

Submission to the Ministry of Transport

Charging Our Future

16 May 2023



Introduction

The Timaru District Council (TDC) thanks the Ministry of Transport for the opportunity to submit on the: “Charging Our Future: National EV Charging Strategy”.

This submission is made by the Timaru District Council, 2 King George Place, Timaru. The submission has been endorsed by Council. The contact person for Council is Nigel Bowen, Mayor of the Timaru District, who can be contacted at Timaru District Council, phone (03) 687 7200 or PO Box 522, Timaru 7940.

The contact person regarding the submission content is Andrew Dixon, who can be contacted via email Andrew.Dixon@timdc.govt.nz . We do not wish to speak to this submission.

Overview in Timaru District

The Timaru District Council is a local authority in the South Island serving over 48,000 people in South Canterbury. The main settlement is Timaru, with other smaller settlements of Geraldine, Pleasant Point and Temuka. Timaru District is the gateway to areas further south including Lake Tekapo, Aoraki/ Mount Cook and Dunedin.

General comments

TDC is supportive of initiatives that lower greenhouse gas emissions and create more sustainable methods of travel. TDC supports Central Governments Emission Reduction Plans, including improving EV-charging infrastructure as part of future-proofing transportation moving towards electric vehicles.

TDC, however, concludes that this is the role of Central government and TDC should not be responsible for car charging infrastructure. Usage of cars and fuelling is a matter of commercial infrastructure such as fossil fuel stations that are privately owned and run under commercial enterprise. EV charging stations should be no different.

TDC supports the further investigation and sees this as an opportunity to develop a plan with Central to provide funded opportunities for development. TDC considers that a review should be taken to consider if available power could be better utilised for industrial activities including moving to electric boilers, which would have a greater benefit. This greater benefit would be seen easier in Industrial spaces by using the electricity infrastructure in other ways would provide a greater benefit in the Emission reduction plan.

Background:

The 'Charging Our Future: Discussion document' outlines five long-term outcomes¹:

1. Support the vision- underpinned by affordable, reliable, secure and safe power service
2. All EV users can safely access and use charging
3. Underpinned by integrated and streamlined cross-sectoral planning and standards
4. Market functions effectively and can adapt and evolve
5. Charging system supports the transition to and use of low emissions transport modes.

This submission will provide feedback and suggestions for these outcomes.

1. Outcome 1: Our National EV charging system is underpinned by affordable, reliable, secure and safe power supply and infrastructure.
 - i) The local lines company Alpine Energy provides the Timaru District with the substations, poles and cables for the distribution of power throughout the district. Alpine is part-owned by Ratepayers through Timaru District Holdings Limited Company (a subsidiary of the Timaru District Council) which has 47.5% shares in the company. We have had the opportunity to read and support the submission made by Alpine Energy particularly Alpine's focus on Outcome 1- an affordable, reliable, secure and safe power supply and infrastructure.
 - ii) Alpine networks recognise that Timaru District has diverse energy demands; including significant industrial process heat requirements combined with seasonal demand driven by irrigation.
 - iii) There is currently insufficient infrastructure capacity to supply new chargers in some areas, including central Timaru.
 - iv) Consideration needs to be provided for rural areas of Timaru District which do not meet the population criteria of 2,000 persons, but towns that have a high level of traffic flow through of visitors.
 - v) While EV charging stations are considered a priority by the Central government, TDC is responsible to the Timaru District residents and their priority is to ensure the electricity infrastructure is fit for purpose.

Recommendation:

- vi) TDC supports the need for further investigation into the local electricity network by Alpine to ensure that any changes minimise stress or risks of failure on the local network.
- vii) TDC, as per our submission to the 'Future for Local Government', stresses the need to stop unfunded mandates, but rather seeks investment by Central Government using the local expertise of councils to achieve agreed objectives. Here, this would be a partnership with Central to provide resources for upgrading the capacity of electricity infrastructure.

¹ Page 15, 'Charging Our Future: Discussion Document'. [https://consult.transport.govt.nz/policy/charging-our-future Discussion Document](https://consult.transport.govt.nz/policy/charging-our-future-Discussion-Document)

2. Outcome 2: All EV users can safely access and use EV charging when and where needed.

- i) Access and ability for EV vehicle consumers to charge at home is considered a consumer activity; including the challenge of charging vehicles in or near multi-dwelling properties. The Council does not generally offer any suggestions directing consumer activities but can provide information. Waka Kotahi target of having a charging hub every 150-200 kms on main highways by 2028 would need to be fully funded by Central Government and not be an unfunded mandate pressuring increases in Council rates to meet the target.
- ii) The target to ensure that settlements with a population of 2,000 or more have a public charging municipal or community facility by 2025, needs to be explored further, particularly around the cost to set up and maintain a charge station where the current user demand does not meet market cost-effectiveness.

Recommendation:

- iii) TDC supports further consultation with Iwi/hapu to identify solutions for EV charging on marae.
- iv) TDC supports the Central Government targeting public investment where gaps are identified in the market-driven provision, such as for smaller rural settlements.
- v) TDC supports collaboration with key stakeholders for this initiative to ensure the expertise held by Council is used constructively with the delivery of the key objective.
- vi) TDC does not support a Lines Company charging residential customers for EV-charging upgrades of the network (which would distribute charges for EV charging infrastructure across non-EV users). TDC supports a user-pays system, funded by charger providers and charger users.
- vii) TDC supports further research into regional areas: as stated in the Discussion Document each regional area is different and the 'one-size fits all' approach will not capture the uniqueness of regions.
- viii) TDC supports additional Government financial support to ensure the infrastructure needs of rural communities are not disproportionately high-cost compared to those in nearby urban communities. Rural residents have higher travel distances and are thus more vulnerable to running out of battery charge when travelling by electric vehicle.

3. Outcome 3: Aotearoa's EV charging system is underpinned by integrated and streamlined cross-sectoral planning and standards.

- i) The ability to create a standardisation system to support integration now and into the future will require legislation to outline a framework as well as consumer protections as the market expands.
- ii) Market regulation and consumer protections are not the purviews of councils and this should remain a Central government role.
- iii) TDC will consider and evaluate all by-laws and policies necessary to support Central to enliven strategies to increase EV charging stations.

Recommendations:

- i) TDC will support the EV charging station initiative in areas that it has control over, such as bylaws. However, TDC remains committed that Central review, upgrade and support of the electricity infrastructure before commencing any EVC charging stations are placed.
4. Outcome 4: Aotearoa's EV charging market functions effectively, can adapt and evolve over time, and is attractive to users, operators and investors.
- i) TDC welcomes an accelerating commercial investment to maximise market-led charger deployment (such as the recent announcement by Z Energy) and to enable innovation in new technology and business models.
 - ii) We recognise that the ability to use levers to encourage commercial players into the market is held by Central Government.
 - iii) TDC recognises EECA (Energy, Efficiency and Conservation Authority) ability to support innovation for finding solutions to impediment barriers.
 - iv) Any support from TDC however cannot take resources away from current Council priority business. In the Long Term Plan the Council does have a commitment to climate change adaptation through its current District-wide strategy-making and over time for in-house carbon emission mitigation in our vehicle fleet.

Recommendations:

- v) TDC recognises the importance of the Central government being the main contributor in creating market readiness for commercial players to enter with additional EV charging stations.
 - vi) TDC will work with Central Government to enable EV charging stations by making any necessary and reasonable changes to policy, by-laws and planning, to support this change. These changes will need to be enacted through the usual Council levers such as Long Term Plan or District Plan review, at the time those levers would usually be reviewed.
 - vii) Central Government holds the main levers to enable these infrastructural changes and enable the EV charging strategic vision into reality.
5. Outcome 5: Our National EV charging system supports the transition to, and use of, low- and low-emissions transport modes across the wider transport system.
- i) The approach to transition transport modes needs to recognise the changes in technology and support an integrated approach to energy infrastructure. There is a balanced approach that must be taken to support decarbonisation as a goal, which continues to support economic activity. The approach taken should reflect this balance rather than favour one activity over another.
 - ii) Funding assistance for roads comes from road user charges and fuel exercise taxes that are applied to fossil fuel consumption only Whilst supporting climate change mitigation initiatives such as decarbonising the vehicle fleet, TDC holds concerns that the replacement funding or alternative funding to the fossil fuel taxes that

provide funding for road maintenance, renewals and upgrades including safety has not been identified as part of the Strategy.

- iii) As discussed in a recent news article, Timaru District provides 7.3% of New Zealand's food and fibre exports.² The wider transportation system in this area needs better-maintained state highways and rural roads, as a perceived priority to Ratepayers.

Summary of Recommendations:

- i) TDC as per our submission to the 'Future for Local Government' stresses the need to stop unfunded mandates, but rather seeks investment by Central using the local expertise of councils to achieve objectives.
- ii) TDC supports further consultation with Iwi/hapu to identify solutions for EV charging on marae.
- iii) TDC supports the Central government targeting investment where gaps are identified in market provisions.
- iv) TDC supports further research into regional areas as stated in the Discussion Document each regional area is different and 'one-size fits all' will not capture the uniqueness of regions.
- v) TDC supports additional financial support to support the needs of rural communities to ensure there is not a disproportionate cost to areas of lower populations.
- vi) TDC supports strategic, alternative usage of the electrical infrastructure to provide greater benefit towards emissions reduction plans, particularly in industrial areas, rather than placing EV charging stations in these areas.
- vii) That the strategy considers future road funding taxes through the increased use of electricity and reduction of fossil fuels, to ensure adequate funding is available for our roading network including the rural roads that provide access to the farm gates.

Conclusion

Thank you again for the opportunity to submit on this Initiative. Please do not hesitate to contact us via Andrew.Dixon@timdc.govt.nz if you have any questions or wish to discuss aspects further.

Ngā mihi



Nigel Bowen

² 'Timaru pushes for Government recognition of financial contribution' published 26 April 2023, 16:41 Stuff.
<https://www.stuff.co.nz/timaru-herald/300862697/timaru-pushes-for-government-recognition-of-financial-contribution>

Mayor