REA ELECTRIC VEHICLES

REA EV Forum briefing – Developing the REA position on roaming

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Confidential – solely for REA member review and discussion

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Background

- Market for EV charging payments and roaming has advanced considerably in the UK in the past 12 months
- Growing ministerial and governmental frustration with lack of roaming and other payment-related public charging issues
- Government requesting language from REA that they will consider including in forthcoming 'Consumer Experience' consultation, expected December 2020
- REA proposes options that we could take to Government
- A working group meeting on this paper will be held for REA members on the 3rd September 2020 at 10:00am, register here.

Background

The REA's position on roaming (since the launch of our February 2019 report on interoperability in the UK) has been:

> *The REA sees roaming as essential to encourage the mass uptake of EVs. However, we do not believe direct Government intervention is presently warranted. The REA is working with members to deliver roaming in an industry-led way.*

The Government's request for input on this consultation has prompted us to review this position and seek updated language that members can support.

The REA is developing the below proposed language around the following principals:

- **Beyond ad-hoc**: *any definitions adopted should built on, and go beyond, those outlined in the Alternative Fuels Infrastructure Directive*
- **Inclusive of innovation and choice**: *definitions should not prescribe a single delivery organisation for roaming, should enable multiple business models for delivering roaming (e.g. both peer-to-peer and roaming), and should not inhibit innovation in payments / data from coming forward*
- **Build on what's being done:** *roaming regulation should integrate with / be implemented with an eye to other developments in the sector, including around mandatory data sharing*
- **Ultimately deliver a superior customer experience**: *regulations should be implementable, practicable given current technology, enforceable, and result in a simplified and more streamlined experience for individual drivers and fleets*

Roaming language for discussion

Following extensive discussion with members, the REA has identified a number of policy options the Government could consult on and implement to encourage the uptake of roaming.

Below members will find two PREFERRED options for discussions at this stage, and two DISCOUNTED options that we have tested informally with the market but do not believe are viable. We would welcome comments from all market participants, and the paper will be discussed at the next working group meeting.

Preferred Option 1: Government requires all public Charge Point Operators to allow access to more than one eMobility Service Provider.

Draft language: *All public charge point operators in the UK are required to allow more than one eMobility Service Provider with customers in the UK to access their charge points.*

Strengths of language:

- Simple and concise
- Allows for both roaming hubs and peer to peer models
- Does not force Charge Point Operators to do business with anyone they are not comfortable with
- Allows for commercial flexibility in negotiating terms between an eMSP and CPO
- Aligns with, but gives more flexibility than, French regulations relating to roaming

Weaknesses:

- How to enforce this - would CPOs need to report to Government annually who their second eMSP partner is?
- Does not guarantee extensive roaming, as CPOs are not incentivized to deliver widespread coverage (just comply by offering a minimum level of coverage).

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Preferred Option 2: Government requires all public Charge Point Operators to publish a public roaming tariff

Draft language: *All Charge Point Operators in the UK are required to maintain and publish a roaming tariff. This tariff should be the minimum price a CPO would accept for a third-party eMobility Service Provider to pay per kWh to access their charging sessions.*

Charge Point Operators should also publish terms of payment (e.g. expected payment timeframes). Charge Point Operators cannot refuse access to a charging station from an eMSP who is willing to pay the roaming tariff and agree to the published terms.

The UK Office for Low Emission Vehicles will nominate an organisation to maintain a public list of roaming tariffs and payment terms which can be amended by Charge Point Operators if tariffs change.

Roaming tariffs should be, at maximum, the highest ad-hoc price charged by a Charge Point Operator.

Strengths:

- Ensures a minimum level of roaming without Government being prescriptive
- Allows for other agreements to be made between CPOs & eMSPs at rates below the public roaming rate, either negotiated bilaterally or via a roaming hub
- Integrates with existing processes – e.g. Gireve already requires CPOs to publish a roaming tariff
- Enables membership models to continue - companies like who offer a discount to those who pay a monthly membership would be able to publish a rate similar to the non-membership price and their members would maintain their benefits.
- Avoids situation where CPOs are being forced to comply with terms and prices they are not comfortable with.

Weaknesses

- May generate opposition from CPOs disinclined to roam

Accompanying draft definitions to Options 1 and 2

Draft definitions for discussion.

Charge Point Operator (CPO): *A CPO operates one or more charging stations on its own account and is responsible for the installation, operation and service thereof.*

Electromobility Service Provider (eMSP): *An eMSP is a provider of charging services to customers. Such services typically include providing access to charging stations for vehicle users via charging cards or apps, processing requests to charge, and taking payments for charging sessions.*

A Charge Point Operator may also perform the role of an eMobility Service Provider but for the purpose of these regulations these business functions are considered separate.

Roaming: *Charge point operators and e-mobility service providers entering into agreements between each other or with an intermediary body that enable customers to use one membership account to access and pay at the stations of multiple charge point operators.*

Discounted Option 1 – minimum numbers of chargers

Draft language: *Public Charge Point Operators are required to allow their members access to a number of public third-party chargers equivalent to 10% of the number in their own network*

Strengths:

- Simple, delivers some roaming

Weaknesses:

- Very difficult to monitor, encourages compliance not innovation

Discounted Option 2 – licensing scheme for eMSPs

Draft language: *Public Charge Point Operators are required to allow all licenced eMSPs in the UK access to all their charging points in the UK.*

The UK Office for Low Emission Vehicles will designate an authority to grant licenses to eMobility Service Providers in the UK. Unlicensed eMSPs will still be able to operate in the market but will not be given automatic access to the charging stations operated by all public charge point operators in the UK. Licences should be granted by proving that an eMSP has a minimum level of technical product development, financial solvency, and other criteria to be stipulated.

CPOs may decline working with an eMSP if the offered price is below the wholesale price (or standard price) offered by a charging station at a particular location.

Strengths:

- would ensure that CPOs aren't being legally required to entertain every start-up eMSP with products that aren't developed enough, or with risky credit backings
- License could stipulate that CPOs have full access to their data

Weaknesses:

- Would reduce innovation and lock-in market dominance of companies
- May undermine the ability for CPO to set its own prices and payment terms
- Complicated and bureaucratic

With questions or comment, please contact:

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ENDS