

Pathways Call for Evidence Submission

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Submission to the NSW Net Zero Commission

Decarbonisation Pathways — Call for Evidence

Submitted to	NSW Net Zero Commission
Consultation	Decarbonisation Pathways — Call for Evidence
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Confidentiality	None claimed. This submission may be published in full.
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Acknowledgement of Country

AJMG Solutions acknowledges the Traditional Custodians of the lands and waters across New South Wales on which this work is carried out, and pays respect to Elders past and present. We acknowledge the Gadigal people of the Eora Nation, on whose Country our office stands, and recognise the continuing role of First Nations peoples in caring for Country through the energy transition.

About this submission

AJMG Solutions is a boutique strategic advisory firm specialising in transport electrification, public EV charging infrastructure, battery storage and DC microgrids, and public-sector procurement. We offer these comments from three vantage points rarely combined in one contributor: operating experience inside a commercial kerbside charge point operator, current council-side delivery experience, and behind-the-meter infrastructure experience.

For transparency: our founder, Andrew Giannasca, was the first employee of JOLT, an Australian-founded kerbside charge point operator, and worked on the rollout of its Australian network. He no longer works with JOLT in any capacity but continues to hold a minority equity interest in the company. AJMG's current work is principally council-side, advising councils across New South Wales, Victoria, Queensland and South Australia on kerbside charging strategy, planning integration and procurement readiness, with a meaningful share of that work in regional NSW. Some of those councils are eligible for NSW Government kerbside charging support, so we have a commercial interest in the continued growth of council-side kerbside work and should be read with that in mind. We separately advise on battery storage and microgrid scope for a construction joint venture delivering in a NSW Renewable Energy Zone.

We therefore have an interest in the growth of kerbside charging generally rather than in any particular operator or delivery model, and we offer these views as informed, disclosed industry experience rather than as a disinterested party. We are comfortable for this submission to be published in full. We take no position for or against network-led versus contestable delivery of charging. We have worked inside the contestable model and now advise on network-led and council-procured models alike; our interest is in good delivery, not in any one model prevailing.

We comment only on transport, and within transport only on light-vehicle charging infrastructure. Our comments on charging load shape also bear on the electricity and energy sector, under its focus area on electricity demand, load shifting and battery deployment. We do not comment on other sectors, on regulatory-accounting mechanics, or on the modelling methodology itself. Those are better addressed by others.

Summary position

Recommendation 3A of the Commission's 2026 Annual Progress Report calls on the NSW Government to enable and incentivise faster uptake of passenger and light commercial electric vehicles, including by ensuring a rapid build out of the statewide charging network. Separately, Recommendation 8C calls for supporting and resourcing councils to drive the local change necessary for the transition, and Recommendation 7A contemplates a financing strategy that accounts for the resourcing needs of local councils.

Our submission is essentially that these recommendations are more tightly coupled than they appear. For kerbside charging, the build out in Recommendation 3A is rate-limited by the council resourcing in Recommendation 8C. We do not think the Commission has drawn that link explicitly, and we think the pathway scenarios should.

1. The binding constraint on kerbside charging in NSW is not technology cost or driver demand. It is local government capacity, and the parking-policy decisions that sit underneath it. Charger cost curves are the wrong place to look for the rate limit on this part of the transport pathway.

2. The commercial gap is geographically specific. Commercially viable kerbside sites already exist, but too few of them do, and the coverage least likely to appear on its own is dispersed regional and outer-suburban, rather than the dense metropolitan and regional-city catchments where kerbside demand concentrates.
3. Deployment rate, not installed cost, is the input most worth getting right. We point to a published, observation-based benchmark below, with the caveats its authors attach to it.

Question 1(a) — Policies and market mechanisms: the barrier is council capacity

Both the Commission and the NSW Government have already identified this barrier. The Commission's Recommendations 7A and 8C address council resourcing directly. On the delivery side, the Council Capacity Building Funding Round, opened in March 2026, makes \$3 million available to 37 eligible councils on a non-competitive basis, capped at up to \$80,000 each, expressly to overcome capacity and capability constraints related to resourcing, planning policy and community engagement. It was designed after one-on-one meetings with councils and a targeted consultation in September 2025.

We are therefore corroborating an existing finding rather than reporting a new one. What we would add is that the constraint is more specific, and more consequential for the transport pathway, than a general resourcing observation implies. Since April 2026 we have run a structured outreach and discovery process directed at the 37 eligible councils. Where councils decline or defer, the reason is rarely disagreement about whether kerbside charging is needed. It is that no officer has the available hours to scope the work, run the procurement and carry it through committee alongside an existing workload. In our pipeline, warm conversations have more often resolved into deferrals into late 2026 and 2027 than into near-term action.

That is an observation from our own commercial pipeline, not a survey, and we offer it only as illustration of a constraint the Commission has already identified on its own evidence. The modelling consequence does not depend on our observation: if council resourcing is a real constraint on local delivery, as Recommendation 8C accepts, then a transport pathway that assumes kerbside deployment scales with charger economics will mis-time this segment. The queue does not form at the charger.

- Council capacity is worth treating as an explicit, adjustable input in the transport pathway rather than folding it into a general deployment-cost assumption. For kerbside charging, the distance between the Delayed and Fast tracked scenarios is plausibly more about local government resourcing than about anything happening to hardware prices.
- The capacity round is capped and one-off. Whether up to \$80,000 per council is sufficient, and whether capacity built in 2026 persists once the funding ends, seem to us reasonable things for the Commission to test.

Question 2(b) — Constraints on deployment: kerbside is a parking-policy problem first

Before it is an energy problem, kerbside charging is a parking-policy problem. Installing a public charger on a residential street requires a council to convert general parking to restricted or dedicated EV parking. Where parking is already contested, that is a politically consequential decision engaging residents, local businesses and elected councillors, and it generally cannot be delegated to the officer running the EV project. That is a large part of why the capacity constraint above bites so hard.

Recent UNSW research puts numbers on this. Analysis of 27,175 charging sessions over the six months to February 2026, across the council-owned kerbside network operated by Waverley, Woollahra and Randwick, found that providing a dedicated parking space per charging port increases the number of sessions by 229 per cent. The same work identifies 30 to 50 kW DC chargers with two-hour dedicated EV parking restrictions as a sweet spot: they can fully charge a typical EV within the restriction, are used more frequently than AC, are cheaper than ultra-fast alternatives, and delivered on average four times the energy of AC sites.

We would draw out an implication the authors do not state directly. If a DC charging space delivers roughly four times the energy of an AC space, comparable service can be provided from materially fewer dedicated bays. That bears directly on the parking trade-off a council has to make, and it means an AC-weighted charger assumption will overstate the kerb space a given pathway requires and understate achievable utilisation.

From our own operating experience inside a charge point operator, the pattern is familiar. The cost and elapsed time of enabling a site, including identifying it, securing council agreement, obtaining the connection and completing civil works, routinely defeats the commercial case before a single charging session is delivered. Hardware is rarely the deciding variable, and the planning and parking-approval pathway is a real constraint on deployment rate that sits entirely outside the energy system.

Questions 4(a) and 5 — Economic and workforce pressures, and where the commercial gap actually sits

NSW kerbside charging support has been targeted, by design, at areas with the least access to private off-street parking, selected on population density, dwelling type, housing tenure and vehicle ownership. That is a defensible design for the apartment and rental cohort, and the first two funding rounds have supported over 1,000 charge ports across 38 local government areas. It is worth being precise about what those criteria capture. They are not confined to metropolitan Sydney: higher-density regional cities such as Newcastle and Wollongong qualify on the same logic. What the criteria do largely exclude is the dispersed regional and outer-suburban fringe, where off-street parking is common but public charging coverage is thinnest.

The 2026 NSW Electric Vehicle Strategy acknowledges that other side, noting that while metropolitan charging networks have developed substantially, regional and remote communities face persistent gaps, and prioritising blackspot coverage including charging at least every 100 kilometres on major highways.

We would encourage the Commission to hold that distinction explicitly in the pathway design. Independent analysis has found that commercially viable kerbside sites already exist but that too few do, and has warned that highway-oriented fast charging risks aggravating metropolitan and regional divisions, with regional communities hosting infrastructure serving travellers passing through rather than residents. Our own regional experience is consistent with that, and suggests reliability rather than charger count is often the operative constraint: a single outage on a corridor without redundancy strands the trip.

The position we would offer is a gradient rather than a binary. The case for public funding strengthens as density falls, and is strongest where the commercial case does not exist at any plausible utilisation.

We should record a counter-argument to our own position, because we think it is a serious one and we have acknowledged it previously in submissions to the AEMC. A split model, in which competitive operators take the profitable sites and public funding covers the remainder, can raise long-run costs, because profitable sites no longer cross-subsidise unprofitable ones. On that reasoning, leaving the viable core entirely to the market may increase total public cost over time rather than reduce it. We do not think this defeats a gradient approach, but it does argue against a clean split. Our view is that public support should be weighted towards the fringe and towards corridor redundancy, while preserving mechanisms that let stronger sites support weaker ones, rather than partitioning the network into commercial and subsidised halves.

The enduring structural question, being the role of distribution networks in owning charging infrastructure and how that is funded, is being worked through in national forums including Package 1 of the Electricity Network Regulation Review, on a timeline that now extends well beyond this consultation. AJMG has deliberately not taken a side in that debate and does not do so here.

Question 6 — Evidence to inform pathway inputs and assumptions

We should be candid about what we can and cannot provide. Our founder's operating data from his time at a charge point operator is subject to confidentiality obligations and is not ours to supply, and we have not offered figures we cannot source publicly.

The most directly useful published input we can point the Commission and its modelling partners to is a deployment ratio from the UNSW eastern suburbs work: approximately one kerbside charging space for every 70 locally parked electric vehicles. Three points of precision matter. A charging space is defined as the lesser of the number of charging ports and the number of parking spaces, which is not the same as a port count. The denominator is vehicles parked locally, not vehicles registered locally, which the authors note is the more relevant measure. And the ratio is both descriptive and prescriptive in the source: the network has consistently maintained it as EV numbers grew, and the authors recommend maintaining it through the next phase of uptake.

It is a useful input because it converts an EV uptake trajectory into a kerbside infrastructure requirement directly. It should be used with the caveat its authors attach: the eastern suburbs have atypically strong kerbside demand, with 60 per cent of residents in apartments or townhouses and 50 per cent renting, and the authors suggest their quantitative results be treated as an upper bound on utilisation and profitability at current levels of EV uptake. We would apply the same caution to the ratio, and would expect a modeller to treat it as one anchor point requiring adjustment by catchment rather than a universal figure.

- Charger mix. Utilisation, bay requirements and unit economics differ enough between slow AC and 30 to 50 kW DC that treating kerbside charging as a single asset class will distort both cost and space requirements. We note the countervailing considerations: AC is cheaper per port and places comparatively negligible load on the network, so the right mix is likely to vary with dwell time and local network conditions rather than resolving uniformly in favour of DC.
- Enablement lead time, held separately from installed cost. The elapsed time from site identification to energisation, including council approval and grid connection, is in our experience a more binding rate limit than capital cost, and it is not visible in a cost curve.

Question 8 — Other comments

Two suggestions on the pathway design.

First, the transport pathway would be strengthened by treating local government as a named delivery actor carrying its own capacity constraint, rather than as part of the general policy environment. Councils control the kerb, the planning pathway, streetscape and asset considerations, and a large share of community acceptance. In this segment they are not simply a stakeholder to be consulted; they are the delivery bottleneck. A framework able to vary council capacity independently should give a more useful answer about what separates a delayed pathway from a fast-tracked one, and would make the link between Recommendations 3A and 8C visible in the modelling.

Second, and drawing on our behind-the-meter and microgrid work rather than our council work, the pathway should not treat kerbside charging load as fixed in shape. The UNSW analysis found that more than 30 per cent of charging load on the eastern suburbs network falls in the evening peak, at 32 per cent for AC and 37 per cent for DC, and its authors identify shifting demand away from grid peak hours as a priority for research and innovation. That matters for the pathway scenarios because the network reinforcement cost of a given kerbside deployment is a function of when the load lands, not only how much of it there is. Managed charging, tariff design and, at higher-power sites, local storage are all available levers, and a scenario that assumes unmanaged kerbside charging will overstate the network augmentation the transition requires. We would encourage the Commission to model charging load shape as a variable rather than an assumption.

We would be glad to provide further detail on any point, or council-side delivery observations as they accumulate.

Sources cited

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