

National Electric Vehicle Strategy Action Plan Implementation Group
Transport Policy team
Emissions Reduction Division | Land and Transport Branch
Department of Climate Change, Energy, the Environment and Water

Submitted via email to: - NEVS@dcceew.gov.au

4 July 2025

Review of the minimum operating standards for government-supported public electric vehicle charging infrastructure

To whom it may concern,

NECA is the peak body for Australia's electrical and communications industry, which employs 344,370 people and turns over more than \$82bn annually. NECA represents over 6,500 businesses performing works including the design, installation, and maintenance of electrical and electronic equipment in the construction, mining, air conditioning, refrigeration, manufacturing, communications, security, automation, and renewable energy sectors.

NECA has advocated on behalf of the electrotechnology industry for over 100 years and helps its members and industry operate in an efficient, safe, and regulatorily compliant manner. NECA represents the interests of electrical and communication businesses to all levels of government and in regulatory, legislative and industry development forums. It is also a foundation member of the Australian Chamber of Commerce and Industry (ACCI). Many of our members provide the electrical design, construction and project management services to deliver Electric Vehicle Charging Infrastructure (EVCI) in all contexts.

With respect to this particular review, NECA called on the members of our recently formed Electric Vehicle Committee to review the Minimum Operating Standards document and form the feedback below from their experience and knowledge of the issues. Noting that in some instances we have declined to comment on the basis that we consider other stakeholders are better placed to do so and/or NECA has a neutral view. This

committee is comprised of representatives from our member organisations that actively participate in EVCI and our own technical and policy advisors.

Responses to questions:

1. Has there been any technological or regulatory progress that demonstrates the need for changes to the number of charging ports standard?

NECA notes that setting ‘one size fits all’ requirements is not useful. There will be cases where the number of charging points specified is too low, and cases where it is too high.

Flexibility should be available in government funded programs to accommodate a needs based assessment of sites to qualify for finding.

2. Has there been technological or regulatory progress that warrants the need to reconsider connector type standards?

No.

3. Has there been technological or regulatory progress that demonstrates a need to reconsider uptime requirements?

Uptime requirements should be considered at a site level, rather than being limited to a plug level.

A site with a large number of bays, with one plug out of action for a period of time while awaiting maintenance, is acceptable.

NECA suggests that a site should be considered ‘up’ if 75% or more of the plugs at the site are in working order.

Measuring uptime of individual plugs may be a useful metric as well, but is not an appropriate measure on it’s own of the utility being provided to consumers.

4. What are your views on including a standard to support compliance of uptime percentages and public reporting of data?

NECA does *not* support mandated data sharing obligations, particularly those concerning commercial or customer information.

Any data sharing obligations imposed should closely consider the implications on the correct functioning of a competitive free market, and should be co-developed with industry.

5. What are your views on requiring CPOs to provide EV charging infrastructure maintenance information?

No comment

6. Could you provide information on the current state and future outlook of EV roaming and Plug & Charge in Australia, including your views on what role the standards could play to further support these?

Efforts by DNSPs to insert themselves into a position where they exercise governance over EV roaming¹, and efforts by various parties to establish a new monopoly layer performing this function, should be opposed by government.

The competitive rollout of EV roaming in Europe has led to poor consumer outcomes, which regulation is only just catching up with now². It would be exceptionally naïve to assume that applying a model for EV roaming that removes competition from a new layer in the EV ecosystem would deliver good outcomes for Australians.

Were this layer to be controlled by the existing, entrenched monopoly that is already delaying and obstructing the rollout of public EV charging, while seeking to change the ringfencing rules in a way that will further damage the competitive rollout of public EV charging infrastructure, the outcomes for consumers could reasonably be expected to be very bad indeed.

The right move for government on this question is to protect consumers first, before accelerating the introduction of technologies like roaming, which we do not have any urgent need for.

Close consideration of AFIR article 5 out of the EU, and consideration as to how that might be implemented at state level to protect against the potential harms from roaming (whether it's competitively led or monopoly dominated), is warranted.

7. Do you have any suggested changes to the pricing standard to better reflect what is currently possible with existing technologies?

Pricing structures should be allowed to include concepts like dwell time, overstay charges, and flagfall (ie, cents per minute, and cents per session), in addition to the cost of energy (cents per kWh) to ensure drivers are permitted to be provided price signals that will incentivise socially good behaviour.

¹ <https://www.parliament.nsw.gov.au/ladocs/submissions/90047/Submission%2075%20-%20enX%20Consulting.pdf>

² <https://www.autoritedelaconcurrence.fr/en/press-release/charging-stations-electric-vehicles-autorite-issues-its-opinion-competitive>

NECA does not have a comment to make with respect to specific price setting, that's a free market function.

8. Has there been technological or regulatory progress that demonstrates a need to reconsider pricing requirements?

No, the pricing structure originally proposed in the MOS was simply flawed.

9. Could you provide information on the current state and future outlook of time-of-use and dynamic pricing for EV charging in Australia?

No comment

10. Has there been technological or regulatory progress that demonstrates a need for additional data specifications, such as live pricing data into the future?

No comment.

11. Are there any customer service improvements that should be considered to better support users and help maintain customer satisfaction?

No comment.

12. Do you consider OCPP2.1 a preferable standard compared to OCPP 2.0.1?

No comment

13. Are there updates to any other Communications & Security Standards that should be considered?

No comment

14. Is there a need to update the accessibility standard, including to consider further requirements for 'drive-through' charging bays and providing adequate shelter at EV charging sites?

Setting requirements for all sites to have drive-through bays would mitigate against government supporting a wide variety of useful sites where supporting drive-through bays would not be practicable and/or potentially contribute to poor site designs in an effort to qualify.

Beyond this, NECA leaves consideration of accessibility matters to others.

15. Is there a need to update the personal safety standard, including to consider requiring emergency call buttons?

Emergency call buttons and stop mechanisms are not considered necessary and should not be mandated in all instances.

Emergency stop buttons are a feature of petrol stations, because in those settings humans are pumping hundreds of litres of liquid fuels into open-topped tanks, which creates explosive vapour clouds around their legs. This is the normal and expected outcome, every time a person fills their car. The e-stop is there so that anyone can stop the pumps delivering more fuel into a fire, should those vapour clouds ignite.

EV charging is, by comparison, safe. The case for requiring an e-stop has not been made or justified with any evidence.

Emergency call buttons are a feature of environments where serious personal risk or a serious environmental hazard is expected. Duress buttons under the counter at banks, used in the case of a holdup, are one example. Break-glass alarms in industrial facilities managing flammable chemicals are another.

Again, EV charging is, by comparison, safe. We don't require emergency call buttons in council car parks; we should not require them for EV charging.

16. Please provide information on the current state and outlook of emerging charging technologies in Australia.

No comment other than to make the observation that there is a healthy community of providers and innovators working on and developing technologies and consumer focussed interfaces to meet the needs of the various market sub-sectors for EVCI.

17. Has there been technological or regulatory progress that warrants the need to include new charging technologies in the Minimum Operating Standards?

No comment.

18. What are your views on including a dedicated cybersecurity guideline in the Minimum Operating Standards? What should this guideline cover?

No comment.

NECA appreciate the opportunity to provide this feedback and contribute to the development of effective and productive policies to ensure government supported EVCI meets the needs of the community. To arrange NECA's further input, or should you wish to discuss any matter relating to the issues raised, please contact Mr Kent Johns, Head of Government Relations and Policy, kent.johns@neca.asn.au.

Yours faithfully,



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