

EVC submission to the CER Data Exchange Industry Co-Design Consultation Paper

November 2024

With reference to: [cer-data-exchange---consultation-paper---oct-2024.pdf](#)

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Preamble:

The Electric Vehicle Council (EVC) is the national body representing the electric vehicle industry in Australia. As the market is emerging in Australia, our work is particularly aimed at increasing certainty for investment through policy, knowledge sharing and education.

The EVC welcomes ongoing discussion on these matters, and can be reached via office@evc.org.au

EVC's response, and position:

The EVC has previously commented on adjacent work to this project that was led by the Energy Security Board (ESB), and then progressed by Australian Energy Market Operator (AEMO) until relatively recently, relating to Electric Vehicle Supply Equipment (EVSE) standing data:

<https://electricvehiclecouncil.com.au/wp-content/uploads/2023/02/Electric-Vehicle-Council-ESB-EVSE-Standing-Data-Register-Consultation-Paper.pdf>

We note that priority **use case 3** in the CER data exchange proposal is adjacent to this proposal.

With respect to standing data relating to EV charging equipment, we suggest that the data be sourced from electrical safety regulators in each state, using existing frameworks such as Certificates of Electrical Safety (COES) in Victoria, Certificate of testing and compliance, Certificate of Compliance of Electrical Work (CCEW) in New South Wales, and equivalent in the other respective jurisdictions.

We note that many EV drivers will choose to charge their EVs without installing dedicated EV charging equipment, which means there will be no triggering event by which the energy sector participants will become aware that a particular residence has acquired an EV.

We note from page 43: *“Allow organisations such as OEMs to access testing and certification environments for CER devices such as Solar and Battery inverters and Electric Vehicles via a common, authenticated data platform”*



This could be read to imply that vehicle OEMs will be **required** to test/certify road registered vehicles against AEMO/DNSP requirements. For the avoidance of doubt, this would not be appropriate, and if implemented would likely restrict vehicle options available to Australian consumers. Road registered vehicles in Australia are regulated by way of the Australian Design Rules, which are aligned wherever practicable with international requirements.

The EVC's position is that if the intent is to stand up local capabilities to support interoperability testing of EVs on a strictly opt-in basis, that would be fine.