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## ENA Response to EVSE standing data register – Consultation Paper

Energy Networks Australia (ENA) welcomes the opportunity to provide input to the ESBs Electric Vehicle Supply Equipment (EVSE) standing data register consultation paper.

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA and our members believe this to be one of the critical areas of reform that will help enable the smooth and rapid uptake of Electric Vehicles (EV) in the near future.

### Key messages

- » EVSE data is critical to the effective and efficient integration of EVs. The ENA supports the ESB in exploring the key issues
- » ENA supports an expanded role for the existing DER Register and not a new, unique database for EVSE data.
- » Compliance requires further consideration as it will determine success or failure of these initiatives
  - The quality and accuracy of the data is more important than how the data is stored. Any design that does not consider incentives for compliance has a low probability of success.
  - Compliance has both operational impacts for the safety of the electricity network and for long-term network planning.
- » There is an assumption that networks will have access to smart meter data. In practice this is unlikely to be the case with the current state of metering contestability.

## Data is a critical area of reform

Data is a critical area of reform and we commend the ESB for their efforts in helping to build the foundational requirements of the future energy system.

Data in the context of EVs is especially important as EVs have a large potential impact on the electricity system as both a load and source. It is vital that planners of the power system have a much better understanding of uptake so that we ensure a smooth transition for all customers in the future.

The first step forward is to establish a fit for purpose, workable, and customer friendly framework that encourages customers, registered car owners and installers to provide the EVSE data needed to maintain network security.

## The existing DER Register should be used

The existing AEMO DER Register should be expanded to accommodate additional information on EVSE assets together with the introduction of obligations on customers, registered car owners and installers to provide DNSPs with EVSE data. We do not support the creation of a new repository of data specific to EV supply equipment.

The AEMO DER Register was created in 2020 to capture information on all DER devices to help AEMO (and other power system operators) plan and operate the network. There is nothing to distinguish EVSE assets from other types of DER to justify a stand-alone solution.

The advantage of this approach is that it minimises costs by leveraging existing methods to access the DER Register. The approach provides all of the benefits of a stand-alone solution and reducing duplication.

## Compliance must be considered for effective reform

The quality of the data captured plays an important role along with how the data is stored or administered. Ensuring that there are appropriate measures (incentives or penalties) to produce high accuracy EVSE standing data is critical and further work is needed.

The ESB is well positioned to determine what roles different stakeholders can play to ensure the DER Register is filled with accurate EVSE data. Jurisdictional regulators and other bodies will need to play an important role in providing effective mechanisms and compliance requirements on customers, registered car owners and installers to provide DNSPs with accurate EVSE data.

While the consultation paper does not explicitly raise compliance issues, this is vital to supporting successful long-term reform. We would strongly support further work from the ESB on this topic.

As noted in the paper, high accuracy data is vital for successful outcomes in network safety, planning and operation. To achieve this, it is critically important to get the right combination of incentives and fit for purpose jurisdictional arrangements in place to achieve good compliance across the market. The ESB is well placed to facilitate reform here.

## Smart meter data availability should not be assumed

The consultation paper assumes that networks will have access to smart meter data, however this is contingent on the development of a power quality data access and exchange framework that enables DNSPs' access.

The AEMC metering review is currently finalising its recommendations and ENA has key concerns<sup>1</sup> with the Commission's draft proposal to rely on commercial negotiations between DNSPs and metering coordinators (MC) to determine a price given the monopolistic price setting power that the MCs will possess.

Unless this is addressed as an outcome of the metering services review, it will likely lead to higher prices for electricity customers in the longer term.

If you have any questions or would like to discuss specific topics further, please do not hesitate to contact Dor Son Tan, Head of Distribution [dstan@energynetworks.com.au](mailto:dstan@energynetworks.com.au).

Yours sincerely,



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<sup>1</sup> <https://www.energynetworks.com.au/resources/submissions/2023-submissions/ena-response-review-of-the-regulatory-framework-for-metering-services-draft-report/>