

I am providing comments on the EV charging market study on behalf of Flexitricity. Flexitricity is a demand side flexibility business, which has aggregated customer assets into GB flexibility markets for 12 years. We are currently involved in studies providing flexibility from EVs, including [WPD's V2G trial](#), [Electric Nation](#) in partnership with domestic customers with a Nissan EV chargepoint. We are keen to discuss with the CMA how flexibility providers work with CMA identified relevant players (especially DNOs) to manage EV chargepoint participation in flexibility. For many of our customers, the ability – or not – to access flexibility markets through aggregation is a key factor in whether or not to move forward with investment in installing chargepoints (particularly off-street/workplace).

Theme one: developing competition while incentivising investment

While we agree that competition is important, as flexibility providers what is of most criticality for our ability to flex customers' chargepoints is that they are a) interoperable and b) adhere to reliability/quality standards currently under development. The interoperability point has been well made by OLEV and more recently in the BEIS-funded BSI PAS 1879, which we would suggest as essential reading for the CMA market study. It is imperative that chargepoint OEMs should only be developing and deploying equipment which meets the PAS 1878 and PAS 1879 standards, otherwise they will be non-smart and therefore unable to support grid security.

In a UK context, this includes adherence to the BSC Code of Practice 11 for Metering (CoP11) (this is currently in draft form within BSC P375 'Metering behind the Boundary Point' having been approved by the BSC Panel and sent to Ofgem). CoP11 sets an applicable metering standard for asset meters (i.e. non-boundary meters) including EV chargepoints, to measure the consumption or generation of equipment. This is critical is an asset is to take part in flexibility markets such as the Balancing Mechanism, or if specific EV chargepoints within a home are to be used for a commercial fleet vehicle and paid for separately, or for separate payment of EV charging spaces within a business park car park. To ensure asset sub-metering is available 'out of the box' to enable more business models for consumers, OEMs need to implement Cop11 standards as a minimum requirement, which is expected to be approved in February 2021. The draft Code of Practice is publicly available within the P375 Final Modification Report [here](#).

Theme two: effective consumer interaction with the sector

We welcome the CMA's consideration of this theme, and trust that you will engage with Citizens Advice and Catapult on this topic, in particular the latter's [CVEI trial and report](#). In this trial of non-early adopters, Catapult offered two types of smart charging – user-manged (where consumers choose their own charging time) and delegated control, where suppliers or a third party aggregator manages when the charging takes places. To ensure that consumers have access to both types of charging it is essential that OEMs design and deploy chargepoints which are optimised for remote dispatch, as is set out in detail in PAS 1879 and CoP11. Consumers will only be able to reap the financial benefit of flexibility markets (which will be key to offsetting the cost of EV chargepoint installation for the majority of consumers) if they can delegate control of charging within customer-set parameters, and this requires commitment from OEMs.

Additionally, flexibility creates customer value for longer-dwell chargepoints, whether at home, on-street or at work. All chargepoints – with the possible exception of ultra-rapid chargepoints (as outlined in 13.f) – should have the requirement to facilitate remote dispatch for flexibility services. User experience design of both the chargepoints and associated apps should make clear to the customer what the effect of smart charging might be (whether for the customer, flexibility provider or relevant players identified in sections 20-24 of the CMA invitation to comment).

We look forward to participating in the CMA's market study, and would be happy to offer more detail on the above when you are ready.