



25 June 2026

Australian Energy Market Commission
Level 15/60 Castlereagh St,
Sydney NSW 2000

Re: Facilitating EV charging infrastructure rollout under Commonwealth grants rule change

Dear AEMC,

I am writing to emphasise three principles for how decisions are made on this rule change proposal – and the two related proposals – and respond to three specific consultation questions.

These contributions are informed by research conducted at UNSW Sydney in collaboration with Waverley, Woollahra, and Randwick Councils, and Energy Consumers Australia. This research was conducted specifically to inform for these policy and regulatory decisions with transparent insights and evidence.

I strongly encourage the AEMC to draw upon the attached reports and publicly available data as you progress these catalytic decisions.

Kind Regards,

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Decision-making principles

The first principle I want to emphasise is that decision-making must be grounded in clear principles. Because public 'kerbside' chargers are foundational public infrastructure for the widespread, inclusive uptake of EVs, **the foundational principle ought to be to deliver public benefit.**

I recognise and commend the articulation of this in the Department's proposal and AEMC's initial assessments. Still, this should be strengthened and propagated into further, more detailed principles. In my recent research I propose that there are three necessary principles for delivering public benefit: that **kerbside infrastructure deployment is fast, fair, and future-proof.**

The second principle is that decision-making for public benefit must be **informed by publicly available evidence, and justified with transparent analysis thereof.** In the kerbside charging space, there is scant publicly available evidence, which fuels the contention of prospective policy pathways. As a modest contribution to addressing this, we have made charging data available from the Eastern Suburbs council's charging network. Ideally, national policy decisions would have access to a broader range of data – and this may be possible for the AEMC to achieve – but in its absence, this data already provides a rich set of insights and enables transparent analysis by the AEMC and stakeholders broadly.

The third principle is that decisions made at this pivotal, but early, stage in the development of public charging infrastructure needs to **take a broad view of possible options** and make decisions that value and maintain future flexibility. In this regard, the initiatives that are bounded in time and scale may provide excellent value.

Consultation questions

Consultation Question 1: Problem statement

I believe it is absolutely vital to develop this infrastructure in an inclusive manner, including the regions and remote communities. These communities are currently being held back. As our research showed¹, this is primarily due to the lack of charging infrastructure. Even back in 2021-22, electric vehicles had sufficient driving range to be effective for all but the most extremely isolated communities.

In terms of the current proposal's problem statement, I see three shortcomings. Firstly, the focus on AC charging misses the opportunities – and different user and commercial propositions – of medium power 30-50kW DC chargers. Our research shows such faster chargers to be all around superior to AC charging – at least in the metro context for which we have data.

Secondly, the approach of top-down identification of sites as either profitable in the near-term or 'blackspots' overlooks all important local contexts. This can lead to the misallocation of limited resources: undermining the social license of EVs, slowing EV adoption, and exacerbating the inequalities between those with off-street parking and those without.

A third, related, point is that local councils are being overlooked and/or mischaracterised as little more than cumbersome approvers of land access. Their incredible insights into, and interactions with, their local communities are underappreciated and their capacity to contribute to the high-quality development of locally appropriate infrastructure is going unrealised.

Consultation Question 4: Contributions from all electricity consumers

I am very supportive of government investment into this critical public infrastructure. Taxpayers provide the largest, most diverse population over which to distribute risks and costs, through the established progressive taxation system and democratic institutions to manage distributional impacts. Furthermore, governments' can facilitate the valuation of the many benefits of electrification, as well as trade-offs with many other national priorities.

I am considerably more wary of placing costs onto all electricity consumers via DNSPs, for reasons explained in the attached research papers.

Consultation Question 5: Proposed DNSP recovery of residual costs

I am open to the prospect of some costs being placed on DNSP's RAB, and thereby being passed on to their customers. However, this should be minimised through cost recovery from EV drivers and government subsidies (that distribute the cost burden more equitably).

It is particularly important to be mindful of how DNSPs are segregated between the city and country, which can worsen the inequalities between these communities.

The analysis in the attached research report raises two particular concerns about the current proposal.

The results indicate that, while splitting the network may reduce the number of chargers requiring government subsidies up front, it may exacerbate the need for long-term funding support (from taxpayers or electricity rate payers) because profitable sites can't cross-subsidise unprofitable sites.

¹ <https://doi.org/10.1080/00049182.2022.2086720> Free to access preprint <https://bjornsturmberg.com/wp-content/uploads/2022/07/202207-Australian-Geographer-Exploring-the-feasibility-of-electric-vehicle-travel-for-remote-communities-in-Australia.pdf>

The results suggest that providing access to charging hardware to 'free-of-charge' to retailers (who would pass on the benefits in reduced pricing) distributes too much of the benefits to EV drivers, placing too great a cost onto electricity customers and/or taxpayers. Charging a 'fee-for-use' seems to enable fairer distributions of costs and benefits.

Key research references

Fast, fair and future-proof: kerbside charging for the public good

<https://www.ceem.unsw.edu.au/sites/default/files/documents/202605%20-%20Fast%2C%20fair%20and%20future-proof%20-%20kerbside%20charging%20for%20the%20public%20good.pdf>

Executive summary

Public 'kerbside' charging is vital for the mass uptake of electric vehicles (EVs), providing cheap and convenient charging to all drivers. While it is widely agreed that Australia urgently needs more kerbside charging infrastructure, there is fierce debate about who should own it and who should pay.

This discussion paper does not hold the answers, rather it seeks to clarify how these questions should be assessed for the public good. It proposes three principles: that kerbside charging should be delivered fast, fair, and in a future-proof manner.

It presents transparent analysis – backed by publicly available data and code – of two pressing policy questions. Firstly, whether to split charging sites into commercially run networks and non-commercial networks. The results indicate that, **while splitting the network may reduce the number of chargers requiring government subsidies up front, it may exacerbate the need for long-term funding support (from taxpayers or electricity rate payers) because profitable sites can't cross-subsidise unprofitable sites.**

Secondly, it analyses the fairness of two possible pricing models for DNSP owned chargers, were they to be permitted to own them. **The results suggest that providing access to charging hardware to 'free-of-charge' to retailers** (who would pass on the benefits in reduced pricing) **distributes too much of the benefits to EV drivers, placing too great a cost onto electricity customers and/or taxpayers.** Charging a 'fee-for-use' seems to enable fairer distributions of costs and benefits.

Lastly, the paper presents an overview of five ownership models, assessing their alignment with the proposed principles and analysis insights. These analyses do not define the solution but are intended to inform the trade-offs that regulators, policy makers and politicians must inevitably make. These will determine the impacts on EV drivers, commercial operators, electricity customers, taxpayers, and the greater public good.

I note recent research that further underscores the importance of kerbside charging by finding that incentivising charging during solar hours further increases charging away from home².

² <https://doi.org/10.1016/j.jpubeco.2026.105696>

How are kerbside chargers used? Insights from the Eastern Suburbs Charging Network

<https://zenodo.org/records/19233669>

This dataset contains data on the location and usage of kerbside electric vehicle chargers in the Eastern Suburbs of Sydney, Australia, from the start of September 2025 to the end of February 2026. This covers approximately 27,000 sessions.

The data is accompanied by a report providing initial analysis of the data. Clear findings are that dedicated parking is essential, and that 30-50kW DC chargers are greatly superior to AC chargers. **By far the best infrastructure (within the data sample) is 30-50kW chargers with 2hr dedicated parking restrictions.**

Executive summary

Kerbside charging is critical public infrastructure – for locals & visitors

What makes good kerbside charging sites?

Essential features

- Have dedicated EV parking spaces
- Are close to apartments & shops

A sweet spot

30-50kW DC chargers with 2hr dedicated EV parking restrictions appear to be ideal. These:

- can fully charge a typical EV in 2hrs,
- are more convenient & more frequently used than AC,
- are cheaper than (100kW+) ultra-fast DC chargers,
- delivered on average 4 times the energy of AC sites

Through the next phase of EV uptake, kerbside charging should be expanded to maintain ratio of 1 charging space per 70 local EVs

Next steps

Research & innovation is needed to shift kerbside charging demand from grid peak hours (currently 30% of demand)



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