

## Proposed National Low and Zero Emission Vehicles Work Program - Feedback Form

Name of organisation providing feedback: Australian Electric Vehicle Association

Barrier	Action	Support	Importance of Action	Current industry action	Comment
Leadership	1. Work with Commonwealth agencies to support the National EV Strategy and the National Hydrogen Strategy.	Yes/No	L / M / H		Any interjurisdictional coordination is potentially beneficial if it does not take resources from high priority local work. The EV strategy is a priority as it is more imminent than hydrogen.
	2. Develop a LZEVE definition to guide future policy decisions and actions.	Yes/No	L / M / H		Clarity and consistency of definitions is essential to avoid confused thinking within and between agencies/ jurisdictions. This should not be a hard task.
	3. Consider developing LZEVE fleet targets: a. For the overall Australian vehicle fleet. b. For each jurisdiction for their government owned and managed fleet.	Yes/No	L / M / H		Targets help create an expectation of future outcomes and indicate some commitment by government to those outcomes. The initial priority should be for 'own' fleet targets. Targets for the overall Australian fleet are harder to manage depending on models available in the Australian market.

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	4. All levels of government to develop policies that encourage the purchase of LZEVs in government fleets and large government contracts.	Yes/No	L / M / H	Many state, LG and some private company have initiatives already. Current models are close to cost competitive on whole of life basis and this will be generally true within 2-3 years.	An essential priority: 1) whole-of-life focus of fleets brings cost parity first. 2) fleets are main source of used cars. 3) gov'ts can manage cost of uptake in their fleets. 4) buying power may bring new models, better prices 5) introduces many new users to EVs  But: fit-for-purpose <b>essential</b>  Fast charge infrastructure coverage in operating areas generally needed.
	5. Support the Australian Government to progress the review of fuel efficiency and vehicle emissions standards.	Yes/No	L / M / H		Well-chosen vehicle emission standards have both health and economic benefit to Australians. The introduction of LZEVs will become necessary to achieve any appropriate standard so this implicitly supports LZEV uptake which in turn brings other benefits.
<b>Infrastructure Availability</b>	1. Consider adoption of current market-based standards for EV plugs for charging infrastructure.	Yes/No	L / M / H		This is gradually working itself out in the market. At this point any standard is essentially formalising the status quo.

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	2. Identify priority interstate routes and precincts for charging and refuelling infrastructure for inclusion in future infrastructure projects.	Yes/No	L / M / H	Chargefox and EVie charge networks have been funded and cover main interstate routes. QESH, NRMA and others are filling in some regional areas. More destination chargers are expected to 'pop up' over time.	Some remaining routes need to be covered to ensure all main population areas are covered. Plans for covering lower population routes should be developed that provide maximum coverage with the minimum number of sites. Some financial support will be required to make regional charging infrastructure viable.
	3. Develop national signage standards for identification of LZEV charging and refuelling infrastructure.	Yes/No	L / M / H	AEVA have used a consistent sign to identify sites that we have encouraged to provide charging. We note however that several variants are in use by others.	Most new EVs come with sat-nav that includes maps showing charge locations reducing the need for directional signage. Consistency of information signs on or near charging sites to designate chargers has merit.
	4. Consider the recommendations of the National Hydrogen Strategy's Transport workstream for Hydrogen refuelling infrastructure.	Yes/No	L / M / H		AEVA believes hydrogen may have a long term role in supporting long range heavy transport and air transport using surplus renewable energy, but that electric vehicle technology should be the priority for the next 5 years.
	5. Work with industry to develop national interoperability standards for charging infrastructure, such as common open payment	Yes/No	L / M / H	A move toward credit card access of charge stations can achieve this. Systems exist that permit interoperability with existing software.	Interoperability is achievable with existing systems. It may need to be mandated to ensure networks participate as it is not perceived by some to be in their commercial interests.

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	platforms and motorist accessibility.				
<b>Upfront purchase costs and model availability</b>	1. Assess all benefits and costs of LZEVs to the consumer and economy, and the effectiveness of financial incentives and other policies aimed at increasing consumer demand for LZEVs and charging infrastructure.	Yes/No	L / M / H	OEH NSW had a project to do this in 2017-18.	Clarity about the costs and benefits is a desirable goal to assist in framing effective policy. The effectiveness of different policies including financial or other incentives can then be assessed against this in a meaningful way.
	2. Publish and maintain a central list of funding and financing sources for LZEVE projects, such as government green bonds and CEFC's finance programs for greener vehicles.	Yes/No	L / M / H		Useful, but the information is not too hard to find so this should be low resources/low priority.
	3. Evaluate existing mass payload concession trials for LZEVs and explore extending concessions if appropriate.	Yes/No	L / M / H		This is desirable if payload concessions can be granted without higher road maintenance costs from higher axle loadings.

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	4. Work with industry and local governments to investigate opportunities for LZEVE night freight operations.	Yes/No	L / M / H		
Lack of Public Information	1. Develop a national LZEVE communication strategy to promote the benefits of LZEVEs for consumers and fleets.	Yes/No	L / M / H	This has been a major role of AEVA for many years through information brochures, displays, try and drive days etc. We have and continue to engage with thousands of Australians each year. We maintain a national resource base of info and attempt to incorporate current information from government and industry sources.	Increased public information is a key element of LZEVE uptake. Co-ordination and sharing of content and strategies can make gains but should not be an excuse for not starting local initiatives
	2. Implement the amendment to the <i>Australian Light Vehicle Standards Rules 2018</i> – requiring electric and hydrogen vehicles to be identified by markings on a number plate.	Yes/No	L / M / H		Highly desirable to help increase the visibility of EVs to the general public and as an aid to emergency responders in accident situations.

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	3. Share the outcomes of individual LZEVE trials to avoid duplication and accelerate deployment of LZEVEs.	Yes/No	L / M / H		Many levels of government and industry have done/are doing trials. The wheel has been invented enough times! Any efforts to reduce duplication and hasten application of results should be strongly supported.
	4. Develop guidelines to support installation of LZEVE charging and refuelling infrastructure.	Yes/No	L / M / H	AEVA have pushed for consistent, thoughtful approaches to installation and have produced some information to support this.	Clarity and consistency of regulation and planning requirements is desirable. Some design and installation guidelines would assist sites considering installing chargers but sites are highly variable so it is hard to be overly prescriptive.
	5. Develop guidelines to support vehicle fleet managers transition to LZEVEs.	Yes/No	L / M / H	Project to support fleet uptake have been undertaken (with support from AEVA in some cases) for many fleets and jurisdictions.	This is a new area for most fleet managers so clear, current information and strategic approaches can assist them to make decisions.
	6. Work with industry to develop data sharing and exchange standards for vehicle, charging and energy data, while preserving personal privacy and commercial confidentiality. These can provide insights to governments, planners and infrastructure providers.	Yes/No	L / M / H		Desirable in principle but tricky. Rather than a generalised data sharing, more targeted data gathering and use may be more realistic – eg loads on local transformers.  See general comments below about integration with the electricity network.

The questionnaire lacks any specific reference to ‘integration’ of EVs with the electricity grid using smart EVSEs. Issues to be addressed include:

- Avoiding new (higher) peak demands from charging with excessive loads on local transformers and substations
- The potential to ‘soak up’ solar day time peaks and periodic wind generation surpluses
- The value of EV batteries as grid connected storage through V2X, already enabled on some production cars, to provide distributed grid services from FCAS to load balancing.

AEVA believes these issues should be a high priority for any LZEV work program as they will hit hard and fast once EV uptake accelerates but have a long lead time to prepare for. Many of the issues of data sharing arise in this context but are best formulated in the context of addressing these issues and taking advantages of the opportunities these offer.

**Thank you for your response. Please return the completed form by 20 September 2019 to [Pamela.z.palmer@tmr.qld.gov.au](mailto:Pamela.z.palmer@tmr.qld.gov.au)**

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