

Reforming Australia's Measurement Legislation: Consultation Regulation Impact Statement



The Electric Vehicle Council (EVC) is the peak body representing the electric vehicle industry in Australia. Our members include companies involved in providing, powering, and supporting electric vehicles.

We welcome the opportunity to make this submission to the consultation Regulation Impact Statement (RIS) developed as part of the Measurement Law Review. This review is timely given the existing measurement regulatory framework is not fit-for-purpose for public electric vehicle charging.

The rollout of electric vehicle charging infrastructure is critical to supporting and encouraging electric vehicle uptake. There has already been significant public and private investment in charging infrastructure, however much more is still required.

EVC members recognise the need for adequate consumer protections and trust when it comes to public EV charging sessions. The consumer experience is paramount to accelerating EV uptake in Australia.

However, Australia is a technology taker in this industry. We import all of the AC EV charging equipment available in Australia, and we represent a very small segment of the global market. This means we are dependent on international standards and charging equipment design. Any requirements for Australian equipment need to be consistent with international standards and manufacturing practices.

With regards to measurement, there is a difference in regulatory treatment of AC chargers and DC chargers so we have made this distinction below.

AC metering requirements

Most EV charging sessions are conducted in individual homes. However, a significant portion of charging sessions occurs in circumstances which may fall within the realm of measurement legislation, such as:

- via public AC charging stations where users pay for a given amount of energy measured in kWh in a charging session; or
- in an apartment complex where, for example, an owners' corporation may sub-bill apartment owners for use of this equipment based off kWh per session.

These are just two examples; there are likely to be more.

However, the existing measurement regulatory framework for metering in Australia creates significant difficulties and complexities for the EV industry to currently comply with.

There are very few chargers available on the global market with NMI pattern-approved metering inside the equipment.

While an NMI pattern-approved meter could be installed upstream from the equipment, there are only few manufacturers which can interface with external NMI meters and communicate the metering information through OCPP to a head-end software. If the meter is not compatible with the software in the charger, significant and costly work would be required to get the installed meter to communicate with the software.

Requiring the installation of an NMI pattern-approved meter where charging sessions bill customers by kWh could mean:

- Significantly reduced availability of compliant charging equipment in Australia, effectively removing competition among suppliers and ultimately leading to bad outcomes for consumers;
- An incentive to move to time-based charging, which has proven to penalise consumers whose vehicles have slower charging rates (which tend to be lower priced vehicles). As a result, time-based charging is consequently being banned in Europe.
- No net benefit provided to the consumer, and global companies may opt to not serve the already comparatively small Australian market which would have a devastating effect on Australian EV industry competition.

Given Europe is currently working to have trade-certified metering built into EV chargers, there is a clear pathway over the next few years for many brands of EV chargers to have internationally compliant metering inside. Once finalised, these trade certified meters should be recognised as compliant in Australia.

The current Measurement Law Review should ensure Australia's Measurement Legislation is flexible enough to permit this pathway. Grandfathering of all EV charging equipment installed between now and then should also occur given the costs that would be involved with retrofitting.

We believe this approach would be in the best interests of consumers and industry.

DC metering requirements

EVC members recognise the need for similar consumer protections in fast DC charging sessions, however globally, there is currently no revenue grade meter available for DC charging. DC charging is therefore currently out of scope.

Any future Australian metering requirements for DC charging should be consistent with international standards and all equipment installed between now and then should also be grandfathered.

The current Measurement Law Review should ensure Australia's Measurement Legislation is flexible enough to permit this pathway.

Conclusion

Thank you for the opportunity to provide comment on the Measurement Law Review consultation Regulation Impact Statement (RIS). If you would like to discuss any aspects of this submission, please contact Larissa Cassidy, Manager of Policy (larissa@evc.org.au).