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**Competition and Markets Authority  
Electric vehicle charging market study  
Invitation to comment**

**Response from:**

***British Vehicle Rental and Leasing Association***

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***Bona-fides*****BVRLA, the industry and its members**

- Established in 1967, the British Vehicle Rental & Leasing Association (BVRLA) is the UK trade body for companies engaged in vehicle rental and leasing.
- BVRLA membership provides customers with the reassurance that the company they are dealing with adheres to the highest standards of professionalism and fairness.
- The association achieves this by maintaining industry standards and regulatory compliance via its mandatory codes of conduct, inspection programme and conciliation service. To support this work, the BVRLA shares information and promotes best practice through its extensive range of training and events.
- On behalf of its 1000 members, the BVRLA works with governments, public sector agencies, industry associations and key business influencers across a wide range of road transport, environmental, taxation, technology and finance-related issues.
- BVRLA members are responsible for a combined fleet of over five million cars, vans and trucks, supporting around 465,000 jobs and contributing £49bn to the economy each year. For more information, please visit [www.bvrla.co.uk](http://www.bvrla.co.uk).

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## **Introduction**

The British Vehicle Rental and Leasing Association (BVRLA) represents over 1000 members in the vehicle rental and leasing sector. BVRLA members own and operate a combined fleet of over five million cars, vans and trucks. It purchases around 50% of all new vehicles sold in the UK, including an estimated 80% of new battery electric vehicles (BEVs).

It runs the [youngest, cleanest fleet on UK roads](#) and provides people and businesses with flexible, affordable access to road transport by the minute, hour, day, week, month or year. BVRLA members also advise their customers on how they can decarbonise or embrace more sustainable transport modes for their travel needs.

## **Decarbonisation of road vehicles**

The vehicle rental, leasing and fleet sector has a crucial role to play in the decarbonisation of road transport. With a typical fleet cycle of between 1-5 years, BVRLA members spend billions of pounds on new plug-in vehicles each year and feed thousands of affordable electric cars and vans into the second-hand market.

BVRLA members are already phasing out ICE cars and vans. They have embraced the challenge of transport decarbonisation and many have introduced internal ambitions for zero-emission fleets in advance of the 2030 phase out target. The incentive regime for parts of the industry, specifically company car fleets, has allowed our members to become the trailblazers of decarbonisation.

Every part of the fleet sector is committed to decarbonising, but some face a much harder challenge than others. One of the biggest challenges is with infrastructure and ensuring there is adequate, affordable, accessible and reliable charging provision. Another key challenge relates to the grid upgrade process where costs and timing are prohibitive, however, we understand that this is out of scope for this study.

We welcome the opportunity to share further detail about these challenges and to offer some potential solutions that may provide much needed consumer confidence.

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## **Theme one: developing competition while incentivising investment**

### **1. How is the EV charging sector developing and how will technological or other developments (for example smart technologies) impact sector development and competition?**

Many members feel that the sector is developing much too slowly and sporadically. Ease of access and use, the ability to 'roam', a universal delivery method and competitive pricing without subscription or multiple accounts is essential.

Coverage is still patchy, especially outside of London and the South East.

There is a need for a coordinated approach that ensures charging is a simple and seamless process. This will be especially important for the many commercial vehicle operators who will be rapidly scaling up their adoption of EVs over the next few years and who will need to charge quickly and cost effectively.

There are also questions about how SMART charging will actually work i.e. will it actually allow consumers to charge when the price is at its lowest and what will the impact be on pricing of energy if everyone moves to charging overnight?

Members are concerned about being mis-sold. This is due to consumers being offered more expensive chargepoints which allow SMART or Vehicle to Grid charging but without the technology being fully available. There is also a fear that these chargepoints may quickly become redundant as technology develops.

### **2. How well is competition between EV charging providers working at present in the different sector segments and what are the key risks to effective competition (including any emerging competition concerns)?**

It's very early to tell at this stage. However, while some members feel competition is strong due to the wide variety of companies, others have raised concerns about the stark difference in pricing especially when accounting for different subscription models. This may level out as the market develops but this is an area where members are concerned they may be 'caught out' especially when there isn't widespread knowledge of providers or their reputation/brand values.

In the absence of a regulatory body/consumer assurance scheme, there are questions about the ethics of some companies and whether they have the consumer's best interests at heart. Members are already experiencing issues with companies which have claimed to have the perfect solution for fleets, only to find that the back-end systems do not work as advertised. There is also a concern about the longevity of companies due to the large number of entrants to this market and the speed of evolution. If companies

were to cease trading this could leave consumers exposed with nowhere to go for help if issues emerge.

**3. How can competition in the different sector segments be strengthened as the sector develops, either by building on current policies and/or through other approaches?**

By allowing open access to chargepoints with contactless payment rather than forcing people to subscribe to multiple chargepoint providers.

There is a clear need for clear pricing and freedom to choose elements such as hardware, software platform, installation, maintenance, funding, etc. rather than consumers being forced into potentially over-priced bundles.

**4. What are the main existing and potential barriers to entry and expansion for EV charging providers and how can these be addressed?**

One of the main challenges for consumers is with the wide variety of pricing and the inability to 'roam'.

Access to land and sufficient power supply are also barriers that could hold back the transition to EVs. Our members feel that DNOs have too much power and can dictate pricing that is above what's actually needed. This is a particular concern due to the market being in its infancy and with certain elements built into the charges that are not fully understood by the buyer.

**5. How can chargepoints be effectively deployed to ensure there is sufficient supply to meet future demand? What factors need to be taken into account?**

We welcome the Government's investment to ensure there are a large number of high power accessible chargepoints convenient for major trunk roads and motorways but this must also be supported by fast public charging in cities, towns and at transport hubs. There also needs to be adequate provision in more rural locations too.

Realistically, while vehicles need to park up for a period of time to draw down sufficient power, there will need to be a charging point at nearly all parking bays. The grid will need to be able to cope with significant swings in demand through the day and night. There will also need to be a significant proportion of rapid or supercharge points to support electric vans that will need to recharge quickly during the day.

One of the main challenges will be on-street charging where very large numbers will be unable to charge at home and will be heavily reliant on public charging infrastructure.

There needs to be a good balance and investment in all charging provision whether this is at home, at depot, on street etc. and adequate provision in more rural areas as well as areas densely populated.

A strategy which shows how this will be developed and the timing for provision away from the strategic road network would be useful and may provide assurances to those looking to upgrade where there is currently no, or very little, charging provision.

**6. What incentives are there for private investment in EV charging infrastructure including within the different sector segments? How might incentives need to change for the future growth of the sector and development of competition?**

N/A

**7. What impact does public subsidy have on private investment incentives; are there any areas/gaps where public support is most likely to be needed?**

Greater levels of support (incentives, tax breaks) from Government will drive greater adoption and more widespread use, which in turn will drive greater interest into private investment. This could include a Green Investment Allowance where tax relief is given to those putting in the necessary infrastructure, especially where this triggers grid reinforcement.

It is essential that the impact fleets can have on the transition is recognised and that provision/support is aimed at fleets as well as the general consumer.

**8. What is required in order to ensure that rural / remote communities and those without off-street parking are well served by charging infrastructure?**

There will need to be significant investment in supercharge technology so that vehicles can be almost fully charged in a very short space of time, akin to visiting a filling station. This in itself will reduce the need for a charger at every space (point 5 above).

There is a danger of a two-tier system where those unable to charge at home will be paying a much higher premium to charge. Costs are currently around double for public charging versus charging at home. This will be a particular issue for companies who need to reimburse employees fairly and inevitably will impact the adoption of EVs.

Different funding for AC vs DC chargepoints would be beneficial as the costs vary significantly. Due to the need to reduce downtime, especially for commercial or rental vehicles, DC chargepoints will be preferential.

Centralised guidance/support for local authorities from central government would be hugely beneficial. This would ensure adequate provision in smaller more rural council

areas where they may not have the knowledge or expertise on how to bid for funding or understand their role in installing, servicing and maintaining charging once in place.

Connectivity to wi-fi or 4/5G will also be critical, especially if consumers are required to download an app to use the charging.

Safety is a greater consideration in more remote locations. Adequate lighting and CCTV could be considered to provide consumers with confidence that they will be safe when using the chargepoint.

**9. What role should local authorities play to help deliver EV charging in a way that promotes competition? What support would they need?**

It would be useful if local authorities could play a coordinating role for businesses looking to upgrade. They could aggregate demand in certain areas and present a more holistic picture to DNOs of what kind of grid upgrades should be prioritised and where. This would also make it easier for businesses to share the costs and risks involved in an upgrade, especially if this triggers grid reinforcement.

Local authorities could also support businesses by accelerating planning applications and granting access to land to support EV adoption by fleets.

They should also insist on the ability to pay any supplier via a single account and ensure that charge points are capable of any charge, whether AC, DC, CCS or CHAdeMO.

It is essential that there is a consistent approach across the country and we do not get a piecemeal approach – centralised guidance is therefore critical.

**10. What can be learned from the different policy approaches taken in the devolved administrations for the EV charging market's development?**

As above, consistency is imperative. There should therefore be one policy for the UK.

**Theme two: effective consumer interaction with the sector.**

**1. What challenges or difficulties related to chargepoints might act as a barrier to consumers switching from a conventionally fuelled passenger vehicle to an EV and how might these be overcome?**

Consumers need to be confident about the availability, payment type, suitability of connection type and charging speed.

There is little or no price transparency until arriving at a chargepoint. This means it is difficult for consumers to make an informed decision as to which charge point offers best value when planning a journey.

There is also huge variance in charging time and often a disconnect between the time to charge stated on the chargepoint compared with the vehicle.

Chargepoint data will become increasingly important as the number of customers choosing EVs for business or leisure purposes increases and users increasingly interact with public charging infrastructure. Access to data including the location of chargepoints, their availability, state of repair and pricing are all key areas that need to be openly available.

Alongside ease of payment and the ability to roam, reliability is a priority issue for members. Consumers are currently reliant on either individual chargepoint operators or commercial aggregators for information relating to serviceability of infrastructure, which is often inaccurate. Chargepoint operators should be able to use technology to proactively address issues before they are reported by the customer.

We are hoping that the Government's forthcoming consultation on the consumer experience will help to resolve some of these issues and think the Automated Electric Vehicle Act could be used more effectively to ensure reliability.

2. **What are the key challenges for consumers already interacting with the sector and how might these change over time as the sector grows?**

The ability to 'roam' and make payment via a credit/debit card is essential. It is already a significant challenge and will only get worse as the number of operators grow.

As the numbers buying/using EVs increases so too will demand on existing chargepoints leading to long waiting times, possible congestion and reduced convenience. This is a concern for commercial vehicle operators who often have issues with accessibility. Often the spaces are too small for a van or in spaces where a van will find it difficult to get in or out. There is also a need for those who take work vans home to be able to park and charge securely.

Some members are concerned about the potential for mis-selling, particularly as knowledge of a fleet operator's exact charging requirements may not be fully understood. An example of this is where suppliers are charging significant amounts for vehicle-to-grid chargepoints but the technology is available in very few vehicles. The concern is that, as vehicles evolve to enable V2G, the chargepoints may already be outdated and effectively redundant, with the company obtaining no benefit.

We would recommend some form of an approved supplier list. This would minimise the risks of mis-selling. There should also be a scheme similar to ATOL which would protect consumers if companies were to cease trading.



3. **How do consumers decide which chargepoint services and providers to use? What information do consumers need to make this decision and at what stage in the decision-making process?**

This is exceptionally difficult due to the lack of transparency. We need the same amount of visibility as we have at filling stations today with the illuminated signs which clearly display pricing. Zapmap is a useful tool but is not always accurate.

When it comes to consumers choosing the right company to install and maintain chargepoints we are already seeing evidence of companies not living up to their promises and are concerned about the impact on the consumer. Many companies currently claim to have the perfect fleet solution but with no regulator/trade body ensuring compliant practice and no clear guidance on how to future proof/protect assets there is a clear need for greater control and guidance.

4. **Can consumers easily understand and compare charging tariffs in this sector and what barriers, if any, do they face?**

This is very difficult due to a lack of transparency and does not lead to good competitive practices. The charge points need to have clear indications of how much they charge, both on any apps, websites and on the charger itself.

Consumers need to be able to plan their journeys ahead based on accessible, appropriate (AC/DC) and competitively priced chargepoints.

Guidance that helps educate consumers on the different charging types and prices would also be beneficial.

5. **Do particular groups of consumers face additional challenges to interacting with the sector and if so, who and why? How might these be overcome?**

There is an issue for anyone who may not be technically able i.e. the elderly due to the reliance on apps to plan and pay for charging. Vulnerable groups may also be adversely affected, especially if they do not have access to credit.

Those living in more rural/remote communities may face an additional problem of safety when using charge points. Additional security may therefore be a key requirement.

Commercial vehicle operators who need to charge quickly and efficiently also need to be considered.

Setting up consumer/user groups chaired by National Grid/appropriate trade bodies could help identify and address these issues.

6. **Are there any technological developments or tools that could support consumers to navigate the sector, for example by helping to make more informed choices?**

There is a clear need for mandated standards that ensure clear information on pricing, charge speeds and clarity on connection types. This reliable, real time information could be then be fed into all satnav systems.

7. **Are existing protections offered by consumer law and other measures (such as sector regulations) sufficient?**

It is too soon to tell, however, as previously stated there would be significant value in having an approved supplier scheme and/or accrediting body.

There are also concerns about how data might be used to influence pricing. Consumers must be protected to ensure demographic data is not used to determine pricing dependent on location, the car you drive etc.

8. **What, if any, open data measures are needed to support consumer interaction, such as through the growth of comparison sites and apps?**

Open and transparent pricing is an absolute must, combined with mandated standards as per point 6.

There should also be better interaction with the vehicle OEMs and satnav providers to ensure access to 'real time' information on chargepoint availability, connection type, price etc.

A current method to manage fleets is via onboard telematics, which alert the fleet operator when a vehicle is plugged in and reaches fully charged status. This is an expensive option and is not economic to replicate across the whole fleet, especially as the percentage of EVs on the fleet increases. We believe that a mandatory requirement for charge points and vehicles to be compatible with ISO15118 will become an important tool in managing retail fleets going forward.

Many members are currently reliant on either individual chargepoint operators or commercial aggregators for information relating to serviceability of infrastructure, which is often inaccurate. In the UK ZapMap is the best source of dynamic data with charger status driven largely by user feedback rather than open data APIs.

Standard APIs would also enable different price plans to be developed for EV consumers, much like tariffs used now for the mobile phone industry. This could include pay as you go options, all-inclusive tariffs capped at certain usage levels, and top-up options. The development of fully inclusive combined utility and mobility energy tariffs would provide consumers with more choice and ability to compare prices across different providers and switch if cheaper.

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9. **What else is required to help ensure that the EV charging sector develops in a way that is responsive to consumer needs?**

There is a need for clear, open market pricing with simple rules and regulations controlling them.

There is a concern that some important details get hidden behind technical and legal terminology.

Surveys that assess the different needs of consumer depending on their geographical location should be conducted and use cases built so charging provision is tailored to the needs of the community they will serve.

The BVRLA welcomes the opportunity to share our views on this hugely important area. We would be keen to work with the CMA as it progresses the study and would be very willing to host a workshop with members if this would be beneficial.