

April 2025

Via email: AERexemptions@aer.gov.au

Regarding: [Review of the exemptions framework for embedded networks](#)

Introduction

The Electric Vehicle Council (EVC) is the national body representing the electric vehicle industry in Australia. As the market is emerging in Australia, our work is particularly aimed at increasing certainty for investment through policy, knowledge sharing and education.

The Australian Energy Regulator (AER) is the national regulator for electricity and gas supply in Australia. The AER has responsibility for regulation of energy networks, protecting the interests of consumers through the enforcement of the National Energy Retail Law.

The Review

The EVC acknowledges that it has been heard in the consultations leading up to the publication of this draft decision.¹ If the final decision is published similarly to what is outlined in the draft, it is our assessment that EV charging will continue to be possible in embedded network settings at the residential level such as apartment buildings and at the commercial level such as in shopping centres, commercial precincts etc.

It also appears that EV charging will remain possible at holiday lets, caravan parks and the like, as an additional service secondary to the main service being provided and that those providing the service will be eligible for a network exemption.

Future consultations and rule changes

The EVC will continue to advocate for proponents of EV charging stations within embedded networks to be afforded access to the competitive retail market to ensure charging prices are kept low and equitable allocation of extra charges such as demand or

¹ [EVC response to the Review of the AER exemptions framework for embedded networks - Electric Vehicle Council](#)
[EVC Response to EPWA Regulating the sale and supply of electricity in embedded networks - Electric Vehicle Council](#)
[EVC response to the AEMC Draft determination – Unlocking CER benefits through flexible trading - Electric Vehicle Council](#)

capacity charges go to those that incur them. This is currently not always the case as some embedded network owners are writing into the contract that Charge Point Operators (CPOs) use the embedded network as their energy supplier.

The EVC will also continue to advocate for embedded networks to remain an option for new residential builds, with appropriate guard rails, to enable easy and low-cost installation of EV Supply Equipment (EVSE) in the building carparks, where energy for the EV can be billed to the EV owner.

If you have any questions on this submission, please contact Michael, at office@evc.org.au.

Thank you for your consideration of our submission.

Yours sincerely,

Michael Shaughnessy

EV infrastructure officer

Electric Vehicle Council