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To whom it may concern,

Mitie comments regarding electric vehicle charging market study

I am writing on behalf of Mitie, one of the UK's leading facilities management and professional services companies, to share our comments regarding the Competition and Market Authority's (CMA) market study into electric vehicle charging in the UK.

As one of the UK's leading electric fleet operators, with the largest UK fleet of pure electric vehicles (EVs), I wanted to contact you on behalf of Mitie to share some of our own experiences and challenges with EV charging. We noted that fleets are not in the remit of the study due to their charging infrastructure being based at central warehouses and depots. However, like many fleets, most of our vehicles are actually based at our employees' homes, with the majority of charging taking place at residential or public charge points, and vehicles often used for both business and personal use. Therefore, we believe that our experiences are relevant not only to other businesses, but also private motorists too.

As mentioned, Mitie is a leading EV fleet operator. We have nearly 900 pure electric cars and vans, in use by employees across the length and breadth of the UK. We've committed to switching the rest of our fleet of vehicles to electric by 2025 and are delivering around 25 news vehicles to employees every week. We've also installed over 600 EV charge points at our office locations, employees' homes and customer sites all over the UK. Given this experience we have faced and overcome several challenges, however there are still a number of barriers that prevent large businesses such as ours, and our employees, from switching to a fully electric fleet, with issues around charging being the most significant.

Mitie is a business with a workforce of around 77,500 people, covering every corner of the UK. To enable widespread EV uptake across our business, access to reliable and consistence charge point infrastructure and having the right types of charge points in the right places, is vital. However, as a result of the previous patchwork approach to charge point infrastructure, this is proving a significant challenge. There are two issues in particular, to which I wish to raise your attention.

Home charging

Some 80% of EV charging takes place at home. However around 45% of Mitie employees don't have access to off-street parking, significantly hindering the ability to switch to an EV. We know from our

employees that have an EV that one of the great benefits is that when charged at home, the vehicle is always fully charged and ready to go each morning. This reduces, and often eliminates, the need to make special stops to recharge. This is in stark contrast to employees without home charging, who regularly have to make these specific charging trips, making the switch to EV less successful. Range anxiety also means many people will only travel to a destination they know they can make a return trip to with only one charge, as they are not confident they will be able to find a charge point and refuel their vehicle for longer journeys. In fact, in a recent survey of our EV drivers, nearly half (48%) told us that issues with public charge points (such as not being available for on-street parking or a lack of rapid chargers) are a concern for them.

The UK needs an increased investment in EV charge points for on-street and communal parking to address these barriers and more consistency across the UK to ensure that those in more urban or deprived areas aren't left behind in the EV transition – which is what we are currently experiencing with our own EV transition.

Paying for public charging

As you may be aware, the majority of fleets pay for their fuel using 'fuel cards', so that employees can top up their vehicle at most UK petrol stations, with the cost coming directly to the employer. No equivalent system, with a comparable breadth of locations and suppliers, exists for EV charge points. The UK's inconsistent approach to charge point infrastructure has resulted in a number of different charge point manufacturers without any requirement for consistent payment systems.

Therefore, our drivers have no choice but to install, create accounts for, and add credit to, up to a dozen or more mobile phone apps to cover each different charge point provider, in order to have confidence that they will be able to charge their vehicle up, wherever they are in the country. This adds a significant barrier for many of our employees and, for some, the requirement to add credit to so many accounts can also create financial challenges.

We believe that the creation of a comprehensive EV fuel card or app which allows the use of any charge point network would prevent these issues, make it easier for our fleet drivers to make use of the full spectrum of charge points, and remove a barrier for those on lower incomes. Contactless credit card payments do not solve this issue for fleet drivers, as this method only provides cost information and not the data required (such as KWh used) to ensure accurate reimbursement when employees claim business expenses.

We believe that the future of fleets is electric and are passionate about driving that change among UK business. You may be aware that fleets are responsible for around 60% of all new vehicle sales in the UK, as well as making up a large proportion of the second-hand vehicle market. Therefore, ensuring that EV charging works for businesses will be vital to a successful transition to electric vehicles in the UK.

If you would like to discuss any of these points further, receive any further information or if there is any other way in which I can be of assistance, please do let me know and I would be happy to support.

Kind regards, Simon King

Director of Sustainability and Social Value Mitie Group plc