

16 September 2019

Australia, State and Territory and New Zealand Governments

SUBMISSION – CONSULTATION ON ‘SMART’ DEMAND RESPONSE CAPABILITIES FOR SELECTED APPLIANCES

Introduction and Overview

1. This submission is made by [Drive Electric Incorporated](#) (DE). DE represents a [member](#) base comprising new car OEMs, used car importers and distributors, infrastructure organisations (electricity generators, distributors and retailers, electric vehicle service equipment suppliers) and electric vehicle users, and is an advocacy organisation for the uptake and mainstreaming of electric vehicles (EVs) in New Zealand, as well as decarbonizing transport, and consequently seeing NZ become more energy independent.
2. DE has brought together feedback from a short survey of key questions we canvassed with our financial members using the ‘Get Feedback’ survey tool. Those participating represent all aspects of the converging EV industry. Our submission is formed from these responses.

Responses to Surveyed Questions:

1. *Do you support the proposal to mandate compliance with AS/NZS 4755 for the nominated priority appliances?*

The majority of our member organisations responded in support of the proposal noting that Demand Response Capability in EV chargers will be required in order to implement managed charging; this will be important to help EDBs to manage peak loads.

2. *Do you support permitting compliance with either AS/NZS 4755.3 or (DR) AS 4755.2?*
All the members who responded were in support in order to manage the network better and reduce consumer costs.

3. *Do you support requiring compliance with all Demand Response Modes (DRMs)?* The majority of members were in support of this, some noting that only DRM modes 0, 1, 2 and 3 should be required.

4. *Do you agree with the scope of the proposal with regard to the charge/discharge controllers for electric vehicles (SAE Level 2 or IEC Mode 3).*

The majority were in agreement with the scope.

If not, what products (or capacity limits) would you propose be included or excluded, and why?

Feedback for those who answered ‘no’ made the point that charge/discharge controllers are a good idea in principle but noted that it is more important to offer the vehicle owners the proper price signals in order for them to make their own decisions whether and/or when to participate.

5. *What implications (positive or negative) would the proposals have for your industry, in terms of activity, profitability and employment?*

Feedback from the membership was positive, noting that requiring EV chargers to have DRM capability will allow the Electricity industry to plan for and manage the expected rapid uptake of EVs.

The overarching response to the consultation paper from Drive Electric members was positive, members having a specific lens on electric mobility. If you require any further information from NZ leaders across this converging industry, Drive Electric would be happy to assist in any way required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Gilbert', with a large, stylized initial 'M'.

Mark Gilbert
Chairman, DRIVE ELECTRIC INCORPORATED