September, 2025

DCCEEW

Via website: National Consumer Energy Resources (CER) Roadmap - Consultation on technical priorities - Department of Climate Change, Energy, Environment and Water Report template

National Technical Regulatory Framework Draft Prototype

Introduction

The Electric Vehicle Council (EVC) welcomes the opportunity to provide feedback on the draft prototype of the National Technical Regulatory Framework. We support the intent to ensure consumer energy resources (CER) are safe, secure, and interoperable, to support a renewable future.

Much good work has been done here but appears to pertain mostly to solar and battery inverters. Electric vehicles have been established through the CER Roadmap as a fundamental CER component and its related technologies need to be considered comprehensively in all technical regulatory reviews. Electric Vehicle Supply Equipment (EVSE) and specifically bidirectional EVSE should not be treated in the same manner as battery inverters given their use case, behaviours and market arrangements will be inherently different. Given also that at least three bidirectional inverters will be fully certified and available for sale in the next few months, special accommodation is warranted.

Consumers will need to be able to charge their vehicles as per their expectations.

Concerns with Proposed Framework Elements

The EVC is concerned that the roadmap is being shaped under the assumption that all CER will eventually be visible and orchestrated as a default. This is neither realistic nor necessary.

Not all CER needs to be visible or centrally coordinated. A more effective and consumer-centric approach would be to encourage participation through well-designed incentives and pricing structures, rather than relying on mandates. This approach respects consumer autonomy, encourages innovation, limits impact of cybersecurity breaches and supports system security without imposing unnecessary burdens.

1. Certification of Imported Devices (Page 14, Box 2)

The proposal to require a "prescribed list of CER devices [that] must be certified (…) to be imported, sold, installed and connected across Australia" raises significant practical concerns. Australia already manages electrical safety through supplier registration, conformity assessment, RCM labelling, and post market surveillance by state or territory regulators, and the ACCC. A border pre-approval list would be very expensive to run, hard to police across millions of consignments, and risky in terms of delays, higher prices, and supply constraints. A key pillar of good policy is enforceability. This proposal risks creating a regulatory framework that is both expensive and ineffective.

For example, the NSW government has introduced new product safety standards for lithium-ion e-micromobility devices (e-bikes/e-scooters)[1], enforced at sale with significant penalties. The policy aim, which is to reduce fires from substandard batteries, is pursued through standards enforcement, not border control.

2. Installer Accreditation for EVSE (Page 14, Box 3)

The suggestion that installers should be accredited to install electric vehicle supply equipment (EVSE) is unnecessary. Mode 3 EVSE are relatively simple to install, often using standard electrical practices. As are power points and smart power points (eg. Alchemy charge, NOX, Powerlog & ReadySteady Plug) that supply Mode 2 in-cable control and protection devices (IC-CPD). Licenced electricians have been carrying this out safely and effectively in Australia for decades. Communications are typically over Wi-Fi, and setup is straightforward. Requiring additional training or accreditation would drive up costs without delivering meaningful safety or performance benefits.

3. Maintenance and Upgrade Register (Page 14, Box 4)

Periodic maintenance of EVSE is recommended to ensure the ongoing correct and safe performance of the device. When an EVSE is upgraded or replaced, the performance that the customer and then the network expects should be retained.

Requiring actors to update a register every time a device is maintained or upgraded is unlikely to be effective. This would be difficult to police and would likely result in an incomplete and unreliable dataset.

Maintenance including an alteration to the electrical side of an EVSE or bidirectional EVSE installation should be captured in state electrical safety certificates. This information can be harvested and copied across to a DER register or equivalent.

Consumer-Centric Regulation (Page 16)

To ensure regulatory decisions are truly consumer-centric, governance structures should explicitly require that all decisions demonstrate a net benefit to consumers. This includes avoiding mandates that dictate how consumers must use their CER. Instead, regulators should focus on enabling participation through incentives, education, and pricing signals.

[1] https://www.nsw.gov.au/housing-and-construction/safety-home/electrical-safety/lithium-ion-battery-safety/new-standards-for-lithium-ion-batteries-e-micromobility-devices

Modulation Requirements for EVSE

The draft suggests that all devices, including EVSE, must be capable of modulating power in response to external signals. This is not appropriate for all EVSE. While some consumers may choose to engage with the market in this way—using OCPP compatible chargers—EVs are fundamentally transport assets, not just energy resources. Consumers expect their vehicles to be charged when needed, and mandatory modulation could undermine confidence in EV charging.

Moreover, consumers can easily bypass such requirements by plugging chargers into a power point. This can be done with chargers up to 22kW with the right power point. This highlights the futility of imposing rigid mandates. A better approach is to encourage desirable behaviours through well-structured time-of-use (ToU) tariffs and incentives to engage with market participation options such as Virtual Power Plants (VPPs) and Home Energy Management Systems (HEMS).

Requiring all Mode 3 EVSE to respond to external signals would add unnecessary cost. With appropriate pricing signals in place, consumers can manage charging themselves using vehicle apps, timers, or manual controls.

Conclusion

The EVC strongly recommends that EVSE be excluded from any mandatory accreditation, orchestration or modulation requirements. The focus should be on;

- enabling consumer choice,
- supporting innovation, and
- using pricing and incentives to drive beneficial behaviours.

A flexible, consumer-led approach will deliver better outcomes for the energy system and support the continued growth of electric vehicles in Australia.

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,

Dr. Alina Dini

Electric Vehicle Council