network assets.

evidence of these concerns are apparent in

i. the submissions to the AER consultation for CPU - Ring-fencing Waiver Application – EVCI[4]
    a. Stakeholder quotes[5] –

[3] https://thedriven.io/2025/09/25/nearly-2000-level-1-ev-chargers-to-be-installed-across-australian-strata-communities/
[4] https://tinyurl.com/yc5axe8s
[5] https://tinyurl.com/mr4akxn8

'The assertions that these gaps exist are being made by the very parties who have put up those obstacles to deployment in the first place', and 'I would like to reiterate what was said regarding the barriers, the barriers to deploying EV charging infrastructure in Australia and especially in Victoria is due to the DNSPs themselves…'

b. BP Australia – Submission[6]
'…allowing DNSPs to broaden their role to own and operate EV charging infrastructure will **distract them from the challenges of fulfilling their existing remit** – which they struggle with today. **Indeed, bp pulse has redirected capital to other countries due to our inability to secure grid connections** and rollout infrastructure at our planned rate in Australia.'

c. Evie Network – Submission[7]
'DNSPs present the greatest impediment to the rollout of EV charging infrastructure today, with the major barriers being unpredictable and high-cost connections, and unsustainable tariffs. These barriers are most acute in Victoria, where connection times and cost are often higher than in other states.

d. Tesla – Submission[8]
'If there is a market insufficiency, it lies not in a lack of commercial interest, but rather in DNSP controlled barriers: limited visibility of hosting capacity, delays in connection approvals, and inconsistent or unaffordable access charges. Addressing these root causes through regulatory reform … is where DNSPs can most constructively support EV uptake.'

And,

ii. submissions to the NSW Parliamentary Inquiry into 'Infrastructure for electric and alternative energy source vehicles in NSW'[9]

a. quotes from the transcript of day 1 of public hearings[10]
'Unfortunately, our industry and those efforts have been undermined by a systematic misinformation campaign, led by electricity distributors or DNSPs, in an effort to pressure and mislead policymakers and regulators. DNSPs have falsely asserted the presence of a market failure to meet demand, using already discredited statistics of global infrastructure ratios. They also continue to make vexatious claims that the kerbside EV charging market is not viable commercially, despite evidence to the contrary.'
and
'Monopoly distribution networks are seeking to weaken ring-fencing regulations so that they can own and operate EV charging infrastructure, with guaranteed returns paid by all electricity consumers. For the terminations 2026-31 - September 2025industry, that means our largest

[6] https://tinyurl.com/5hehee9h
[7] https://tinyurl.com/4n3fjzd9
[8] https://tinyurl.com/4h754rwm
[9] https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=3095#tab-members
[10] https://tinyurl.com/bp48y9sc

> suppliers—who already control whether we get a connection, when we get a connection and how much that connection costs, as well as the cost of every kilowatt hour of energy we consume through their poles and wires—will also now become our competitor.'

This has been occurring while those same DNSPs have been calling for a Ring-fencing waiver from the AER, effectively identifying their artificial market failure as a reason to allow them to deploy and own EVCI.

We note that in response to their own consultation processes involving EVCI providers, the Australian Energy Regulator (AER) has flagged an intention to regulate access to DNSP assets by classifying 'a new, negotiated **distribution asset rental service** to support negotiation of access to **Victorian DNSPs' kerbside poles** for that purpose **on terms that are fair, reasonable and cost reflective.**' This intention is articulated in the AER's Draft decision for service classification[11] for the Victorian Distributors published in September 2025.

(3) the best role for electricity distribution businesses in rolling out EV charging infrastructure, and how distribution network tariffs should be set for EV chargers;

The best role for DNSPs in rolling out EVCI is in prompt and efficient

- provision of network capacity/asset data to councils and EVCI providers to assist in planning and scoping assessments, and
- prompt processing of connection applications and Facilities Access Agreements (FAAs) for public EVCI proprietors, particularly where those applications are supported by local council plans and/or approvals.

The DNSPs should not be permitted to occupy a position in which they are in competition with their customers (CPO's), or being able to casually determine that a market failure exists and assume that failure justifies their provision of an EVCI service.

(4) strategies to facilitate the take-up of EV ownership, including the facilitation of bidirectional charging;

The major barriers to a consumers decision to choose an electric vehicle are (broadly)

i. comparative purchase cost of EV's,
ii. availability of suitable models,
iii. range performance/anxiety,
iv. uncertainty about overall cost – repairs/resale value etc
v. the relative convenience of charging vs fuelling for the individual circumstances.

[11] https://tinyurl.com/2eyy3yu3

Of these barriers,

- the first two are declining rapidly as an issue,
- the third is reducing as newer models deliver better battery performance and fast charging public EVCI networks are established,
- the fourth is a longer-term function of the market
- the fifth remains a strong determining factor for those populations without off-street residential or workplace charging availability.

Most Australian residents (in the order of 90%) live in detached or semi-detached housing and have access to some form of off-street parking. Most of those have the ability to undertake at least type 1 charging for their off-street parking, or type 2 charging if they have the appropriate equipment installed. For this cohort, the movement to EV's is likely to progress as EV ownership becomes economically attractive and/or their personal values/preferences lead them to that point.

Many apartment and strata development occupants have off-street parking spaces, but without EVCI included in the building services and/or ability to independently install EVSE to their carspace. At the same time, kerbside charging is often an impractical/even undesirable solution in those areas.

NECA considers that enabling and supporting strata schemes to retrofit and install charging solutions for their occupants is a key strategy to enabling this section of the population into EV ownership. Programs such as the NSW government 'EV Ready Building Grants' and funding for the trial of newer technologies such as the ARENA grant for Level 1 Intelligent Power Sockets (IPS)[12] are important enablers for widespread up-take of EV's in existing apartment stock.

Technologies such as NOXEnergy solution, in particular, have the potential to reduce the cost of extending home charging to many thousands of residents that would otherwise dismiss the concept of owning an EV on the basis of relative convenience alone.

(7) any other related matters the Committee considers relevant.

Consumer Protections and Charging Transparency

The viability of EV adoption does require reliable publicly accessible infrastructure. Early commentary about the implementation has highlighted problems of

- coverage
- charging rates (kw)
- limited or restricted payment options (eg bespoke apps)
- reliability of the charging units and/or payment methods
- ICE'ing or other blocking if dedicated charging bays are not defined
- Overstaying if time limits are not enforced or (preferably) incentivised by standing charges

[12] https://autotalk.com.au/industry-news/nox-energy-secures-1-51m-arena-grant-ev-charging-rollout

The provider of EVCI are rapidly overcoming these problems and providing appropriate solutions to local planning authorities. The Victorian government should support this process by identifying planning guides for local councils for EVCI, and minimum standards for transparency, utility and service reliability while preserving the flexibility of a market-led model. Work has already been undertaken to produce this outcome at the federal level with the consultation and development of initiatives such as the 'Minimum operating standards for government-supported public electric vehicle charging infrastructure'[13]

Fire protection treatment of EV charging in existing strata buildings

The advice and position provided by fire protection authorities with respect to the installation of Ev chargers in existing strata buildings and particularly covered parking lots is discouraging investment and adding often unnecessary compliance costs to those installations. In particular, the position taken to deem such locations as special hazard locations by the Australasian Fire and Emergency Service Authorities Council (AFAC),[14] and adopted by jurisdictional fire authorities is an additional barrier to the installation of enabling facilities for EV's in existing buildings

Without dismissing the need to appropriately plan for emergencies and risk in the built environment, NECA suggests that the data with respect to EV fires (to date) is that the perception of increased risk during charging is not supported. Consultation with AFAC and the local authorities should take place to identify strategies that do not identify EV charging bays in this special hazard category of the NCC, but do deliver planning outcomes appropriate to the risk.

Recommendations

NECA recommends the following initiatives to the committee,

1. Address the barriers to the deployment of EVCI presented by DNSP's
    a. support the suitable regulation of Victorian DNSPs in providing timely assessments and connections to EVCI, especially when associated with council approved projects.
    This could be done via the Victorian DNSP license conditions specified by the relevant minister.
    b. articulate support for the AER's Draft decision for service classification to regulate access to DNSP poles for EV infrastructure providers on terms that are fair, reasonable and cost reflective.
2. Ensure local councils remain the primary agencies for determining location and solutions best suited to the public spaces they manage. Establish assistance to local councils with EVCI planning processes, to identify reasoned infrastructure needs and planning guidance.
3. Recommend minimum operating/performance Standards for publicly accessible EVCI located on public land to be adopted in policies/approvals by local councils to manage EVCI providers.

[13] https://www.dcceew.gov.au/sites/default/files/documents/minimum-operating-standards-electric-vehicles-charging-infrastructure.pdf
[14] https://tinyurl.com/5a5sav2z