



Attachment 13 - Classification of Services

2025–30 Revised Regulatory Proposal

December 2024

Company information

SA Power Networks is the registered Distribution Network Service Provider for South Australia. For information about SA Power Networks visit sapowernetworks.com.au

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Disclaimer

This document forms part of SA Power Networks' Revised Regulatory Proposal to the Australian Energy Regulator for the 1 July 2025 to 30 June 2030 regulatory control period. The Revised Proposal and its attachments were prepared solely for the current regulatory process and are current as at the time of lodgement.

This document contains certain predictions, estimates and statements that reflect various assumptions concerning, amongst other things, economic growth and load growth forecasts. The Revised Proposal includes documents and data that are part of SA Power Networks' normal business processes and are therefore subject to ongoing change and development.

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Note

This attachment forms part of our Revised Proposal for the 2025–30 Regulatory Control Period. It should be read in conjunction with the other parts of the Revised Proposal.

Our Revised Proposal comprises the Overview document and Attachments listed below, and the supporting documents that are listed in Attachment 20. The light grey listed attachments below were submitted in our January 2024 Proposal and are not being resubmitted with our Revised Proposal.

Document	Description
	Revised Regulatory Proposal overview document
Attachment 0	Customer and stakeholder engagement program
Attachment 1	Annual revenue requirement and control mechanism
Attachment 2	Regulatory Asset Base
Attachment 3	Rate of Return
Attachment 4	Regulatory Depreciation
Attachment 5	Capital expenditure
Attachment 6	Operating expenditure
Attachment 7	Corporate income tax
Attachment 8	Efficiency Benefit Sharing Scheme
Attachment 9	Capital Expenditure Sharing Scheme
Attachment 10	Service Target Performance Incentive Scheme
Attachment 11	Customer Service Incentive Scheme
Attachment 12	Demand management incentives and allowance
Attachment 13	Classification of services
Attachment 14	Pass through events
Attachment 15	Alternative Control Services
Attachment 16	Negotiated services framework and criteria
Attachment 17	Connection Policy
Attachment 18	Tariff Structure Statement Part A
Attachment 18	Tariff Structure Statement Part B - Explanatory Statement
Attachment 19	Legacy Metering
Attachment 20	List of Proposal documentation

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1 Overview

Service classification defines the type of economic regulation, if any, that will apply to services provided by electricity Distribution Network Services Providers (**DNSPs**). This includes whether or not a service is subject to regulation, the approach to cost recovery for these services (at a high level) and whether or not a service will need to be ring-fenced from other services offered by a DNSP.

In accordance with section 6.2 of the National Electricity Rules (**NER**), the Australian Energy Regulator (**AER**) may classify a distribution service as either:

- a **Direct Control Service** - these services are subject to direct regulatory oversight of revenues / prices, and comprise of Standard Control Services (**SCS**) which are shared across all customers on the network and Alternative Control Services (**ACS**) which are initiated by and attributable to specific customers;
- a **Negotiated Distribution Service** - these services are subject to a negotiate / arbitrate framework whereby the AER does not directly set prices, but approves a negotiating framework and criteria that we must apply in negotiating the terms and conditions (including price) for the provision of these services with customers. The AER only becomes directly involved in the case of a dispute; or
- an **Unclassified / Unregulated Service** - these are services subject to effective competition which therefore do not require regulation.

The Framework and Approach (**F&A**) process, as set out in section 6.8.1 of the NER, is the first formal step in the regulatory process and sets the foundation for the regulatory reset and the revenue proposal. The AER published the F&A for SA Power Networks 2025-30 Regulatory Control Period (**RCP**) in July 2023¹. The classification of distribution services must be as set out in the relevant F&A unless a material change in circumstances justifies departing from the service classification set out in the F&A².

SA Power Networks submitted its Regulatory Proposal for the 2020-25 regulatory control period (**RCP**) in January 2019 (**Original Proposal**). In our Original Proposal, SA Power Networks' proposed classifications of services were consistent with those contained within the AER's final F&A except for legacy metering services which we proposed to reclassify as SCS. This was consistent with a Guidance note³ issued by the AER in November 2023, with an SCS classification enabling the legacy metering costs to be socialised across all customers during the accelerated smart meter rollout period.

The AER's draft decision⁴ (**Draft Decision**) accepted SA Power Networks' proposal to reclassify legacy metering services from Alternative Control Services (**ACS**) to SCS. The AER also proposed to include data services as a common distribution service, consistent with its final decisions for the 2024-29 regulatory determinations. In response to discussions with SA Power Networks, the AER also discussed electric vehicle (**EV**) charging infrastructure to gather views from stakeholders on its potential as a classified distribution service.

A summary of our responses to the AER's Draft Decision is provided in Table 1 below.

¹ AER, *Framework and approach, SA Power Networks 2025-30*, July 2023

² NER 6.12.3 (b).

³ AER, *Legacy metering services – guidance note*, November 2023

⁴ AER Draft Decision Attachment 13 – Classification of Services – SA Power Networks – 2025-30. Distribution revenue proposal – September 2024.

Table 1 - Summary of our response to the AER’s Draft Decision – Classification of services

	AER Draft Decision	Revised Proposal
Legacy metering services	In its Draft Decision the AER accepted our proposal to reclassify legacy metering services to SCS in accordance with the AER’s November 2023 ‘Legacy metering services – guidance note’ ⁵ .	SA Power Networks accept the AER’s Draft Decision to reclassify metering services to SCS and have retained the SCS classification for our Revised Proposal.
Data services	The AER’s Draft Decision included the provision of standardised data sets and/or data that is provided to a distributor as a common distribution service. Data requested by customers or third parties for the provision of data beyond the standardised data sets has been included as an ACS. This is consistent with the AER’s final decisions for the 2024–2029 regulatory determinations. The AER considered these changes to be in line with the intent of the Australian Energy Market Commission’s (AEMC’s) Metering Review.	We do not accept the AER’s proposed changes for data services. We propose to delete the additional wording in SCS and remove reference to standardised data sets in ACS in our Revised Proposal. Our reasons for this are set out below.
EV charging infrastructure	The AER’s Draft Decision also discussed EV charging of last resort to gather views from stakeholders regarding: its potential as a classified distribution service; the benefits or costs of enabling a DNSP to provide this service; and the avenues in which the AER could consider classification to permit DSNPs to provide this service (if considered appropriate) under the current rules.	SA Power Networks propose to classify EV charging of last resort services as ACS for the 2025-30 RCP. We consider there has been a material change in circumstances since the finalisation of the AER’s final F&A in July 2023, justifying the need for departure from the service classifications contained in the final F&A.

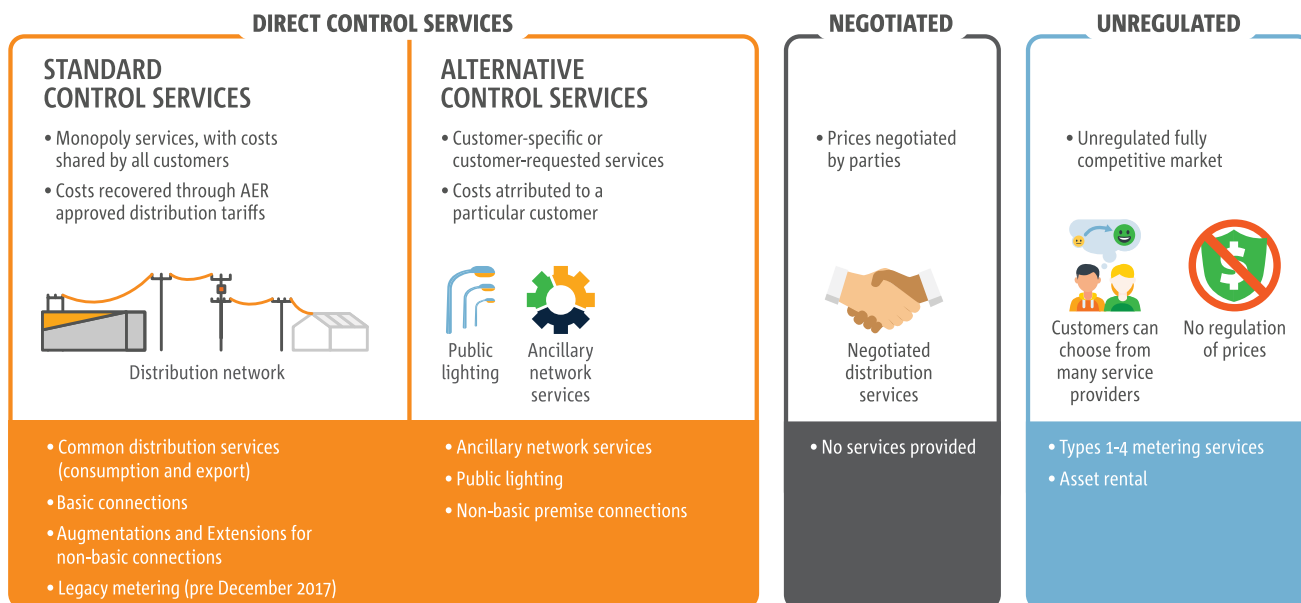
These services are discussed further in this attachment.

2 Our Original Proposal

Our proposed service classifications for our Original Proposal, as set out in Appendix A and summarised in Figure 1, were consistent with the AER’s final F&A except for ‘legacy metering services’.

⁵ AER, *Legacy metering services – Guidance note*, November 2023, p.1.

Figure 1: Proposed classification of distribution services for 2025–30 RCP



In alignment with the AER’s ‘Legacy metering services - guidance note’, SA Power Networks proposed to reclassify legacy metering services to SCS for the 2025-30 RCP, where costs are recovered across a broader SCS customer base. This will assist in addressing potential pricing inequities as the smart meter rollout progresses, so that customers with meters replaced later in the deployment are not disadvantaged by being charged inequitably higher costs for receiving the same metering services.

SA Power Networks also proposed to include the non-recurrent transitional costs associated with the accelerated replacement of legacy meters within the legacy metering services component of SCS. Where this will isolate any price impact associated with these transitional costs into the legacy metering component during the rollout.

We consulted with our Community Advisory Board and Tariff Working Group on this proposed change in classification and the likely impact on SCS pricing. Customers provided in principle support for this approach and for the legacy metering costs to be recovered as a separate charge from all small customers.

Noting this, we proposed the following additional wording within the service classification table to reflect this change:

- *Legacy metering transition services required to support the accelerated replacement of legacy meters, including for example the development of the legacy meter retirement plan.*

We did not propose any other changes to service classification at this time.

3 AER’s Draft Decision

The AER’s Draft Decision accepted SA Power Networks’ proposal to reclassify legacy metering services from ACS to SCS. The AER considered a reclassification of legacy metering services to SCS as appropriate, with this approach resulting in the benefit of recovering SA Power Networks’ metering services costs across a wider customer group during the smart meter transition.

The AER did not include the additional wording for legacy metering transition costs as a specific activity as it considered it was already adequately covered in the legacy metering grouping. This was in-line with the AER’s decisions for Endeavour Energy and Essential Energy.

The AER also proposed to amend SA Power Networks service classification to include data services, consistent with its final decisions for the 2024-29 regulatory determinations. The AER stated these amendments were to give effect to the intentions of the AEMC’s metering review and would provide clarity around what data will be provided on request under the common distribution service and what may be charged for under ACS.

The Draft Decision retains the wording for common distribution services and alternative control services consistent with the 2024-29 regulatory determinations. However, in response to issues raised by SA Power Networks, the AER decided to remove the footnote from the proposed amendment in its Draft Decision.

In July 2024, SA Power Networks informed AER staff of the possibility of us proposing an EV charging services of last resort as an ACS for our Revised Proposal. Noting this, and the limited time for customer feedback on our Revised Proposal, the AER considered whether it should classify EV charging infrastructure as a distribution service in its Draft Decision, posing several questions to stakeholders to garner feedback.

4 Our Revised Proposal

SA Power Networks accepts the AER’s Draft Decision to reclassify legacy metering services to SCS for the 2025-30 RCP in line with the AER’s ‘Legacy metering services - guidance note’. This will enable to recovery of legacy metering costs across a broader customer base, eliminating potential pricing inequities during the accelerated smart meter rollout. We also accept the AER’s Draft Decision to not include our proposed additional wording for legacy metering services required to support the accelerated rollout. We are satisfied this is already covered broadly within the legacy metering grouping.

We do not accept the AER’s Draft Decision service classification drafting adjustment for metering ‘data services’. We instead propose to retain the common distribution service SCS listing as contained within the AER’s final F&A, without amendment. We also propose to remove reference to ‘standardised data sets’ within the ACS amendment.

SA Power Networks also seeks classification of EV charging of last resort services as an ACS, we believe there has been a material change in circumstances that warrants departure from the final F&A⁶. Our Revised Proposal requests the AER classify this new service as an ACS for the 2025-30 period, where the cost of providing this service will be funded in full by the requesting party.

Data services and EV charging of last resort services are discussed in further detail below.

4.1 Data services

Consistent with the 2024-29 regulatory determinations, the AER’s Draft Decision amended SA Power Networks service classification to include data services as follows:

- The *“provision of standardised data sets and/or data that is provided to a distributor, at no cost to the distributor, in accordance with obligations under the rules”* as a new common distribution, standard control service; and
- *“data requests by customers or third parties for the provision of electricity network data beyond standardised data sets or obligations under the rules”* as an alternative control service.

The AER’s Draft Decision stated these amendments were to give effect to the intentions of the AEMC’s metering review over the next regulatory period, referencing the rule change request made by Energy Consumers Australia to enable access to real time data⁷. SA Power Networks does not support this

⁶ AER, *Framework and approach, SA Power Networks 2025-30*, July 2023

⁷ Energy Consumers Australia, *Rule change request: access to real time data for consumers and their authorised representatives*, 24 June 2024.

amendment and remains concerned that the AER’s proposed drafting could be interpreted as obligating SA Power Networks to provide any data we receive at no cost to customers. Specifically, we interpret the AER’s wording as imposing a new obligation on us: requiring us to provide to customers any data we have received at no cost under the rules as a common distribution service (SCS), not just where we have an obligation to provide data under the rules.

We note the AEMC’s final rule change for accelerating the smart meter deployment (published on 28 November 2024) provides for DNSPs to receive power quality data from smart metering installations ‘free of charge’. The AER’s proposed amendment to include *“provision of standardised data sets and/or data that is provided to a distributor, at no cost to the distributor, in accordance with obligations under the rules”* within common distribution services could be interpreted by our customers as also requiring SA Power Networks to provide this power quality data to customers. We do not believe the intention of the AEMC’s rule change was also to provide this power quality data to customers. The AEMC, in response to stakeholder feedback, has confirmed that the basic PQD arrangements in the final rule has been designed to specifically enable better access for DNSPs to basic power quality data⁸. We fully support this position and note that to extract and provide power quality data to customers at scale would require systems modifications. We have not costed or included any additional costs in our 2025-30 expenditure forecasts to provide power quality data to customers.

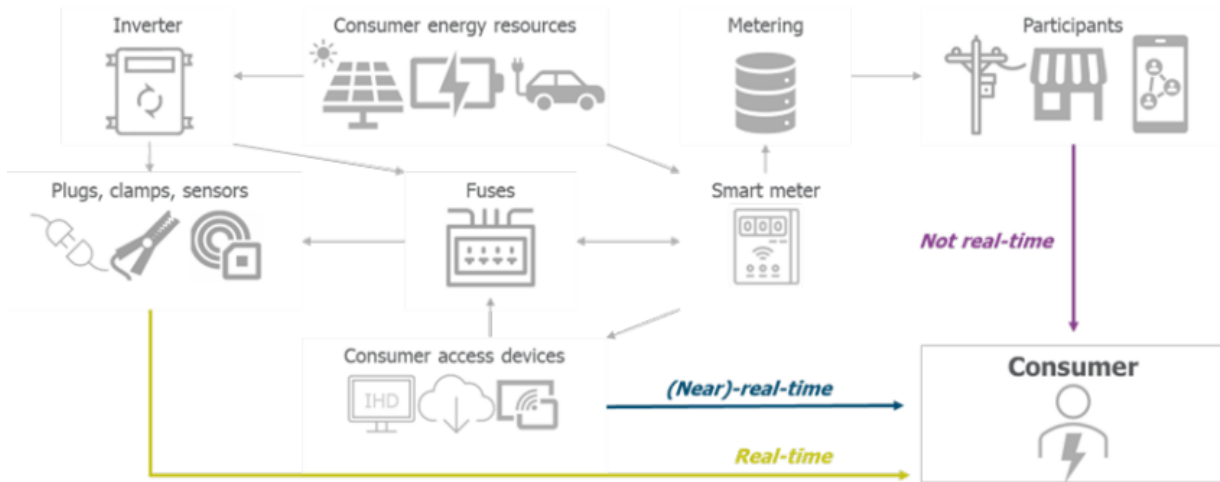
The AER’s Draft Decision acknowledged SA Power Networks’ concerns however, it does not consider this amendment puts an obligation on SA Power Networks. The AER stated the amendment does not require SA Power Networks to create any standardised data sets or provide any data to consumers, any obligations to do so will be set out in the NER or the National Energy Retail Rules (**NERR**) following a final decision on the Energy Consumers Australia rule change request.

We note, the AEMC published its ‘Real-time data for customers’ consultation paper on 10 October 2024, in response to the Energy Consumers Australia rule change request. This rule change request proposes introducing a right for consumers and their authorised representatives to access consumers’ real-time data from smart meters. The proposal is consistent with the AEMC metering review recommendations, requiring retailers and metering parties to give real-time data to customers or their authorised representatives on request.

The proposed real-time data for customers rule change does not consider imposing these obligations on DNSPs as we do not have access to real-time data (refer to Figure 2 below). Similarly, the AEMC’s Final report on its review of the regulatory framework for metering services, issued on 30 August 2023, did not recommend any additional obligations on DNSPs to provide customers greater access to data.

⁸ AEMC – Rule determination accelerated smart meter deployment – 28 November 2024, page 23.

Figure 2: Examples of pathways through which consumers can access their data⁹



SA Power Networks supports the AEMC’s accelerated smart meter rollout program, recognising the extensive advantages it offers to customers, such as enabling access to energy usage information in real-time. Noting this, we acknowledge SA Power Networks’ limited involvement in the provision of smart metering services, with retailers and their appointed metering coordinators responsible for the installation and maintenance of smart meters and the associated metering data. SA Power Networks will essentially be a receiver of smart meter data, with no ability to directly interact with the installed smart metering assets.

However, DNSPs do have an existing obligation to provide customers, on request, with up to 2 years of historical energy consumption and export data free of charge in accordance with the NERR¹⁰. This will include the provision of interval metering consumption and export data we receive from metering coordinators for smart meters. SA Power Networks has approximately 2,000 or 0.3 percent of customers or their representatives registered to receive consumption data, with most customers opting to receive this information from their chosen retailer.

We do not consider a drafting change for common distribution services is required in our service classification, as there are no additional obligations prescribed within the existing or proposed rules at this stage. SA Power Networks already provides historical energy consumption and export data as SCS, without it being specifically listed within our common distribution services activities. We note ‘common distribution services’, includes, but is not limited to those services listed. It is not an exhaustive list of services that SA Power Networks is required to provide as a SCS. We will continue to provide data to customers where required in accordance with the rules, irrespective of whether it is listed in our service classification.

Our Revised Proposal retains the ‘common distribution service’ SCS listing as contained within the AER’s final F&A, with the AER’s proposed data services amendment removed. For consistency, we also propose to remove reference to ‘standardised data sets’ within the provision of electricity network data in ACS. We are comfortable with the other amendments in this section.

⁹ AEMC Consultation Paper National Electricity Amendment (Real-time data for consumers) Rule and National Energy Retail Amendment (Real-time data for consumers) Rule. 10 October 2024, Figure 3.1, page 15.

¹⁰ National Energy Retail Rules (NERR), clause 86A

4.2 EV charging of last resort

4.2.1 Background

Electrifying our transport fleet is a vital part of the overall transition from carbon-emitting technologies to a greener, cleaner future that accords with the SA Government’s declaration of a Climate Emergency. The increased adoption of EVs plays a pivotal role in reaching our climate goals:

- **Reduced Greenhouse Gas Emissions:** EVs produce zero tailpipe emissions. This means that as more people switch from petrol or diesel cars to EVs, the total amount of greenhouse gases emitted by the transport sector can be significantly reduced.
- **Energy Efficiency:** EVs are generally more energy-efficient than conventional vehicles. This means they use less energy to travel the same distance, further reducing their environmental impact.
- **Renewable Energy Integration:** When charged with renewable energy (like solar or wind power), EVs can operate virtually carbon-free. As Australia continues to increase its renewable energy capacity, the environmental benefits of EVs will only grow.
- **Grid Stability:** EVs can potentially act as a form of energy storage, absorbing excess power during periods of low demand and feeding it back into the grid when demand is high. This can help to balance the grid and facilitate the integration of more renewable energy sources.
- **Lower Fossil Fuel Dependence:** By reducing the demand for petrol and diesel, EVs can help to decrease Australia's reliance on fossil fuels, leading to a more sustainable and resilient energy system.

In October 2022, SA Power Networks submitted our request to the AER to amend or replace the F&A to apply for the 2025-30 RCP. In this request we noted that SA Power Networks’ distribution network will be an enabler of EV charging infrastructure, with the physical deployment of EV charging for public use expected to be delivered by the contestable market. We also noted the unique challenges for EV uptake in rural and regional Australia. Where the market fails to deliver the necessary charging infrastructure, DNSPs may be required to play a more active role in the provision of this infrastructure. We therefore requested the AER consider an EV charging of last resort service in the development of SA Power Networks F&A for 2025-30.

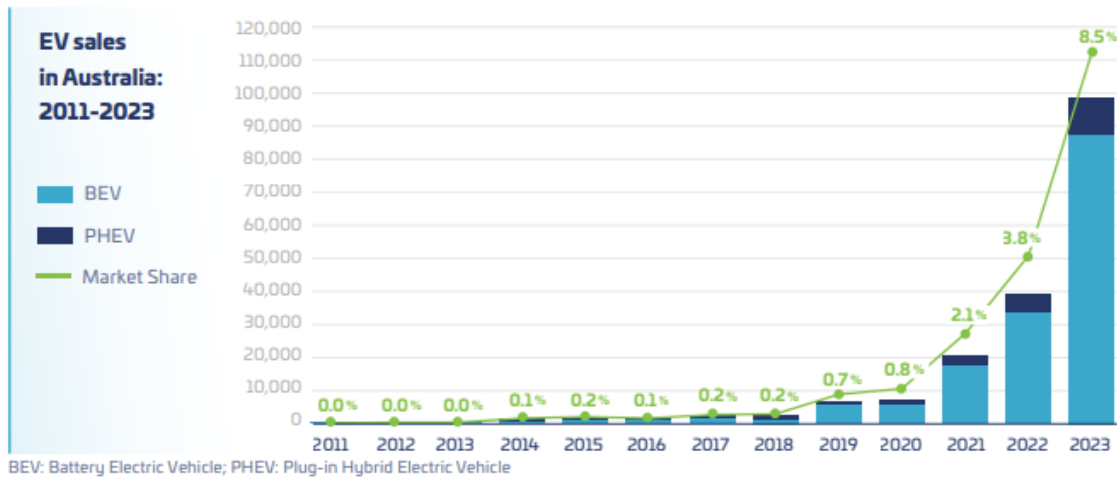
In its preliminary position paper¹¹, the AER acknowledged greater clarity was required to facilitate a classification of services and encouraged SA Power Networks to continue to engage with its stakeholders on this matter and revert back following the emergence of a clearer position on the charging infrastructure landscape. Noting this, the AER did not propose to classify electric vehicle charging of last resort services in its preliminary position paper.

Noting EV charging was still an emerging issue, with some service providers actively working on delivery of EV charging infrastructure across South Australia, SA Power Networks supported the AER’s preliminary decision to not classify the provision of EV-related infrastructure services in its final F&A.

Since then, the EV landscape has continued to evolve. As can be seen in Figure 3, the growth in EV sales has increased rapidly in recent years. The sale of new EVs in Australia more than doubled in 2023, with 6.8% of all new vehicles sold in South Australia being EVs. We estimate that there are currently around 10,000 EVs in South Australia, compared to approximately 2,000 in 2022 when we were consulting on the F&A. We expect this trend to continue, with the South Australian Government predicting over 250,000 EVs on South Australian roads by 2030.

¹¹March 2023, AER Preliminary Position Paper: Framework and Approach Papers for Ergon Energy, Energex, SA Power Networks and Directlink 2025-30, page 7-8

Figure 3: New EV Purchases in Australia¹²



The Electric Vehicle Council found a majority of EVs are being sold in metro and regional areas, having calculated that approximately 43% of new EVs sold were in outer metropolitan areas, 39% were in inner metropolitan areas, and the remaining 18% were in regional and rural areas¹³. While the Electric Vehicle Council was encouraged to see a wide range of Australians, from across the country, getting benefits from owning an EV, they recognised there is still some more work to be done to support all communities in making the switch. This included continuing to support the build out a national network of public chargers.

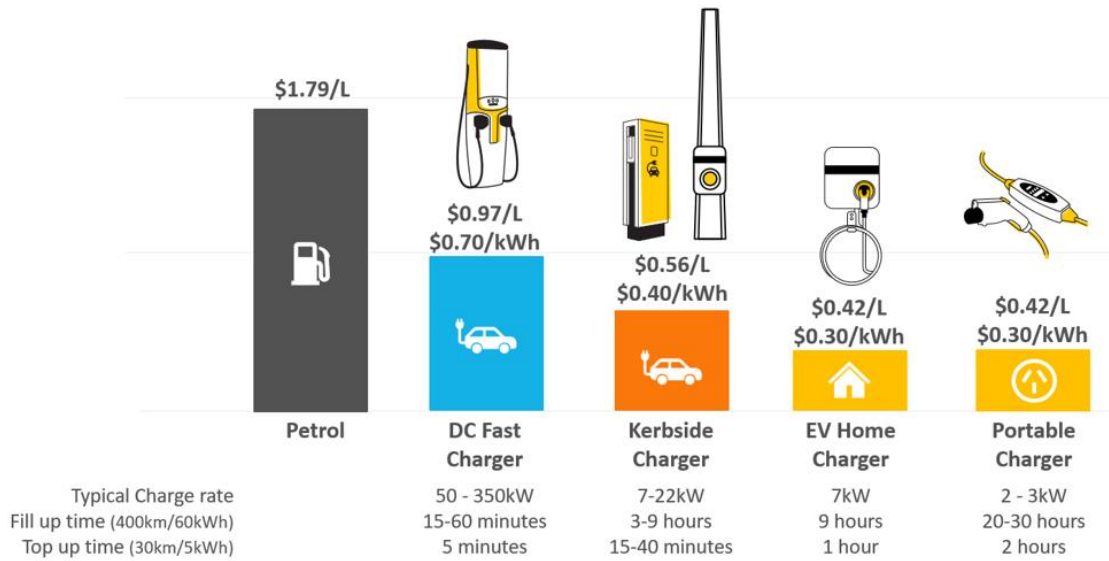
The Royal Automobile Association of South Australia (RAA) has almost completed installing a network of more than 500 chargers across about 140 sites in South Australia, using a \$12 million grant from the South Australian government. The RAA charging network provides a range of destination (7kW) and rapid (150kW) and ultra-rapid (200kW) charging sites. The destination (7kW) chargers provide a cheaper charging alternative where fast charging is not required, taking several hours to fully charge a car. Most of the RAA destination chargers are located near tourist parks and accommodation providers.

The availability of low-cost charging solutions is an important factor in considering EV uptake, where the lack of affordable charging options is likely to be an impediment to EV uptake for some customers. Figure 4 provides a comparison of the expected costs of each charging option. We note, home charging will almost always be the cheapest EV charging method but is not accessible to everyone. Kerbside charging will be essential for serving customers who cannot charge at home, for example many renters and homes without off-street parking. While the rollout of the fast-charging network in South Australia is progressing, the commercial rollout of kerbside EV charging is slow and likely to only focus on the most commercially viable locations.

¹² Electric Vehicle Council of Australia

¹³ Electric Vehicle Council – Australian Electric Vehicle Industry Recap 2023, 14 March 2024, page 8.

Figure 4: Comparison of rates for each EV charging option



While we continue to support commercial providers in connecting additional EV chargers in South Australia, there are emerging issues where it is not yet economic to provide EV charging infrastructure in some locations due to low EV density. However, the lack of EV chargers is an inhibiting factor for some customers in transitioning to EVs. This presents a cyclical conundrum during the early stages of the EV transition.

Noting this, SA Power Networks has been engaging with the South Australian Government and other stakeholders around our ability to provide an EV charging of last resort service. This last resort service would be predominantly focused on the delivery of kerbside EV charging, in situations where the necessary charger cannot be efficiently supplied by the competitive market.

We are proposing to classify the EV charging of last resort service as a Direct Control Service and further classified as an ACS. Noting the emerging nature of this service, an alternative control classification will provide increased transparency, for both customers and contestable EV charging providers.

4.2.2 Nature of service be provided

SA Power Networks proposes to offer to provide an EV charging of last resort service in the 2025-30 period. This service would only be provided on request and, as an ACS (quoted service), would be fully paid for by the requesting customer. The customer is free to seek and accept alternative quotes from third parties. We anticipate the services provided by third parties in the contested market will evolve over time as the market matures. Noting this, each EV charging installation will be considered on a case-by-case basis, with SA Power Networks only providing the specific charge point infrastructure where it is not able to be delivered contestably. We also propose, for each charge point location, to test the market at the end of life of the charging asset (expected 5 years), to ascertain third party interest to take over that charging point and enhance the transition to contestability where possible. This ensures the service provided by SA Power Networks continues to be a provider of last resort service.

Where provided, the EV charger of last resort service would include the installation, ownership, and maintenance of EV charging infrastructure through to the point of supply (external charging connection point). For kerbside charging, the EV charger would typically be installed on SA Power Networks' existing infrastructure (for example stobie poles or streetlight columns). Where there is no existing infrastructure available the charger may be freestanding. The connection point for the service will be at the load side of

the output terminals of the EV charger. We expect the metering would be integrated¹⁴ into the EV charger, measuring the demand and energy output of the EV charger.

The EV charging infrastructure provided by SA Power Networks will be on the network-side of the connection point. SA Power Networks will provide the infrastructure to provide energy to the connection point (charging point), with the sale of electricity to the end use customer provided by the retailer or charge point operator.

The EV charging equipment would form part of SA Power Networks distribution network, where SA Power Networks will service and repair the EV charger (for example attending to faults) to ensure the ongoing operation of the EV charging infrastructure over the life of the asset. At the end of life, SA Power Networks would only replace or upgrade the EV charging infrastructure where a commercial provided alternative is not available.

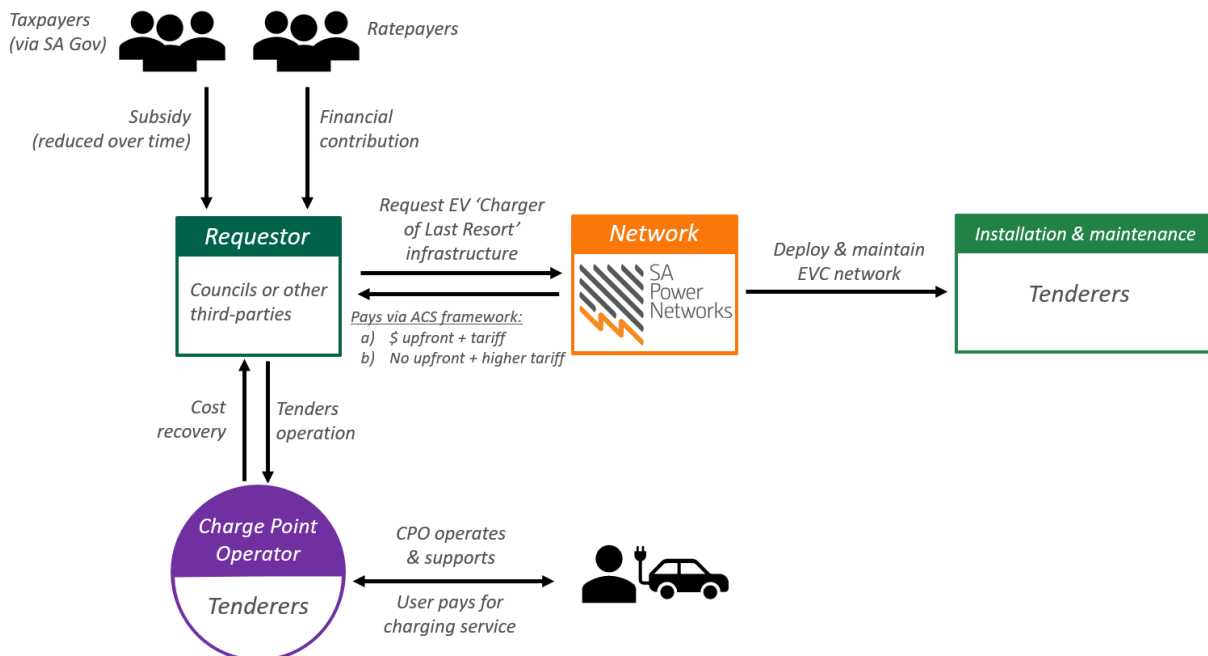
We consider this to be a distribution service, as the EV charging infrastructure will be provided by means of, or in connection with, SA Power Networks distribution system. In a similar way to SA Power Networks providing public lighting services to councils.

4.2.3 When would the service be provided

SA Power Networks will provide this service on request, where the requestor has been unable to obtain the EV charging services from the competitive market on reasonable terms.

Entities requesting the proposed service from SA Power Networks would have to demonstrate that they have actively tested the market for solutions. This could be by undertaking a public tender. If no commercial entity proposed a service, the requesting party could request the service from SA Power Networks. An example of the expected process is provided in Figure 5 below.

Figure 5: EV charging service request process



Where a public tender was not undertaken by the requesting party, SA Power Networks would advertise the need for services on its website. Noting the contestable nature of these services, commercial entities would be directed to contact the requesting party where they were interested in providing these services. At the

¹⁴ Refer to the AEMC’s recent rule change which enables participants to use in-built measurement capability in technology such as EV chargers [National Electricity Amendment \(Unlocking CER benefits through flexible trading\) Rule 2024 No. 15](#)

end of the advertised period, SA Power Networks will contact the requesting party to ascertain if they have received any market responses. Where no responses were received, the requesting party could request the service from SA Power Networks.

Once installed, SA Power Networks would continue to service the EV charger over the life of the asset. At end of life (expected 5 years), a market assessment would be undertaken to provide the option for a commercial EV charging provider to take over the provision of the EV charging service (i.e. the service would no longer be classified as a provider of last resort service). Where a commercial EV charging provider is available, the service would transition from SA Power Networks to the commercial provider, with SA Power Networks infrastructure replaced with their own infrastructure.

This process will ensure SA Power Networks provision of an EV charging of last resort service does not hinder the long-term growth of the EV charging market. The chargers installed by SA Power Networks are also likely to serve as a model for deployment of additional chargers by competitive providers. Noting the emerging nature of the service, Councils also supported this view, considering that SA Power Networks providing an EV charging of last resort service was more likely to facilitate market development rather than impede it.

4.2.4 Proposed classification

Since the consultation and release of the AER's final F&A for SA Power Networks, the landscape has undergone substantial changes. We estimate that there are presently around 10,000 EVs in South Australia, a significant increase from approximately 2,000 in 2022. The sale of EVs more than doubled in 2023.

The electrification of transport plays a crucial role in meeting the South Australian Government's climate objectives, with projections now indicating over 250,000 EVs on South Australian roads by 2030. To accommodate this surge in EV usage, an expansion of the current charging network will be necessary. SA Power Networks is continuing to engage with the South Australian Government about our ability of provide a 'last resort' EV charging service where it might be required to assist with this expansion.

We have also received support from councils for the availability of a 'last resort service', serving as a fallback option should they be unable to procure the required EV charging services from the contestable market.

Given the rapid growth in EVs in South Australia and broad support received from stakeholders for a provider of last resort service, we believe this constitutes a material change in circumstances that justifies departure from the final F&A published in July 2023.

This service will only be provided on a 'last resort basis', where the requestor is able to demonstrate they are not otherwise able to source a specific EV charging service from the contestable market.

We consider this service to be similar to Essential Energy's 'Provider of last resort services' classified as ACS in its 2019-24 regulatory determination. While these services are in respect of services able to be provided under the NSW Accredited Service Providers (**ASP**) scheme and can be provided by the contestable ASP market, there is also a need for a 'provider of last resort service' to ensure the effective supply of these services in areas where no other service provider is willing to offer the services at a reasonable price and/or reasonable terms. For the proposed EV charger of last resort services, we propose similar controls will be in place to ensure that the service is only provided where it is unable to be provided by the contestable market.

We note the AER in its final decision on Essential Energy's 2017 ring-fencing waiver application, stated they did not think it appropriate to provide Essential Energy with the discretion to decide if and where it should operate as a service provider of last resort¹⁵. Instead, considering an ACS classification is better suited to services where competition is developing.

¹⁵ AER Decision – DNSP applications for waivers from the Electricity Distribution Ring-fencing Guideline, December 2017, page 84

An alternative control classification will provide increased transparency, for both customers and contestable EV charging providers. As ACS, we propose to charge this service on a quoted service basis to the requesting customer, where the quotation will be developed in accordance with our approved quoted services formula.

The service is a distribution service as the EV charging infrastructure will be provided by means of, or in connection with, SA Power Networks distribution system. Further, the EV charging infrastructure is associated with the conveyance, and controlling the conveyance of electricity to an end use customer. This is the definition of a network service in the NER which is a distribution service. We think a direct control service classification is more appropriate than a negotiated distribution service classification as this enables SA Power Networks to provide this service in an effective and efficient manner with greater price certainty for customers. It also avoids the additional complication of having to comply with the AER’s Ring-fencing Guideline, which is likely to increase SA Power Networks costs to deliver a charger of last resort service.

The service would only be provided on request from councils or other parties and would not prevent other parties from also providing a kerbside charging service. This service will be provided to an identifiable customer, to whom the costs of providing the service are directly attributable. A classification of ACS is not expected to add any additional administrative costs for SA Power Networks, customers or the AER.

Accordingly, our Revised Proposal requests the AER classify this new service as an ACS for the 2025-30 period. As an ACS, the cost of providing this service will be funded in full by the requesting party.

4.2.5 Response to AER’s consultation questions

In this section we specifically address the questions posed by the AER in its Draft Decision.

To assist in forming our views, we posed number of questions to councils in relation to EV charging for discussion at our Public Lighting Forum¹⁶, held on 22 October 2024. We focussed our consultation on the areas where councils could provide meaningful feedback, noting their limited understanding of the regulatory environment. We consulted on the following areas:

- the key challenges to EV take-up in SA,
- the need for an EV charging of last resort service to be available,
- its likely impact on the development of the competitive market, and
- how the service should be funded, i.e. funded by the requesting party or by all customers.

While many councils had not yet considered their involvement in the provision of EV charging infrastructure, other councils were more developed in their thinking. These councils fully supported having an EV charging of last resort service available should they require it, acknowledging there is an existing gap in the market. One council contacted us directly after the forum to specifically support and reinforce the need for this service.

There was broad agreement that the existence of an EV charging of last resort service would not inhibit the development of the contestable EV charging market, with a few participants indicating they expected it would enable the development of the market long term. Councils were comfortable that the market testing requirements will ensure that the service is only provided by SA Power Networks where it is unable to be sourced from the competitive market.

¹⁶ The Public Lighting Forum was held on 22 October 2024, with all councils invited to attend either in person or on-line. It was attended by representatives of 16 councils (a mix of metropolitan and regional), the Department of Infrastructure and Transport and the Local Government Association. Noting this is a public lighting forum, we provided them advance notice of the agenda and our intention to also discuss EV charging at this forum. Council representatives attending the public lighting forum tend to be responsible for public lighting as well as other infrastructure arrangements such as street furniture and EV charging.

While councils generally agreed that additional government grant funding would be required to support the installation of EV charging infrastructure, they broadly supported that the infrastructure should be funded by the requesting party. This would ensure that councils who are not interested in deploying EV charging infrastructure are not funding these installations. This would also allow the installation to be considered on a council by council and charger by charger basis, where only some chargers may need to be delivered as a ‘last resort’.

Should DNSPs be involved in the provision of EV charging services including EV charging services of last resort?

Accessibility to reliable charging infrastructure is a crucial element in promoting growth of EV ownership in South Australia. Although the competitive market is expected to gradually supply EV charging infrastructure, we predict a significant gap in the market over the 2025-30 RCP. During this period, third-party providers may deem it financially unviable to establish EV charging facilities in certain areas. Stakeholders have expressed concerns about the lack of kerbside charging, a vital component in offering affordable charging solutions for customers who cannot charge at home.

SA Power Networks proposes to provide EV charging infrastructure in instances where the competitive market fails to do so, acting as a ‘last resort’. This last resort service would primarily concentrate on providing kerbside EV charging, where these chargers would be installed on SA Power Networks’ existing infrastructure (for example stobie poles or streetlight columns).

SA Power Networks is well placed to deploy the EV charging infrastructure on our assets in a cost-effective and efficient way, ensuring a beneficial outcome for our customers. We have an extensive workforce located across the state, equipped with the skills to construct, maintain, and manage the EV charging infrastructure alongside our existing distribution assets.

We have received support from the RAA and councils for an EV charging of last resort service, enabling SA Power Networks to provide requested charging infrastructure on a case-by-case basis where it is not otherwise able to be provided by the contestable market.

Do you think EV charging services should be classified as a distribution services under the existing rules? Why?

We consider the provision of EV charging infrastructure to be a distribution service, as this infrastructure will be provided by means of, or in connection with, SA Power Networks distribution system. In addition, as highlighted above, the EV charging infrastructure satisfies the NER network service definition as it is associated with the conveyance and controlling the conveyance of electricity through a network¹⁷. Kerbside EV chargers would be installed on SA Power Networks’ existing infrastructure (for example stobie poles or streetlight columns), therefore could be considered an extension of the distribution network and as such classified as such.

The connection point for the service will be at the load side of the output terminals of the EV charger. We expect the metering would be integrated¹⁸ into the EV charger, measuring the demand and energy output of the EV charger.

¹⁷ The NER defines a network as the apparatus, equipment, plant and buildings used to convey, and control the conveyance of, electricity excluding any connection assets. In relation to a Network Service Provider, a network owned, operated or controlled by that Network Service Provider.

¹⁸ Refer to the AEMC’s recent rule change which enables participants to use in-built measurement capability in technology such as EV chargers [National Electricity Amendment \(Unlocking CER benefits through flexible trading\) Rule 2024 No. 15](#)

The EV charging infrastructure provided by SA Power Networks will be on the network-side of the connection point. SA Power Networks will provide the infrastructure to provide energy to the connection point (charging point), with the sale of electricity to the end use customer provided by the retailer or charge point operator.

This is similar to how SA Power Networks delivers public lighting services to councils.

Would enabling DNSPs to provide EV charging services assist in the transition towards higher EV penetration?

Councils unanimously agreed that extension of the EV charging network, including provision of kerbside chargers, is necessary to support an increased uptake of EVs in South Australia. They endorsed the availability of an EV charging of last resort service, where SA Power Networks could provide this service in instances where the market fails to do so.

The Australian EV market needs significant growth to align EV adoption with our climate targets. One of the biggest enablers of EV uptake is the development and expansion of the charging network, including the provision of affordable kerbside charging solutions. As the number and accessibility of charging stations rise, the convenience and feasibility of owning and operating an EV becomes more attainable for a larger number of customers.

Allowing DNSPs like SA Power Networks to provide EV charging services as ‘a last resort’ would support higher EV penetration, providing charging solutions where these might not otherwise be financially viable for a competitive provider. Our proposed EV charging service of last resort will primarily focus on the delivery of kerbside charging solutions which would be delivered alongside SA Power Networks’ existing distribution network. These kerbside chargers will be fixed to stobie poles or streetlight columns where they are available.

SA Power Networks has the technical expertise and resources to manage the installation of the kerbside chargers and their ongoing maintenance across the state. We have a deep understanding of the electricity grid and can manage the integration of EV charging into the grid in a way that minimises disruptions, leading to an improved customer and community experience.

Would enabling DNSPs to provide EV charging services inhibit market entry and the development of competition in this emerging market?

SA Power Networks raised this question specifically with councils at our Public Lighting Forum on 22 October 2024. There was broad agreement that the presence of a last resort EV charging service would not inhibit the growth of the competitive EV charging market. A few participants suggested that it could facilitate the market long term development. Councils were confident that the market testing requirements proposed would guarantee that SA Power Networks only provides the charging services where it cannot be procured from the competitive market.

SA Power Networks proposes to only provide this EV charging service where the competitive market is unable or unwilling to provide them. Controls will be in place to ensure the individual EV charger requests have first been offered to the market for delivery, ensuring the service is only provided as a last resort. We also propose to do a market assessment at end of life of the asset to enable a commercial EV charging provider to take over the provision of the EV charging service at this time.

If the AER were to allow the provision of EV charging services in this upcoming regulatory control period, which avenue do you think would be most appropriate – via a ring-fencing waiver, or as a classified distribution service? And why?

We consider this service is similar to Essential Energy’s ‘provider of last resort’ service, where they can provide services in regional and remote locations under the NSW Accredited Service Provider (ASP) scheme (contestable market) where the customer is unable to source an ASP to complete this work. In its Ring-

fencing waiver decision, the AER indicated an ACS classification is better suited to services where competition is developing¹⁹.

Noting this, we propose for the service to be classified as a Direct Control Service, and further classified as ACS. An ACS classification will provide greater transparency, for both customers and contestable EV charging providers. As ACS, we propose to charge this service on a quoted service basis, where the quotation will be developed on a full cost recovery basis in accordance with our approved quoted services formula.

If the AER were to include EV charging services of last resort as a classified distribution service, what form of regulation should be applied?

As discussed above, we consider the EV charging of last resort service should be classified as a Direct Control Service, and further classified as ACS.

Do you think a material change in circumstances has occurred, since our final F&A decision for SA Power Networks, such that the AER could now classify EV charging services as part of its final revenue determination? What is that material change in circumstances, and why does it justify a change to classify the envisaged EV Charger Service of Last Resort as a distribution service in this distribution determination?

The landscape has changed significantly since the consultation on and publication of the AER's final F&A for SA Power Networks. There are presently around 10,000 EVs in South Australia, a significant increase from approximately 2,000 in 2022. The South Australian Government has also predicted over 250,000 EVs on South Australian roads by 2030.

SA Power Networks is continuing to engage with the South Australian Government about our ability of provide a 'last resort' EV charging service where it might be required to assist with this expansion. We have also received direct requests from councils to assist with the installation of EV charging infrastructure where they are unable to procure the service in the contestable market.

Given the rapid growth in EVs in South Australia and broad support received from stakeholders for a provider of last resort service, we believe this constitutes a material change in circumstances that justifies departure from the final F&A published in July 2023.

¹⁹ AER Decision – DNSP applications for waivers from the Electricity Distribution Ring-fencing Guideline, December 2017, page 84

Appendix A – SA Power Networks’ proposed service classification (Mark-up)

This service classification table has been marked-up against the baseline service classification table as provided within Appendix A of the AER’s Final Framework and approach.

Service group	Further description	Current classification 2020–25	Proposed classification 2025–30
Common distribution service – use of the distribution network for the conveyance/flow of electricity (including the services relating to network integrity)			
Common distribution service	<p>The suite of activities that includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> the planning, design, repair, maintenance, construction, and operation of the distribution network the relocation of assets that form part of the distribution network but not relocations requested by a third party (including a customer) ongoing inspection of private electrical works (not part of the shared network) required under legislation for safety reasons works to fix damage to the network (including emergency recoverable works caused by a customer or third party) support for another network during an emergency event procurement and provision of network demand management activities for distribution or system reliability, efficiency or security purposes Provision of standardised data sets and/or data that is provided to a distributor, at no cost to the distributor, in accordance with obligations under the Rules. training internal staff and contractors delivering direct control services activities related to ‘shared asset facilitation’ of distributor assets²⁰ emergency disconnect for safety reasons and work conducted to restore a failed component of the distribution system to an operational state upon investigating a customer outage bulk supply point metering – activities relating to monitoring the flow of electricity through the distribution network. rectification of simple customer fault (e.g. fuse) relating to a life support customer or other critical health and safety issues that the distributor is able to address Rectification of simple customer faults where: 	SCS	SCS

²⁰ Revenue for these services is charged to the relevant third party and is treated in accordance with the shared asset guideline. 'Shared asset facilitation' refers to administrative costs of providing the unregulated service.

Service group	Further description	Current classification 2020–25	Proposed classification 2025–30
	<ol style="list-style-type: none"> 1. the need for rectification work is discovered in the course of the provision of distribution services 2. the work performed is the minimum required to restore safe supply 3. the work can be performed in less than thirty minutes and does not normally require a second visit. <ul style="list-style-type: none"> • establishment and maintenance of national metering identifiers (NMIs) in market and/or network billing systems, and other market and regulatory obligations • investigation of customer-reported network faults • work related to a regulated stand-alone power system (SAPS) deployment, operation and maintenance (including fault and emergency repairs)²¹, and customer conversion activities. <p>Such services do not include a service that has been separately classified including any activity relating to that service.</p>		
Connection Services—services relating to the electrical or physical connection of a customer to the network²²			
Basic connection services	<p>Means a connection service related to a connection (or a proposed connection) between a distribution system and a retail customer’s premises (excluding a non-registered embedded generator’s premises) in the following circumstances:</p> <p>(a) either:</p> <ol style="list-style-type: none"> (1) the retail customer is typical of a significant class of retail customers who have sought, or are likely to seek, the service; or (2) the retail customer is, or proposes to become, a micro embedded generator; and <p>(b) the provision of the service involves minimal or no augmentation of the distribution network; and</p> <p>(c) a model standing offer has been approved by the AER for providing that service as a basic connection service.</p>	Premises Connections = SCS + customer contributions	Premises Connections = SCS + customer contributions
Standard connection services	<p>Means a connection service (other than a basic connection service) for a particular class (or sub-class) of connection applicant and for which a model standing offer has been approved by the AER.</p>	Premises connections = ACS Extensions & Augmentations = SCS + customer contributions	Premises connections = ACS Extensions & Augmentations = SCS + customer contributions

²¹ Includes simple customer fault rectification on generation service of regulated SAPS.

²² Applies to both NER chapter 5 and 5A connections.

Service group	Further description	Current classification 2020–25	Proposed classification 2025–30
Negotiated connection services	Means a connection service (other than a basic connection service) for which a DNSP provides a connection offer for a negotiated connection contract.	Premises connections = ACS Extensions & Augmentations = SCS + customer contributions	Premises connections = ACS Extensions & Augmentations = SCS + customer contributions
Enhanced ²³ connection services	Other or enhanced connection services provided at the request of a customer or third party that include those that are: <ul style="list-style-type: none"> • Provided with higher quality of reliability standards, or lower quality of reliability standards (where permissible) than required by the NER or any other applicable regulatory instruments; • In excess of levels of service or plant ratings required to be provided by SA Power Networks; or • Other additional customer dedicated connection lines/assets. 	ACS	ACS
Connection application and management services	Works initiated by a customer or retailer which are specific to the connection point. Includes, but is not limited to: <ul style="list-style-type: none"> • connection application related services • de-energisation • re-energisation • temporary connections (of a size less than the shared network augmentation threshold) as a basic connection service e.g. builder’s supply, fetes, etc. • remove or reposition connection • overhead service line replacement – customer requests the existing overhead service to be replaced (e.g. as a result of a point of attachment relocation). No material change to load • protection and power quality assessment • supply enhancement (e.g. upgrade from single phase to three phase) • customer requested change requiring secondary and primary plant studies for safe operation of the network (e.g. change protection settings) • upgrade from overhead to underground service • rectification of illegal connections or damage to overhead or underground service cables 	ACS	ACS

²³ Applies to both NER chapter 5 and 5A connections and includes enhancements for both consumption and export services.

Service group	Further description	Current classification 2020–25	Proposed classification 2025–30
	<ul style="list-style-type: none"> calculation of a site specific distribution loss factor on request in respect of a generating unit up to 10 MW or a connection point for an end-user with actual or forecast load up to 40 GWh per annum capacity, as per clause 3.6.3(b1) of the NER power factor correction. 		
Metering Services²⁴ —activities relating to the measurement of electricity supplied to and from customers through the distribution system (excluding network meters)			
Type 1 to 4 metering services	Type 1 to 4 metering installations and supporting services are competitively available.	Unregulated	Unregulated
Type 5 and 6 meter installation and provision (prior to 1 December 2017)	Recovery of the capital cost of type 5 and 6 metering equipment installed (including metering with internally integrated load control devices).	ACS	SCS
Type 5 and 6 meter maintenance, reading and data services (legacy meters)	Activities include: <ul style="list-style-type: none"> Meter maintenance covers works to inspect, test, and maintain metering installations. Meter reading refers to quarterly or other regular reading of a metering installation including field visits and remotely read meters. Metering data services includes for example: services that involve the collection, processing, storage and delivery of metering data, the provision of metering data in accordance with regulatory obligations, remote or self-reading at difficult to access sites, and the management of relevant NMI Standing Data in accordance with the NER. 	ACS	SCS
Type 7 metering services	Administration and management of type 7 metering installations in accordance with the NER and jurisdictional requirements. Includes the processing and delivery of calculated metering data for unmetered loads, and the population and maintenance of load tables, inventory tables and on/off tables.	SCS	SCS
Auxiliary metering services (Type 5 to 7 metering installations)	Activities include: <ul style="list-style-type: none"> Off-cycle meter reads for type 5 and 6 meters. Requests to test, inspect and investigate, or alter an existing type 5 or 6 metering installation. Testing and maintenance of instrument transformers for type 5 and 6 metering purposes. Type 5 to 7 non-standard metering services. Works to re-seal a type 5 or 6 meter due to customer or third party action (e.g. by having electrical work done on site). Change distributor load control relay channel on request that is not a part of the initial load control installation, nor part of standard asset maintenance or replacement. 	ACS	ACS

²⁴ SA Power Networks will continue to be responsible for type 5 and 6 meters until they are replaced (and entitled to levy associated charges). We refer to these meters as ‘legacy meters’. New meters (that will be type 1 to 4 meters) installed from 1 December 2017 are referred to as ‘contestable meters’.

Service group	Further description	Current classification 2020–25	Proposed classification 2025–30
Emergency supply restoration in relation to metering equipment not owned by the distributor (contestable metering)	Customer or third party request to restore power to a customer’s premises due to metering equipment not owned by the distributor.	ACS	ACS
Meter recovery and disposal – type 5 and 6 (legacy meters)	<p>Activities include the removal and disposal of a type 5 or 6 metering installation:</p> <ul style="list-style-type: none"> • At the request of the customer or their agent, where an existing type 5 or 6 metering installation remains installed at the premises and a replacement meter is not required. • At the request of the customer or their agent, where a permanent disconnection has been requested where it has not been removed and disposed of by the incoming metering provider. 	ACS	ACS
Third party requested outage for purposes of replacing a meter	At the request of a retailer or metering coordinator provide notification to affected customers and facilitate the disconnection/reconnection of customer metering installations where a retailer planned interruption cannot be conducted.	ACS	ACS
Network ancillary services – Customer and third party initiated services related to common distribution services			
Access permits, oversight and facilitation	<p>Activities include:</p> <ul style="list-style-type: none"> • A distributor issuing access permits or clearances to work to a person authorised to work on or near distribution systems including high and low voltage. • A distributor issuing confined space entry permits and associated safe entry equipment to a person authorised to enter a confined space. • A distributor providing access to switch rooms, substations and other network equipment to a non-LNSP party who is accompanied and supervised by a distributor's staff member. May also include a distributor providing safe entry equipment (fall-arrest) to enter difficult access areas. • Specialist services (which may involve design related activities and oversight/inspections of works) where the design or construction is non-standard, technically complex or environmentally sensitive and any enquiries related to distributor assets. • Facilitation of generator connection and operation on the network. • Facilitation of activities within clearances of distributor’s assets, including physical and electrical isolation of assets. 	ACS	ACS

Service group	Further description	Current classification 2020–25	Proposed classification 2025–30
Network safety services	<p>Examples include:</p> <ul style="list-style-type: none"> • provision of traffic control and safety observer services by the distributor where required²⁵ • fitting of tiger tails or aerial markers²⁶ • high load escorts • third party request for de-energising wires for safe approach • Customer requested network inspection undertaken to determine the cause of a customer outage where there may be a safety and or reliability impact on the network or related component and associated works to rectify a customer caused impact on the network.²⁷ 	ACS	ACS
Sale of approved materials or equipment	Includes the sale of approved materials/equipment to third parties for connection assets that are gifted back to the DNSP become part of the shared distribution network.	ACS	ACS
Notices of arrangement and completion notices	<p>Examples include:</p> <ul style="list-style-type: none"> • Work of an administrative nature where a local council requires evidence in writing from the distributor that all necessary arrangements have been made to supply electricity to a development. This includes but not limited to: receiving and checking subdivision plans, copying subdivision plans, checking and recording easement details, site visits, assessing supply availability, liaising with developers if errors or changes are required, and preparing notifications of arrangement. • Provision of a completion notice (other than a notice of arrangement). This applies where the real estate developer requests the distributor to provide documentation confirming progress of work. Usually associated with discharging contractual arrangements (e.g. progress payments) to meet contractual undertakings. 	ACS	ACS
Rectification works to maintain network safety	Activities include issues identified by the DNSP and work involved in managing and resolving pre-summer bushfire inspection customer vegetation defects or aerial mains where the customer has failed to do so.	ACS	ACS
Customer requested planned interruption	<p>Examples include:</p> <ul style="list-style-type: none"> • Where the customer requests to move a distributor planned interruption, and agrees to fund the additional cost of performing this distribution service outside of normal business hours. • Customer initiated network outage (e.g. to allow customer and/or contractor to perform maintenance on the customer’s assets, work close to or for safe approach, which impacts other networks users). 	ACS	ACS

²⁵ When provided in relation to the distribution system or future distribution system.

²⁶ As requested by a customer or directed by the Office of Technical Regulator.

²⁷ An ACS charge is not applicable where it is determined that the customer outage was caused by a fault on the network.

Service group	Further description	Current classification 2020–25	Proposed classification 2025–30
Attendance at customers' premises to perform a statutory right where access is prevented	A follow up attendance at a customer's premises to perform a statutory right where access was prevented or declined by the customer on the initial visit. This may include the costs of arranging, and the provision of, a security escort or police escort (where the cost is passed through to the distributor).	ACS	ACS
Inspection and auditing services	<p>Activities include:</p> <ul style="list-style-type: none"> • inspection and reinspection by a distributor of gifted assets or assets, installed by a third party • investigation, review and implementation of remedial actions that may lead to corrective and disciplinary action of a third party service provider due to unsafe practices or substandard workmanship • auditing of a third party service provider's work practices in the field • after hours examination and/or testing of the consumer mains and main switchboard prior to initial energisation (upon request) • after hours visual examination of an electrical installation to reconnect it to a source of electricity (upon request) • re-test at a customer's installation, where the installation fails the initial test, and cannot be connected or has been disconnected for more than 12 months or disconnected for safety reasons. 	ACS	ACS
Provision of training to third parties for network related access	Training services provided to third parties that result in a set of learning outcomes that are required to obtain a distribution network access authorisation specific to a distributor's network. Such learning outcomes may include those necessary to demonstrate competency in the distributor's electrical safety rules, to hold an access authority on the distributor's network and to carry out switching on the distributor's network. Examples of training might include high voltage training, protection training or working near power lines training.	ACS	ACS
Authorisation and approval of third party service providers design, work and materials	<p>Activities include:</p> <ul style="list-style-type: none"> • Authorisation or re-authorisation of individual employees and subcontractors of third party service providers and additional authorisations at the request of the third party service providers (excludes training services). • Acceptance of third party designs and works. • Assessing an application from a third party to consider approval of alternative material and equipment items that are not specified in the distributor's approved materials list. 	ACS	ACS
Security lights	<p>Provision, installation, operation and maintenance of equipment mounted on distribution equipment used for security services, e.g. nightwatchman lights</p> <p>Note: excludes connection services.</p>	ACS	ACS

Service group	Further description	Current classification 2020–25	Proposed classification 2025–30
Customer initiated or triggered network asset relocations/re-arrangements	Relocation of assets that form part of the distribution network in circumstances where the relocation was initiated by a third party (including a customer), or triggered by a customer's non-compliance with network safety or security standards (such as network encroachments).	ACS	ACS
Provision of electricity network data	Activities include: <ul style="list-style-type: none"> Data requests by customers or third parties for the provision of electricity network data beyond standardised data sets or obligations under the Rules. Additional services related to network data requests including provision of advice and interpretation. 	ACS	ACS
Third party funded network alterations or other improvements	Alterations or other improvements to the shared distribution network to enable third party infrastructure (e.g. NBN Co telecommunications assets) to be installed on the shared distribution network. This does not relate to upstream distribution network augmentation.	ACS	ACS
EV charging of last resort	Includes provision, construction and maintenance of EV charging infrastructure requested by a third party, where these services are unable to be reasonably procured from the contestable market.	-	ACS
Public Lighting Services - lighting services provided in connection with a distribution network			
Public Lighting	Includes provision, construction and maintenance of public lighting and emerging public lighting technology.	ACS	ACS
Unregulated Distribution Services - (non-exhaustive list)			
Distribution asset rental	Rental of distribution assets to third parties (e.g. office space rental, pole and duct rental for hanging telecommunication wires etc.).	Unregulated	Unregulated
Contestable metering support roles	Includes metering coordinator, (except where the distributor is the initial metering coordinator) metering data provider and metering provider for meters installed or replaced after 1 December 2017.	Unregulated	Unregulated
Type 5 and 6 meter data management to other electricity distributors	The provision of type 5 and 6 meter data management to other electricity distribution network service providers.	Unregulated	Unregulated
Provision of training to third parties for work not associated with common distribution services nor network services	Training programs provided to third parties for non-network related issues	Unregulated	Unregulated

Glossary

Acronym / term	Definition
ACS	Alternative Control Services
AEMC	Australian Energy Market Commission
AER	Australian Energy Regulator
ASP	Accredited Service Provider
DNSP	Distribution Network Service Provider
EV	Electric vehicle
F&A	Framework and Approach
Guidance Note	Legacy metering services - guidance note
NER	National Electricity Rules
NERR	National Energy Retail Rules
NMI	National Metering Identifier
RCP	Regulatory Control Period
RIN	Regulatory Information Notice
SCS	Standard Control Services