3 September 2026

Energy Efficiency and Conservation Authority (EECA)

By email: star@eeca.govt.nz

Re: Consultation on Proposed energy flexibility regulatory requirements for electric vehicle chargers (EECA, July 2026)

Introduction

Drive Electric is New Zealand's primary apolitical, not-for-profit industry body dedicated to the mainstreaming of e-mobility. Founded in 2011, we represent more than 70 members spanning the full electric mobility ecosystem, including vehicle OEMs and distributors, energy generators, retailers and distribution businesses (lines companies), AC and DC charging infrastructure providers and Charge Point Operators, fleet and finance providers, and more.

Drive Electric welcomes the opportunity to comment on EECA's proposed technical requirements for EV chargers.

Summary of Position

Drive Electric supports the general direction of EECA's proposed rules. This consultation is the mechanism for a position we have already put on record: Manifesto 2026/2027 Recommendation 4.5 calls for all new dedicated charging installations to be Smart-Ready and aligned with EECA's smart charging mandating and labelling programme.

This position also reflects what we saw play out over 2025: 'dumb' (non-smart) chargers were, and continue to be, sold and bundled with new EVs by default, with consumers rarely informed of the smart charging alternative or its benefits. Without a mandate and clear labelling, we expect this pattern to continue — leaving consumers locked into hardware that can't participate in the emerging energy system, and unable to easily identify at point of purchase which chargers will set them up to capture that value. Our submission on MBIE's 2025 policy proposals (1 August 2025) made the same point, and we're glad to see the direction we recommended — Option 4A, smart functionality with labelling — reflected in the Government's April 2025 decision to regulate.

1. Scope (consultation paper Section 4.1, p.10 — Questions 1–4)

Drive Electric supports excluding DC, AC/DC combination, and above 23kW AC chargers from the initial rules (Section 4.1, p.10, Qs 1–2), consistent with our manifesto focus on home and work AC charging (Recommendations 4.3–4.5).

On bi-directional chargers (Q4, p.10), we support EECA's no-requirements-yet approach while the market and standards develop, noting our existing call for technology-neutral export standards for DERs including V2G (Recommendation 4.5). When requirements are developed, we would want them to address grid connection standards, safety disconnect mechanisms, export measurement capabilities, and grid services communication protocols.

2. Communication (Section 4.2, pp.11–12 — Questions 5–8)

Drive Electric supports a mandatory open, standardised communication protocol (e.g. OCPP 1.6+) with no forced intermediary (Section 4.2, p.11) — this reduces vendor lock-in and protects consumers if a supplier's platform is withdrawn.

We also support Q7 (p.12): chargers should be free to offer additional protocols beyond the compliant baseline, preserving room for innovation.

3. Product Response (Section 4.3, pp.13–15 — Questions 9–21)

Drive Electric supports the consumer-override requirement and the last-known-settings fallback if a charger is disconnected from the controlling system, subject to safety and overload exclusions (p.13) — both protect a consumer's ability to reliably charge.

We also support a randomised delay or ramp-rate limit to prevent simultaneous-load instability (p.14), adjustable by the connected system post-supply (Q21, p.15), given network capacity varies by region and EDB. But also note that we should remain open to the outcome being achieved in other innovative ways.

4. Data Capture (Section 4.4, pp.16–17 — Questions 22–26)

Drive Electric supports chargers making session start/end time and cumulative energy imported available to both the connected system and the end user after each session (p.16).

5. Cyber Security (Section 4.5, p.18 — no questions asked)

EECA notes it has no current mandate to set cyber security requirements for EV chargers (Section 4.5, p.18). Given the scale of connected, controllable load this regulation brings onto the network, we recommend EECA and the Electricity Authority commit to a defined forward work programme on charger cyber security.

As we noted in our submission on MBIE's 2025 proposals, the key risks are data privacy concerns that could deter adoption, network vulnerabilities that could affect grid stability, and impacts on consumer confidence. We would also flag, as we did in that submission, that risk is generally manageable for chargers on home internet connections but is likely to be higher where company vehicles connect to corporate Wi-Fi networks to charge — an area that may warrant particular attention for fleet and workplace charging.

6. Other Requirements (Section 4.6, p.19 — Questions 27–30)

Drive Electric supports built-in circuit overload protection (p.19), and strongly supports Q30 (p.19): software updates must not remove a charger's compliance with the rules.

7. Information and Labelling (Section 4.7, p.20 — Questions 31–32)

Drive Electric supports the proposed information and labelling requirements (Section 4.7, p.20, Qs 31–32). Labelling could be particularly valuable here in helping consumers compare products, understand capability differences between chargers, and trust that labelled smart functionality is genuinely standardised rather than proprietary — addressing the risk, raised in our submission on MBIE's 2025 proposals, that consumers are sold 'dumb' chargers by default without understanding the smart alternative. We would ask that the prescribed information formats (Section 4.7 table, p.20) be kept as simple as possible to implement, to avoid compliance costs flowing through to consumer prices and slowing adoption.

8. Notification, Families of Models, Application, and Testing & Certification (Sections 4.8–4.11, pp.21–24 — Questions 33–40)

On application and commencement (Q36, p.23), we support the intent of the point-of-supply approach and ask that EECA engage directly with manufacturers to ensure the commencement timeline suits their production and supply planning — while still moving at pace.

Drive Electric would welcome nominating members to any industry working group on the strict compliance pathway (Q40, p.24).

9. General (Section 4.12, p.25 — Question 41)

Drive Electric has no further specific requirements to propose at this stage beyond the points raised above, and reserves the right to raise additional matters as member consultation on the flagged items above is completed.

Closing

Drive Electric supports the overall direction of this consultation and looks forward to working with EECA as the technical requirements and rules are finalised. This letter reflects our position on the matters that follow directly from Drive Electric's published manifesto commitments.

Please do not hesitate to contact us if further discussion would be useful.

Yours sincerely,

Kirsten Corson

Board Chair

Drive Electric

kirsten@driveelectric.org.nz