

5 September 2022

Andrew Caseley
Chief Executive
Energy Efficiency and Conservation Authority
By email to STAR@eeca.govt.nz

Dear Andrew

Improving the performance of electric vehicle chargers

1. This is a submission from the Major Electricity Users' Group (MEUG) on the Energy Efficiency and Conservation green paper "Improving the performance of electric vehicle chargers" published 18 August 2022.¹ MEUG members have been consulted in the preparation of this submission. This submission is not confidential. Members may lodge separate submissions.
2. From reading the paper there seems to be two policy issues within the remit of EECA:
 - a) Possible safety issues.²
 - b) Information asymmetry for buyers on pros and cons of smart EV chargers.Options to address these can be considered by EECA now without legislative changes.
3. Other policy issues such as barriers to realising co-ordination of EV chargers to lower network costs are governed by the Electricity Authority and the Commerce Commission.
4. Finally, an observation that the global market for EV chargers has been on a fast-track of innovative technology discovery and commercialisation and that will likely continue. That global market, including the regulatory practices of large economies, will improve charger interoperability and connectivity. The New Zealand EV market should be left to be a fast adopter, subject to immediately addressing the two policy issues in paragraph 2 above. In a submission to Wellington Electricity Lines Ltd on an EV Connect paper in 2020 we made the same point; noting the similarity with how market led organic growth in smart meters has worked well compared to other jurisdictions that regulated smart meter deployment.³

Yours sincerely



Ralph Matthes
Executive Director

¹ <https://www.eeca.govt.nz/assets/EECA-Resources/Consultation-Papers/EV-charging-Green-Paper-8-August-2022.pdf>

² EECA green paper p16, section titled "Charging cables."

³ <http://www.meug.co.nz/node/1102>