

**22 October 2025**  
**To the Committee,**

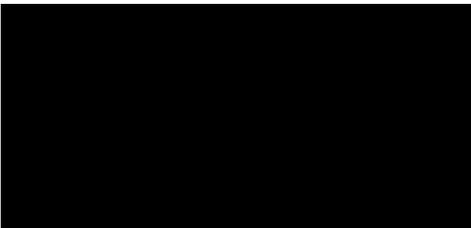
Victoria has an opportunity to accelerate electric vehicle uptake without government grants, but with government support through modest adjustments to the roles of Distribution Network Service Providers (DNSPs) and how they engage with energy retailers, or Financially Responsible Market Participants (FRMPs). These changes would ensure greater efficiency in how electricity is delivered for transport and allow private capital to fund visible public charging within the existing electricity system. The attached submission outlines how this can be achieved through the current regulatory and market framework.

Global experience shows a clear link between the confidence people have in purchasing an electric vehicle and the visibility of chargers in the street. Public-realm and kerbside charging are not just pieces of infrastructure; they are a key delivery mechanism for EV uptake. Consumers are more likely to buy EVs when charging is part of the streetscape. For that reason, public-realm charging should be seen as an accelerator of EV adoption rather than being measured purely on electricity volumes or commercial return.

The central point of this submission is that for government, this is a structural opportunity, not a financial one. EV charging can be delivered through the existing regulatory and market framework once DNSPs and FRMPs are able to participate more directly. Small, targeted changes to how those roles interact would unlock private investment and allow the electricity system itself to drive the transition.

It is also important to see EV charging as a new use case for electricity rather than as a separate industry. When treated separately, it creates duplication and higher costs. When integrated, it uses the existing system to deliver energy to vehicles fairly, efficiently, and at a cost consumers already understand.

The next step is for government to look closely at these regulatory settings and determine whether it wants to enable this approach. If the goal is to increase EV uptake, reduce emissions, and attract private investment, this path offers a clear and practical way forward.



**Jonathon Clark**

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# Connected\_\_\_Kerb

Connected Kerb (Aust) Pty Ltd

  
Australia

**20 October 2025**  
**To the Committee,**

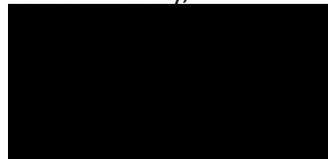
Thank you for the opportunity to contribute to this inquiry. The attached submission makes two key points. First, that public-realm and kerbside charging, delivered through Distribution Network Service Provider (DNSP) assets, is essential to driving electric vehicle uptake. Second, that EV charging should be treated as a new use case for electricity, not as a new or separate industry.

When the charging infrastructure is separated from the existing electricity system, it creates duplication and inefficiency. Around 80 percent of charging occurs at home, where networks already recover their investment. The remaining public charging cannot operate efficiently in isolation. For capital to be used effectively, those who invest in the system must be able to benefit across the full electricity market — not just the small portion represented by public charging.

Victoria already has the framework and capability to deliver electricity safely and fairly. Using that same system to deliver energy to vehicles at a comparable cost will build consumer confidence, accelerate EV adoption, and reduce reliance on government grants. Australia can learn from the UK experience — where fragmented systems are now converging toward integration — and start from a stronger, more efficient position.

In short, EV charging is not a new industry; it is electricity applied differently. Treating it as part of the existing system delivers lower costs, fairer pricing, and faster uptake — solving the funding problem while achieving the same policy goals.

Yours sincerely,



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## Submission to the Parliament of Victoria Legislative Council - Economy and Infrastructure

### Electricity Supply for Electric Vehicles

That this House requires the Economy and Infrastructure Committee to inquire into, consider and report, by 27 March, how Victoria can best harmonise electric vehicles (EVs) with electricity supply and demand, including but not limited to

1. strategies to reduce EV charging during periods of peak demand on the grid and increase charging during periods of peak supply;
2. whether public charging infrastructure is being installed at a sufficient rate in different parts of Victoria, including older suburbs where most people do not have access to off-street parking;
3. the best role for electricity distribution businesses in rolling out EV charging infrastructure, and how distribution network tariffs should be set for EV chargers;
4. strategies to facilitate the take-up of EV ownership, including the facilitation of bidirectional charging;
5. whether old EV batteries could have a second life as household or community batteries after removal from vehicles;
6. the barriers and opportunities to the manufacture, reconditioning and recycling of EV batteries, or other elements of the EV supply chain, in Victoria; and
7. any other related matters the Committee considers relevant.

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## **Executive Summary:**

### **Section 1: Defining the Challenge and Consumer Benefit**

*Defines the challenge — accelerating EV uptake depends on affordable access to energy and public confidence, not simply installing more chargers.*

### **Section 2: Integrating the Electricity and EV-Charging Systems**

*Outlines how system design and pricing alignment can make EVs an active part of the electricity system, balancing supply and demand through market signals rather than regulation.*

### **Section 3: Aligning Market Roles**

*Explains how distributors, retailers, and technology providers can collaborate efficiently — extending existing roles into electric mobility rather than creating new or overlapping industries.*

### **Section 4: Evolution of the EV-Charging Industry**

*Draws on Connected Kerb's commercial experience to show how integrated, return-on-capital models have been proven internationally and can be applied efficiently in Victoria.*

### **Section 5: Responses to Inquiry Questions**

*Provides concise responses to the inquiry questions, reflecting the principles outlined above.*

## Executive Summary

Victoria can accelerate electric vehicle uptake by using the strength of its existing electricity system rather than building a new one dependent on grants.

Public charging is the catalyst for EV adoption, not an end in itself. Visibility, convenience, and fair pricing at the kerb build consumer confidence and drive ownership. When charging is integrated into the existing electricity network, it delivers these benefits efficiently — supporting uptake while reducing overall system cost.

This submission sets out a practical and commercially grounded approach: treat electric vehicle charging as a new use case for electricity, not as a new industry. Doing so allows the capital value created by EV ownership to flow naturally through the existing system — maximising efficiency, supporting grid stability, and keeping benefits with consumers.

The electricity network, operated by Distribution Network Service Providers (DNSPs), and the retail market, operated by Financially Responsible Market Participants (FRMPs), already provide an efficient capital, regulatory, and market delivery structure for energy. The opportunity lies in understanding how EV ownership and charging can interact with that system, and ensuring that investment aligns with the flow of value across the entire network — not just within the 20–30 percent of energy consumed through public charging at the kerb.

If investment is directed outside this framework, inefficiencies will likely require these costs to be covered elsewhere — typically through government grants or higher consumer prices. The government can elect to follow that path but must recognise and quantify the cost of funding this duplication. By contrast, building on the existing distribution and retail systems allows electricity to be delivered to vehicles at the kerb at comparable cost to household supply. This approach captures full-system efficiency, enables scale to be reached more quickly, and removes the need for ongoing government support.

As a commercial charge point operator in the United Kingdom, our commercial experience allows us to understand how alignment with the electricity system enables a sustainable model to emerge — one that reduces cost, improves reliability, and supports consumer participation. Working with DNSPs and FRMPs to use DNSP-regulated assets in the public realm extends safe, efficient, and fair access to energy, maximising the value of the existing system.

This model removes dependency on grants, avoids duplication, and delivers a self-sustaining path to scale. It turns EV uptake from a cost to a system-wide efficiency gain achieved through commerce, not government funding.

The path forward is clear: build confidence, cut cost, and accelerate EV adoption — using the system Victoria already has.

## Section 1 – Defining the Challenge and Consumer Benefit

Connected Kerb welcomes the opportunity to contribute to this inquiry. Our perspective is based on more than a decade of operational experience as one of the United Kingdom’s largest EV-charging operators and through our growing role in the Australian market. Our focus is on delivering reliable and accessible kerbside charging — the most under-developed and least understood part of the Australian charging ecosystem. This discussion focuses on charging in the public realm, delivered on DNSP assets such as poles and street furniture, which extend the existing electricity system safely and visibly into the street.”

The key question for Victoria is not how to install more chargers, but how to accelerate EV uptake in a way that manages electricity supply and demand fairly, efficiently, and at least cost to consumers.

Experience from the UK shows that success depends on understanding how people charge their vehicles and aligning that behaviour with the strengths of the existing electricity system. Around 70-80 percent of charging occurs at home or work, while kerbside and destination charging make up the remaining 20-30 percent but have the greatest influence on confidence to purchase an EV. When charging is visible on the street, hesitation to buy declines sharply.

EV charging should be treated as a use case of electricity, not a stand-alone industry. The same capital, regulatory, and pricing structures that deliver power to homes can deliver it to vehicles. When investment happens outside that system, duplication occurs and costs ultimately fall on consumers. The best return on capital comes from using the network and retail framework that already exists, allowing those who invest in the electricity system to recover value across the whole market — not just the small share represented by public charging.

Early oversupply of public chargers should be viewed as a visibility investment that accelerates adoption. Utilisation should be considered across the entire network rather than by individual plug, as EV uptake naturally balances demand between home, work, and public charging. Every EV acts as a mobile battery; collectively they improve network efficiency and resilience when managed intelligently.

The policy objective should be simple: ensure households capture the full economic benefit of electrification. Electricity delivered at the kerb should, where possible, cost roughly the same as at home. This makes EV ownership affordable and transparent, giving households confidence in their running-cost savings — typically 70 to 80 percent compared with petrol vehicles.

EVs create two major pricing advantages for households:

- Lower running costs from replacing petrol with electricity.
- System efficiency as higher utilisation of the network spreads fixed costs and narrows volatility between supply and demand.

These benefits will only be realised when consumers experience them directly. At present, public-charging prices that are two to three times household rates remove much of that advantage.

Victoria can change this by enabling distributors and retailers to work together so that energy can be sold competitively at any charging point.

**While Not All Charging Is Equal, It Is All Valuable:** Every form of charging plays a role in an effective EV ecosystem, but each influences consumer behaviour, pricing, and the electricity network in different ways. Understanding these differences is critical to designing efficient and equitable infrastructure and pricing policy.

- Home, workplace, and commuter charging provide the greatest flexibility within the system. Private vehicles spend less than five percent of their time on the road — for the remaining ninety-five percent they are parked at home, at work, or in public spaces. This long dwell time allows distributors and retailers to manage vehicles as flexible energy assets. Charging can occur when supply is abundant or, through vehicle-to-grid technology, vehicles can return power during periods of high demand. This flexibility improves utilisation of existing assets, stabilises the grid, and lowers average energy costs.
- Kerbside charging, when priced comparably to home or workplace electricity, delivers similar benefits over shorter dwell periods. It is especially valuable in areas where off-street or workplace parking is limited and plays an outsized role in early adoption by increasing visibility and convenience. Charging points in public view normalise electric vehicles and reinforce confidence in ownership.
- Rapid and ultra-rapid charging serve an important function, but they are capital-intensive and operate differently. Their purpose is to support long-distance travel and driver confidence, not to deliver system efficiency. Because they must meet high-capacity demand instantly, they add fixed cost to the network and should be priced transparently to reflect that.

A balanced charging system needs all of these forms — each performing its natural role within the wider electricity market. Policy should recognise that EV charging behaviour is not comparable to refuelling at a petrol station. Charging can occur opportunistically, wherever a vehicle is parked. The convenience of available charging — particularly at home and at the kerb — encourages more regular and predictable energy use, reducing strain on the grid and improving load management.

The next consideration is how this system efficiency can be converted into direct value for households.

**Translating System Value to the Consumer:** The purpose of investment in charging infrastructure is not only to enable access but to deliver value to consumers. The physical network — whether at home, at work, or on the street — is only effective when its economic design ensures that the benefits of efficient energy distribution can be passed through to households.

As EV ownership grows, the challenge for government and industry shifts from installation to integration: aligning retail pricing, network management, and consumer behaviour so that the efficiency gains of electrification are realised in practice.

Retail pricing and access, rather than hardware deployment, now represent the main barriers to delivering these benefits at scale. When consumers can see and experience these savings directly, adoption accelerates. A fair and transparent pricing framework therefore sits at the centre of an effective EV strategy — one that converts system value into household benefit, reduces costs across the network, and supports equitable participation in the transition to electric transport.

**Two headline figures illustrate the scale of the opportunity:**

- **Cost of running:** An EV typically costs only 20–30 percent of the energy cost of a combustion vehicle — a 70–80 percent saving. In dollar terms, a household might spend \$2,000–\$2,500 per year on petrol, compared with \$500–\$600 per year on electricity for the same distance. To capture that outcome, energy must be delivered at a comparable cost on the street as at home. This can be achieved if distribution businesses manage the system efficiently and retailers compete on transparent pricing.
- **Household demand:** Adding an EV increases household electricity demand by 20–30 percent in higher-use homes and up to 40–50 percent in lower-use households — roughly 2,000 kWh per year of additional consumption. If the fixed cost of distribution, often around 30 percent of a household bill, is spread over this higher flow of energy, the average cost per kilowatt-hour falls. At the same time, as retail volatility narrows through better alignment of demand and supply, the overall cost of energy to the household should also fall.

The next section outlines how this can be achieved through electricity pricing and system design.

## Section 2 – Integrating the Electricity and EV-Charging Systems

Delivering the consumer and system benefits described in the previous section depends on how the electricity and EV-charging industries interact. Each participant — distributors, retailers, charge-point operators, and technology providers — influences how efficiently electrons and value move through the system.

Electricity costs are shaped by three elements:

- **Generation** – the cost of producing electrons.
- **Distribution** – the fixed cost of transporting electrons through the regulated network.
- **Retail** – the wholesale and contracting process where prices fluctuate with supply and demand. Retailers seek to manage this volatility by arbitraging between supply and demand to deliver a more stable price to consumers. The better the alignment between generation, distribution, and consumer behaviour, the lower the risk — and the smaller the margin retailers require to manage it.

Distribution businesses are geographic monopolies by design. Rather than viewing this as a weakness, Victoria can leverage their ability to deliver electricity safely, fairly, and at scale. If structured correctly, electricity can be delivered to a car on the street at the same cost as to a home.

EVs positively influence two of these elements:

- **Distribution:** As flexible loads and mobile batteries, EVs allow more electrons to flow without proportional new capital investment. Like cars on a toll road, higher usage spreads fixed costs, making the toll dilutive rather than additive.
- **Retail volatility:** EVs help reduce price volatility by charging when supply is abundant and prices are low. This improved alignment between supply and demand narrows risk, allowing retailers to reduce the margins they build into consumer prices.

**Critical enabler – Dynamic Retail Relationship:** The key enabler of this integrated model is the ability for the retail relationship to move dynamically with the consumer. In today’s electricity market, the relationship between distributors and retailers is governed through the financially responsible market participant (FRMP) framework, which defines who is responsible for each connection point.

For EVs, this relationship should be allowed to follow the customer — or the vehicle — as it moves between locations. This could be achieved through a form of virtual meter or equivalent mechanism that recognises a single customer identity across multiple charge points. The technology to support this dynamic structure already exists in other parts of the energy market and should be applied to EV charging to ensure consistency and competition.

Over time, all household and multi-dwelling sites should use smart meters. This is a low-cost reform that creates major long-term benefits: it enables the customer–vehicle relationship to operate

behind the household meter, giving consumers maximum flexibility and supporting future grid integration at minimal incremental cost.

**Beyond the Electricity Industry:** The EV transition is not simply an electricity-sector reform. A well-designed charging model creates a resilient business environment that spans multiple industries — retail energy, automotive services, software, finance, and local enterprise.

Like the rise of the internal combustion vehicle a century ago, EVs trigger a broad movement of capital — from infrastructure and technology to services and consumer products. The policy objective should be to harness this multiplier effect: encouraging participation from a wide range of businesses and ensuring that value creation is distributed across the emerging EV economy.

**Recommendations for Implementation:** Visible public charging is the catalyst for uptake. As the number of EVs grows, the system begins to self-reinforce — reducing distribution strain, narrowing retail volatility, and improving utilisation of generation.

Even though total demand for electrons will rise, the average cost of delivering each electron can fall. From visibility to usage to integration, the steps are clear, linked, and achievable in the near term. Victoria has an opportunity to harmonise EVs with electricity supply and demand while establishing the foundation for a fair, competitive, and capital-efficient market.

The effectiveness of this system depends on how well the industry works together. Translating pricing reform and system design into consumer outcomes requires coordination among distributors, retailers, charge-point operators, and technology providers — the people who make the system operate day to day. The next section outlines how those roles can align to deliver efficiency and consumer benefit.

## Section 3: Aligning Market Roles

Translating system design and pricing reform into real consumer outcomes depends on how well the electricity and EV-charging industries work together. Each participant already plays a defined role in delivering energy to consumers. The opportunity is to extend these roles into electric mobility while maintaining clarity, efficiency, and open participation.

**Distribution businesses** remain responsible for delivering electricity safely and reliably through the regulated network. Their geographic scope, local knowledge, and engineering capability make them well placed to enable public-realm charging — particularly in areas where off-street parking is limited. Early investment in kerbside charging should be seen as an investment in visibility and confidence that supports broader adoption.

**Energy retailers** or other financially responsible market participants are naturally positioned to become electric-mobility service providers (EMSPs). They already manage large customer bases, billing systems, and price competition. Extending those relationships to follow the consumer — at home, at work, or at a public charge point — allows them to maximise system efficiency and deliver consistent, transparent pricing.

While energy retailers are well suited to this role, the market should remain open. Other capable organisations — including fleet operators, charge-point networks, and digital-service providers — should be able to compete as EMSPs if they can manage customers effectively and deliver pricing aligned with household supply.

**Charge-point owners, operators, and technology providers** deliver and maintain the physical and digital infrastructure that makes charging possible.

- Charge-point owners provide the capital investment.
- Charge-point operators manage the day-to-day operation and reliability of those assets.
- Technology providers supply the software and systems that connect chargers to consumers and retailers.

Together they create the platform through which energy is supplied competitively and reliably to vehicles.

Experience from the United Kingdom and Europe shows that clarity in these roles is decisive. Where responsibilities blur, costs rise and consumer pricing becomes inconsistent. Where roles are clearly defined and open competition is encouraged, adoption accelerates and the wider economy benefits.

Victoria can establish this alignment from the outset — using existing regulatory structures and proven market roles to deliver fair, efficient, and consumer-focused charging across the state.

## Section 4: Evolution of the EV-Charging Industry

The EV-charging industry has developed rapidly over the past decade. Early operators had to build everything themselves — hardware, software, customer management, and billing — because no supply chain or standards existed. Those early models proved the concept but also showed their limits. Today, open protocols, mature supply chains, and clearer commercial frameworks allow each part of the industry to specialise and work together more efficiently.

Connected Kerb began as a fully integrated charge-point owner, operator, and electric-mobility service provider because that was what the early market required. We now manage more than 10,000 charge points across 1,000 locations in the UK and employ about 100 people. In 2025 we received a £55 million investment from the UK Infrastructure Bank to support further expansion.

Operating at this scale has given us a clear understanding of what drives commercial success. The business requires significant upfront capital, long-term discipline, and consistent operations. From experience, we know that commercial sustainability generally becomes achievable once a network reaches around 4,000 to 5,000 active chargers. Below that level, utilisation is limited, customer-management costs remain high, and operating margins are narrow — particularly because public charging represents only about 20–30 percent of total EV energy demand.

Unlike home or workplace charging, which benefits from daily use and direct billing through the household meter, public-realm networks rely on lower-frequency, opportunistic use. Achieving efficiency therefore depends on scale and integration — aligning the public-charging network with the broader electricity system so that capital investment can be recovered across the full market, not just its smallest segment.

Our UK experience demonstrates that EV charging is not a new industry; it is a new application of electricity. The product is still energy — what changes is where and how it is delivered. The opportunity lies in enabling capable organisations to extend their existing systems, capital base, and customer relationships into vehicle charging.

In practical terms:

- Distribution businesses are well placed to operate public-realm infrastructure such as pole-mounted chargers.
- Retailers, councils, fleet managers, and property owners can manage charging in private or semi-public settings.
- Technology providers like Connected Kerb supply the software, tools, and operational experience that make these arrangements efficient and reliable.

The goal is not to create new monopolies but to enable collaboration. This model encourages competition, speeds rollout, and ensures the benefits of electrification are shared across the wider economy — energy, transport, technology, and local enterprise.

For Victoria, the lesson is simple: build on what already exists. By using proven systems and shared capability, the state can move quickly, avoid duplication, and deliver a model that attracts investment while keeping pricing fair and transparent for consumers.

## Section 5: Responses to Inquiry Questions

### 1. Strategies to reduce EV charging during periods of peak demand and increase charging during periods of peak supply:

EVs are unique because they buy, use, and can supply energy. The timing of charging will be shaped by price and market alignment, not by regulation or restriction. When vehicles remain connected to the grid — at home, at work, or at the kerb — they can be managed as flexible energy assets that draw power when supply is high and defer or return it when the grid is constrained.

The key is to ensure that the value of this flexibility reaches consumers through fair, transparent pricing. Retailers and financially responsible market participants (FRMPs) are best placed to do this. They already manage competition and customer relationships — and can use dynamic tariffs and automated tools to manage charging collectively and efficiently. Get this right, and the payoff is substantial: less price volatility for retailers, lower costs for consumers, and fewer unnecessary capital upgrades for distribution networks. It's the simplest route to shared efficiency across the entire electricity system.

### 2. Whether public charging infrastructure is being installed at a sufficient rate, including in older suburbs without off-street parking:

No. Public charging is not being installed fast enough to meet the visibility and access needed to build early consumer confidence — especially in older suburbs without off-street parking.

This shortfall reflects a misunderstanding of what public charging is actually for. Its value isn't measured by immediate utilisation but by how effectively it drives EV uptake and supports an efficient electricity system. Public charging should be treated as part of the energy network, not as a separate industry competing with it.

When charging infrastructure is delivered through existing distribution networks, it becomes both cheaper and smarter. Kerbside chargers improve access, build confidence, and help stabilise the grid by spreading demand. The focus should be on integration — not just the number of chargers installed — to create an efficient, equitable, and commercially sustainable system for the long term.

### 3. The best role for electricity distribution businesses in rolling out infrastructure, and how tariffs should be set:

Electricity distribution businesses (DNSPs) have a central role — not only in rolling out charging infrastructure but in driving EV uptake itself. They already run the most extensive and capable energy delivery networks in the state. With the right settings, those same networks can deliver electricity to a car on the street as efficiently as to a home.

DNSPs have shown genuine intent to engage — developing tariffs and models that reflect their commercial interest in enabling EV charging. That should be encouraged, not constrained. Their ability to lower tariffs over time depends on higher utilisation of their networks.

The more electrons that move through the system, the more efficiently fixed costs are spread. Supporting DNSPs to expand kerbside infrastructure creates a circular benefit: more EVs on the road, better use of existing assets, and lower costs for everyone.

Government recognition is crucial. By backing DNSPs to operate within their regulated structure — as safe, capable enablers of public-realm charging, not as competitors to retailers — Victoria can accelerate rollout, reduce long-term costs, and strengthen consumer confidence in the transition to electric transport.

**4. Strategies to facilitate EV ownership, including bidirectional charging:**

Policy should not be built around secondary benefits like bidirectional charging until the primary condition — more EVs on the road — is achieved. The strength of Victoria’s EV transition will come from getting the fundamentals right first: scale, confidence, and participation. Once those are in place, the system-level advantages — storage, flexibility, and grid efficiency — will follow naturally.

The immediate priority is to make EV ownership easy, visible, and cost-effective. Public charging in everyday locations, priced comparably to home electricity, builds trust and momentum. When drivers see and experience the financial and practical benefits directly, uptake accelerates and the broader ecosystem strengthens.

Bidirectional charging will become valuable at scale, allowing vehicles to act as mobile energy assets. But that opportunity depends on a competitive and integrated electricity market where distributors, retailers, and other financially responsible participants can pass efficiency gains back to consumers. Get the fundamentals right first — scale and fair pricing — and the wider benefits will follow.

**5. + 6. Battery reuse, recycling, and manufacturing:**

These matters fall outside Connected Kerb’s direct area of expertise. Our focus is on charging infrastructure and system design, not on the manufacture or recycling of batteries.

That said, these are natural secondary industries that will grow as EV uptake increases. As outlined in our submission, building confidence and scale in EV ownership will create the foundation for a broader ecosystem — including battery reuse, reconditioning, and recycling.

**7. Any other related matters:** Our focus in this submission has been on charging in the public domain, but one wider opportunity is the universal adoption of smart charging. Every meter and charger should be capable of digital control and integration with the grid.

An electric vehicle is unlike any other appliance — it can draw, store, and return energy, often in multiple locations. Enabling smart control ensures that wherever a vehicle connects, it contributes to system efficiency and benefits both the consumer and the grid.

Energy demand linked to households will continue to expand, but not just at the home.

Vehicles, appliances, and digital systems — including emerging technologies that rely on data and connectivity — will all draw from the same underlying energy system. Because a vehicle can plug in at multiple locations, the ability to manage that demand dynamically across all uses and sites will be essential to maintaining efficiency, affordability, and reliability.