Submission to the Australian Energy Regulator – Ring-fencing waiver – EV charging infrastructure

June 2025

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Support for more EV charging infrastructure

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3. RACV supports the need for a national regulatory framework to support a level playing field. The framework should include:
    - Clear and transparent third-party access guidelines and connection process including non-regulated fees;
    - Timely approvals for third party access requests or expedited pathways; and
    - Accelerating the development of innovative tariffs to recognise the unique load characteristics of EV charging and battery systems. There is a need for time-varying or dynamic pricing aligned with network constraints.
4. Before any changes to the regulatory framework are made, the Australian Energy Regulator should assess the most efficient and equitable model which puts the consumer first including a focus on the consumer charging experience; dedicated accessible car parking and enhanced consumer protections.
5. Update regulations to anticipate future technological innovation and enhancement given the increase in consumer energy resources. It is essential that the regulations are aligned with the capabilities of modern energy storage systems to facilitate their adoption and use.

About RACV

RACV welcomes the opportunity to respond to the Australian Energy Regulator's consultation on the ring-fencing waiver application for an EV charging infrastructure trial from CitiPower, Powercor and United Energy.

Representing over 2.3 million members and an additional 500,000 customers, RACV exists to improve lives in the areas of home, cleaner energy, motoring, mobility and leisure.

RACV is committed to helping Australians transition to a cleaner energy future. We offer cleaner energy products and services including solar panels and batteries through RACV Solar. RACV Solar is now one of the largest installers of solar power, both commercial and residential, on the east coast of Australia and is one of the largest installers of home batteries in Victoria.

RACV is an electric vehicle charger network operator with locations at RACV Clubs and resorts and public locations across Victoria. In 2025, a comprehensive upgrade was completed to enhance speed and reliability. Each RACV charging site also features CCTV security cameras to provide a safer environment for members and customers while charging their EV and help prevent vandalism.

RACV has also invested in electric vehicle charging companies JET Charge and Chargefox. Our team of electricians, engineers and project managers design, install and support commercial and residential EV charging infrastructure and provide integrated energy solutions for homeowners, fleet operators and businesses.

RACV delivers expert and tailored commercial energy solutions to help businesses save on energy costs, improve energy resiliency and reliability, reach renewable energy goals, unlock additional revenue streams and maximise return on assets through the energy markets.

Key services include commercial solar, battery storage, EV chargers, renewable energy roadmaps and system operation and maintenance.

This year RACV launched a new product for commercial and industrial customers following our successful installation of one of Australia's first Virtual Power Plant (VPP) of its kind at RACV's Torquay and Inverloch resorts. RACV's own VPP is one of the first to participate in the very-fast Frequency Control Ancillary Services (FCAS) market managed by the energy market operator. This followed the ARENA-supported AEMO VPP Demonstration Project in 2022.

By installing VPPs at our resorts, we have been able to realise a range of commercial benefits such as managing energy costs and generating revenue, at the same time as contributing to grid stability by feeding energy back into the grid during periods of high demand. Delivered in collaboration with PowerSync Technologies, the VPPs aggregate over one megawatt of battery capacity from the Torquay and Inverloch resorts – the storage equivalent of approximately 20 average electric vehicle batteries.

Support for more EV charging infrastructure

RACV supports measures and incentives to accelerate the uptake of zero and low emission vehicles that deliver improved affordability and consumer choice.

According to research conducted by RACV in 2024, of those surveyed, one in four are likely to buy an electric vehicle (EV) in the next 12 months (higher for 25–44-year-olds and those on higher incomes). Forty-nine per cent were unlikely to buy an EV in the next 12 months.

Some of the barriers to purchasing an EV identified included not enough charging stations/reliability of charging network (34%), limited battery capacity (30%), and hassles with charging the battery (27%).

Nearly one third (26%) of those surveyed do not have access to private, off-street parking to charge an EV at home.

There is a need for a significant expansion and variety of different types of infrastructure to support the uptake of EVs, including kerbside charging.

Increasing the availability of public charging options will give Australians confidence their next vehicle purchase can be an EV.

National leadership

RACV is a member of the Australian Automobile Association (AAA), the nation's peak motoring body.

RACV supports the AAA's call for the Federal Government to continue to take a leadership role in the strategic planning of a national network of charging infrastructure and planning and management of the Australian electricity grid to support EV charging infrastructure.

If consumers do not feel confident in the resources, systems and infrastructure required to support transition to EVs, things like charging facilities, the stability of the electricity grid and the availability of skilled service and repair technicians, there is a real risk that this will slow the rate of consumer uptake of EVs.

This critical infrastructure should be planned and funded under the land transport infrastructure funding arrangements and national land transport infrastructure plan within the infrastructure portfolio. The AAA and Clubs have called for a national approach to road-user charging which, as a first step, brings zero and low-emission vehicles (ZLEVs) into the road-user charging system, without disincentivising their take-up, using the already legislated NSW model as the starting point.

Revenue collected through a road-user charge on zero and low-emission vehicles should be directed to land transport infrastructure funding (including for EV charging in locations where return on investment is insufficient to be serviced by commercial providers alone).

In addition, the Australian Government, in collaboration with all States and Territories, developed a national mapping tool[1] and data provision to support effective deployment and use of EV charging infrastructure.

The tool delivers on the objectives of the National Electric Vehicle Strategy[2] to guide optimal investment and support improved coordination and planning of charging infrastructure across Australia. One of the key objectives is to improve coordination of public and private sector investment and support long term planning.

There is a lack of real-time Distribution Network Service Providers (DNSP) data on local network capacity, congestion, and constraints. RACV supports the need for improved data transparency and sharing through regulatory channels. This will improve coordination and planning for Battery Energy Storage Systems (BESS) deployment and EV charging infrastructure, including kerbside charging.

The AAA also publishes the EV Index[3], a tracking tool to monitor the adoption and progression of EVs and alternative fuel types in Australia over time. The EV Index includes a breakdown of all light vehicle registrations in Australia by key fuel types and postcodes.

A high number of current EV registrations should not be the only criteria considered when determining the location of kerbside charging locations. Access to other public charging infrastructure and the composition of the housing stock (eg, houses, townhouses and apartments) in each location should also be considered. Home solar systems enable EV owners to charge their vehicles using self-generated electricity, reducing their reliance on the grid. When selecting kerbside charging locations, priority should also be given to areas where barriers to home solar and/or EV charging exist – such as housing stock that lacks off-street parking or is otherwise unsuitable for private charging infrastructure.

[1] https://evciroadmap.evenergi.com/
[2] https://www.dcceew.gov.au/sites/default/files/documents/national-electric-vehicle-strategy.pdf
[3] https://www.aaa.asn.au/research-data/electric-vehicle/

Recommendations

1. The Federal Government should continue to lead the strategic planning of a national network of charging infrastructure and the planning and management of the Australian electricity grid to support EV charging infrastructure.
2. There is a lack of real-time Distribution Network Service Providers (DNSP) data on local network capacity, congestion, and constraints. RACV supports the need for improved data transparency and sharing through regulatory channels. This will improve coordination and planning for Battery Energy Storage Systems (BESS) deployment and EV charging infrastructure, including kerbside charging.

Consistency and transparency

The NSW Government launched its first round of funding for kerbside EV charging in 2023. NSW's Destination charging grants has shown that competitive neutrality can be maintained while accelerating the rollout. An additional 671 public kerbside EV chargers will be installed following a further $4.1million NSW Government investment in 2024. This will be matched by $8 million in private investment. The expansion of the program clearly shows concerns around demand management, the impact of new technology on the network, connection guidelines and customer charging behaviour have been mitigated.

In 2023, the Victorian Government also announced $2.2 million across four projects to develop new charging technology as part of the Zero Emissions Vehicle Emerging Technology (ZEVET) program. As part of this investment, 100 pole-mounted EV chargers would be installed across three inner city local government areas.

As at May 2025, none have been installed in Victoria.

RACV is aware of a number of kerbside charging companies who are willing to invest and expand into Victoria. This includes local governments looking for innovative solutions to expand public EV charging infrastructure options for ratepayers without off-street parking. Approval and access delays and a lack of clear and consistent guidelines from the DNSP's has prevented the acceleration of kerbside EV charging installations in Victoria and therefore delayed any network learnings that could have come from Victorian Government investment over the past two years. Private investment, competition and innovation should be encouraged and prioritised.

Noting Australian Competition and Consumer Commission's role in setting the legal right for third parties to gain access to certain infrastructure services with reasonable terms and conditions. The ACCC aims to protect consumers and increase competition to ensure lower prices, and a wider variety of products and services to choose from. For example, the ACCC mandates access to Telstra's local network by competitors for effective communications in the long-term interests of customers. This creates a level-playing for the market to respond.

Recommendation

3. RACV supports the need for a national regulatory framework to support a level playing field. The framework should include:
   - Clear and transparent third-party access guidelines and connection process including non-regulated fees;
   - Timely approvals for third party access requests or expedited pathways; and
   - Accelerating the development of innovative tariffs to recognise the unique load characteristics of EV charging and battery systems. There is a need for time-varying or dynamic pricing aligned with network constraints.

Consumer first

Australia's energy transition is fast paced with changing policy and regulatory frameworks which will only accelerate as new technology and innovation emerges.

Rapid technology improvements and an ongoing fall in costs will pave the way for smarter home charging and electrification solutions (including Vehicle-to-Home and Vehicle-to-Grid).

The regulatory framework needs to put consumers first.

Whilst the economies of scale and scope can, at a high level, benefit consumers, there are a number of other considerations including:

- A focus on the consumer charging experience including responsiveness to ongoing and regular maintenance of the chargers and interoperability.
- Dedicated accessible car parking to increase availability, usage and improve access for people with disabilities. Community consultation to address local community needs is critical including the reallocation of public parking.
- Pricing – cost shifting depending on tariff structures and the risk any changes to costs are passed on to the consumer.
- Consumer protections from monopolistic behaviour.

Recommendations

4. Before any changes to the regulatory framework are made, the Australian Energy Regulator should assess the most efficient and equitable model which puts the consumer first including a focus on the consumer charging experience; dedicated accessible car parking and enhanced consumer protections.
5. Update regulations to anticipate future technological innovation and enhancement given the increase in consumer energy resources. It is essential that the regulations are aligned with the capabilities of modern energy storage systems to facilitate their adoption and use.