

EV Chargepoints consultation: Annex to Transport Focus letter of 10 April 2021

Payment methods

Q1: Are you in agreement that the payments specified should be allowed as an acceptable payment options? If you don't agree, please set out why.

Q2: If implemented, do you think these requirements should apply to all chargepoints? If not, which chargepoints should be covered and why?

Q3: What alternative solutions to contactless would provide consumers with a comparable quick and simple payment mechanism (provide evidence on costs)?

EV users identified dealing with a multitude of different payment methods as one of the biggest challenges they face when out on the road. We found strong appetite for methods that could be used at all chargepoints, whether simply contactless credit / debit card, or, through a roaming solution, an EV-specific universal payment card, or a universal app.

Users reported a wish to be able to access live support during the charging process, in particular to deal with issues that might arise – e.g. the unfairness of a connection fee if the charging fails and the user has to reconnect.

Q4: Do you agree we should intervene now to implement roaming? If not why?

Q5: Which option do you think is the most suitable approach for delivering roaming in the UK? Please rank the options in order of preference.

Q6: Please provide reasons for your answers, including supporting evidence or analysis, and suggest any alternative approaches to achieving roaming. Please state any challenges you foresee and what you would need to address them.

Q7: Do you agree with our suggested criteria when requiring chargepoint operators to allow access to their network?

It was clear that users valued simplicity, and reliability, of the charging interface. We found some willingness to pay a little more for a better service, but we did not probe users on attitudes specifically to options such as roaming hubs or intermediate service providers.

Opening up charging data

Q8: Are there any 'must-have' data types that should not be made available? If not, state which data sets and why, providing evidence.

Q9: Do you think that the 'should have' and 'could have' data types should not be mandated to be available now?

Q10: What, in your view, should be included in the disabled access information?

We did not find that any of the 'must have' data types were seen to be unnecessary; all should be made available to users, but there was particular emphasis on dynamic data, on the current working status of the chargepoint. This would enable users to

seek out, or avoid, a particular chargepoint in real time. Some reported frustration about finding chargepoints that are restricted to employees only at that site, or coming across others that are not listed on any app.

Accessibility was another important area, not just in relation to access for disabled drivers, but also physical access restrictions to the chargepoint, if on private land or in a car park, with perhaps inadequate space around it to easily manoeuvre one's vehicle.

The 'should have' and 'could have' data types were not disputed, but we also found a 'would like to have' around what other facilities might be available on-site. That said, there was also a desire for clarity and simplicity in the set of data being made available to users.

Data on chargepoint location should be easily understood, particularly in respect of precisely how to access the site, and if only of use to traffic on one carriageway of a motorway / dual carriageway road.

Q11: Do you think that Open Charge Point Interface should be adopted as the standard for the provision of public chargepoint data across the chargepoint operator's systems?

Q12: Do you think that adoption of a standard will present challenges? If so, what challenges?

Q13: Do you think that the preferred hybrid data architecture achieves the overall policy aim to make data available to support electric vehicle drivers?

Q14: What opportunities or challenges will this present for your organisation?

Q15: Are there any future technology, policy, or regulatory changes you are aware of that might impact the preferred data architecture?

Q16: What does government need to do to further minimise costs for industry? Please provide reasons for your answers, including supporting evidence or analysis, and suggest any alternative approaches.

Q17: Do you think the government should use the data architecture that emerges from the Modern Energy Data Access competition as a vehicle for open electric vehicle data?

Q18: Are there any related data platforms which the Open Public Chargepoint Data should be linked to? If so, please specify.

We did not establish user concern about these aspects of the underlying data architecture.

Using a single payment metric

Q19: Do you think the government should mandate a p/kWh metric? If not, why?

Q20: Do you think the government should allow chargepoint operators to have the flexibility to determine how the cost of charging, the energy consumed, and the total cost of a charging event is made available to a consumer?

Q21: Do you think the government should allow the exemptions to the p/kWh proposal and are there others we should consider?

Q22: Do you think that Measuring Instruments Regulations-compliant meters should be mandated for newly installed and renewed chargepoints to ensure the energy provided to a vehicle is accurately recorded?

Q23: Do you think that all chargepoints should have a Measuring Instruments Regulations compliant meters?

We did not find evidence of concern about a single payment metric, even when users were prompted. They did however want to see a clear metering display, showing how much charge is being supplied, the cost, and the time remaining to full charge, and users would want to rely on this information being accurate in line with standard regulations of energy meters.

Ensuring a reliable charging network

Q24: Do you think that a reliability standard should be set?

Q25: Do you think that the 99% availability standard should be set on a fleet average basis?

Q26: Do you have any other suggestions to achieve a more reliable network?

Q27: Do you agree a one-year lead time for operators to achieve reliability compliance after the regulations come into force is sufficient to implement the reliability proposals?

Q28: If the reliability metric across fleets was enforced, we propose that there should be exemptions from the availability target that are out of the operator's control. What types of failures should be exempt?

Q29: Do you think the government should mandate that chargepoint operators provide 24/7 call centres? Should we mandate this be low-cost or free-to-call?

This was a priority issue for users: they reported that trip planning and managing where to charge was in most cases straightforward, but there were concerns about, for example, having to use multiple apps to get a full picture of where the chargepoints are.

They have learnt to plan around the expectation of charger unreliability, and tell us that putting in place a 'back-up plan' often becomes the norm.

Users expected to see call centre services available significantly beyond standard office hours.

Users confirmed that they wanted to see the highest possible level of reliability across the public charging network, as close as possible to 100%. They understood that the standard might fall just below 100% because operational problems would occasionally arise, but 99.0% shouldn't be seen as the maximum to aim for. And any failures had to be immediately reported: great importance was attached to live information on chargepoint status, so that users could make the best use of the full network of chargepoints in any area.

Q30: Provide any cost and consumer data you may have to support a detailed assessment of these impacts (provide separate data for minimum payment methods, roaming, open data, price transparency and reliability).

Q31: Do you think there are other impacts that have not been identified? If yes, what other impacts are there that you think have not been included (provide supporting evidence)?

Q32: Are there any groups you expect would be uniquely impacted by these proposals, for example small businesses or people from protected categories? If yes, which groups do you expect would be uniquely impacted by each of these proposals? Provide supporting evidence.

Q33: Do you have concerns about consumer protection related to the use of public chargepoints that haven't been discussed in this consultation? Please provide reasons, analysis or evidence on what other consumer protection issues should be considered by government in the future.

No comment on these additional questions

Accessibility for disabled consumers

Q34: Do you agree with the accessibility issues raised?

Q35: Are there any accessibility issues we should regulate on?

Q36: Should there be standards that are enforced/brought in across chargepoints (such as payment height and instructions)? If so, what standards?

Q37: Do chargepoint operators need to provide supervised stations to help assist those with accessibility needs?

There was awareness of the particular requirements of disabled users of chargepoints, and a desire to see accessibility to be a key component of chargepoint design from the outset, rather than a subsequent modification. And, in addition to the points identified it was noted that drivers suffering from anxiety would have heightened concern about range and chargepoint availability. But we found also recognition of the benefits of EVs for disabled drivers, given the ability to avoid fuel stations (as charging the EV at home would be the norm), and the greater simplicity and ease of driving an EV.

Weatherproofing and lighting

Q38: Does the lack of weatherproofing and lighting at most chargepoints require improvement? If so, what would this look like in your view?

Q39: Should any improvement apply to all chargepoints or those in specific locations? If specific locations, can you identify which?

Users were clear that any measures to improve comfort would be welcome. Lighting was an important component of feeling safe, and female respondents in particular were anxious about chargepoints tucked away in remote corners of sites. It was felt that user safety was more driven by having easy, inconspicuous ways to pay, and through having other activities on site such as a staffed café. Users had concerns around the tendency for chargepoints to be found in more isolated locations, and

were attracted to the idea of 'hub' facilities replicating the busier environment of a petrol / diesel filling station

Signage

Q40: Is signage to chargepoints an area that requires improvement? If so, what would this action look like in your view?

Our broader research with road users has shown the appetite for clear signposting of facilities available on major roads. The EV users we spoke to wanted to see improved signing to chargepoint locations in the last few metres in particular, within complex layouts such as larger car parks, to complement the live information they get through apps on chargepoint availability.