



25 June 2019

Electricity Authority + Commerce Commission Joint Project

By email: [eacomcomjointproject@comcom.govt.nz](mailto:eacomcomjointproject@comcom.govt.nz)

### **ChargeNet feedback on Spotlight on Emerging Contestable Services**

ChargeNet NZ Limited (ChargeNet) welcomed the opportunity to collaborate on this project with the Electricity Authority and the Commerce Commission. As mentioned in our earlier submission, this topic is of significance to ChargeNet given our ongoing commercial activities providing electric vehicle charging infrastructure to New Zealand. We reiterate our earlier opinion that this is a project long overdue.

To keep matters short and to the point, below is a summary of our feedback:

- Historically we have agreed there was a need for EDBs to understand the impact of emerging technologies – like EV charging infrastructure – on the distribution network;
- We believe the impact to now be well understood, and there is a pressing need to commercialise that charging infrastructure;
- ChargeNet cannot compete with free, and the existence of free rapid chargers (50kW+) has a chilling effect on investment - suppressing installation of sufficient numbers of rapid chargers in those markets, severely limiting EV uptake in those areas;
- In essence, free rapid charging stifles competition and on that basis, there is a clear role for ComCom and the EA to intervene;
- There should be more extensive regulation and oversight in this space: we are concerned the status quo does not provide the regulator with enough power and we support the work being proposed in order to create a level playing field of competition, promoting the best outcome for consumers.
- Any gaps in our brief discussion points can be covered by our support for the ERANZ submission.

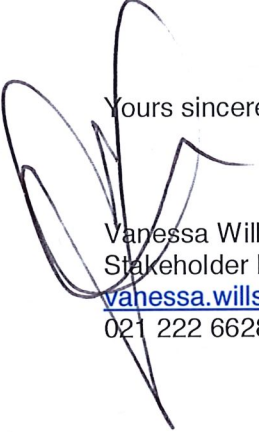
### **Ongoing engagement**

We are very engaged on this topic given the effect on our core business, and see ChargeNet as a key stakeholder in this consultation. We thank the Energy Efficiency and Conservation Authority (EECA) for requesting our presence at this workshop, and look forward to working with the EA and ComCom on any ongoing matters with this project.

 **charge.net.nz**

Electric Vehicle Fast Charger Network



  
Yours sincerely,

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