



Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235
via email: aemc@aemc.gov.au

Dear AEMC

RE: Retail Energy Competition Review – Electric Vehicles

Thanks for speaking with me at the JET Charge offices in person, so that I can relay an EV charging infrastructure business' views on the Retail Energy Competition Review (**Review**).

As you made me aware, you would only be able to take my comments into account if I also submitted a written response.

As such, please see my brief written responses to your questions below, to be supplemented by the comments I made in person during your visit.

Should you have any questions, please contact me on 0403 833 495 or tim@jetcharge.com.au.

A handwritten signature in black ink, appearing to be "Tim Washington", written over a horizontal line.

Regards

Tim Washington
Director
JET Charge

Question 1: Context

Are there any other contextual developments the Commission should consider in relation to EV uptake and use in Australia?

Whilst a lot of work has been done to contextualise the rate of EV uptake in Australia, not as much work has been done on the uptake of EV charging, and the importance of infrastructure build out to support the uptake of EVs.

Even less work has been done to analyse what other countries have done from a grid readiness perspective to prepare the energy sector for EVs.

I would encourage the AEMC to seek data from those entities that actually have it in Australia – being JET Charge, and perhaps even more importantly, from charging network Chargefox, so that you can make more accurate recommendations to the market.

Question 2: Role of retailer

What challenges and opportunities, given the current role of retailers in the NEM, are EVs likely to provide retailers?

The challenges from a retail (rather than network, transmission or generation) perspective relates mostly to how retailers can best deliver electricity at the cheapest price to consumers. Conversely, this is also the biggest opportunity, which will be captured by the most progressive retailers.

Given that EVs are parked for large periods of time, and EV charging on a daily basis only takes up a fraction of that time, there is significant scope for retailers to alter the time of charging based on NEM pricing, internal hedging policies, internal generation asset performance etc, or a combination of all of those things. This is not the case for most other assets that require electricity. EVs are unique in this way.

One interesting aspect of EVs is that they serve as the intersection point between automotive and electricity, which means that the current retailers on the NEM won't be the only ones looking to capture the value derived from EV customers. We will see car manufacturers, like VW with their Elli arm, enter the retail space. We will also see traditional fossil fuel retailers, like Shell, enter the electricity market with EV specific plans.

These new entrants are a huge challenge for current retailers.

Question 3: Regulatory environment

- a. Do you consider that regulatory changes, like multiple trading relationships, that improve a consumer's ability to engage with multiple FRMPs at a household would enable innovative services and products to develop for EV consumers?**

Yes. I believe having multiple trading relationships would allow both new and existing retailers to innovate plans to deliver the cheapest possible fuel for EV drivers, free of the burden of existing pricing structures.

I believe it would increase current retailer competitiveness for a household, and allow the many innovators within existing NEM retailers to test out new strategies. At the same time, I think it reduces the barriers to entry for new, asset specific, retailers to enter the market.

Most importantly, it gives EV drivers the best possible choice for their charging needs, whether it be driven by economics, the delivery of green power, or some other factor.

- b. Do you have any views on an appropriate method (e.g. through a change to the SGA framework or an alternative metering configuration), and relevant costs, to facilitate this?**

No.

Question 4: Residential charging

- a. Are there other offers in the retail market, or are you developing any others, aimed at EV consumers?**

We are working with current NEM retailers to develop EV specific offers. There are already EV specific offers in the market.

- b. Are there retail market barriers in developing residential products and services for EV consumers?**

At this stage, no retailer can develop products specifically for EV charging. This means there can't be programs tailored for the different aspects of EV charging, such as:

- Multi site EV charging profiles + plans/bundles
- V2G
- Off peak only charging plans without moving to ToU tariff

Question 5: Non-residential charging

- a. Are you providing or developing any non-residential charging products or services?**

Yes. JET Charge is a part owner of Chargefox, which owns and operates commercial and public EV charging stations.

- b. Are there retail market barriers in developing non-residential EV charging products and services?**

Not really if we only consider the retail portion of the equation.

Question 6: EV value streams

- a. Are you currently developing products and services to harness EV value streams?**

Yes. We are working with existing retailers to harness EV value streams.

- b. Are there retail regulatory barriers for retailers or new energy service providers accessing these value streams?**

Certainly, without any rule changes, current regulatory barriers force both existing and new retail service providers in offering a "one size fits all" approach when it comes to the provision of electricity for EVs.

However, given that EVs have similar consumption loads to many single dwelling homes, and the fact that they can return power back to the home or grid, and offer many additional services, we think it's a wasted opportunity for all retailers, including existing retailers, that they can't offer plans specific for EVs. More importantly, it's a wasted opportunity to deliver the cheapest and greenest form of electricity to consumers.