

North Yorkshire County Council
Business and Environmental Services

Executive Members

26 March 2021

DfT/OZEV EV Charge Point Consumer Consultation Response

1.0 Purpose of Report

- 1.1 To provide Members with outline details of the Department for Transport (DfT) and Office for Zero Emission Vehicles (OZEV) EV Charge Point Consumer Survey and to seek approval for the proposed response being submitted by the County Council.

2.0 Background

- 2.1 Section 1 of the Climate Change Act 2008 sets out the Government's target for reducing emissions of greenhouse gases by 2050. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 amended section 1 in June 2019 so that the target is for net zero greenhouse gas emissions to ensure the UK ends its contribution to climate change. In November 2020, the Government committed to ending the sale of new petrol and diesel cars and vans by 2030, with all vehicles required to have a significant zero-emissions capability (for example, plug-in and full hybrids) from 2030 and to be 100% zero emissions from 2035. The Government has committed £2.5 billion to support consumers to make this transition.
- 2.2 EV chargepoint installation and operation is a relatively new and growing market. The government wants to encourage and leverage private sector investment to build and operate a self-sustaining public chargepoint network that is affordable, reliable and accessible for all consumers. As charging technology and infrastructure evolves and expands, new consumer offers will continue to emerge. The Government wants to enable innovative charging approaches while ensuring that all consumers can charge their vehicle in a way that is as straightforward and reliable as refueling a traditional vehicle. This is essential, not only for existing EV drivers but for giving people who are more reluctant to switch the confidence to do so.
- 2.3 This consultation seeks views on proposals that mean current and future EV drivers will be able to locate available charge points simply, pay for a charge more easily and recharge their cars more reliably, regardless of where they are going in the UK.
- 2.4 It sets out expectations and ambitions across four critical areas:
1. Making it easier to pay
 2. Opening up charge point data
 3. Using a single payment metric
 4. Ensuring a reliable charge point network
- 2.5 In addition to the four areas highlighted above, they are seeking evidence on three emerging policy areas including:
5. Accessibility for disabled customers
 6. Weatherproofing and lighting
 7. Signage

- 2.6 The consultation is aimed at helping Government understand the issues facing consumers in the aforementioned areas and whether there are priority areas they need to address. It will provide an indication of where there may be a need for government intervention in the immediate future and which agency is best placed to intervene.
- 2.7 The Government will hold workshops to engage with industry and consumer groups to evolve the policy options for each of the four areas, previously mentioned, to reduce the burden and costs while best meeting consumer needs. Parliamentary time allowing, it is expected any necessary regulations will be brought in following this consultation in Autumn 2021.
- 2.8 Officers have therefore drafted a response for the consultation, which is due for submission by 10 April 2021.

3.0 Consultation Response

- 3.1 A full copy of the consultation response is attached as Appendix A, however, the key points are set out below.

3.2 Making it Easier to Pay

We have highlighted in the response that minimum payment methods of text, phone call, credit/debit card (including contactless payments) and cash should be implemented at all charge points to enable customers to pay easily and instantly.

3.3 Opening up Charge Point Data

We agree that a roaming solution, which provides a common method of access to all public chargepoints, through one membership card or smartphone app is appropriate. Furthermore any roaming solution must balance the potential benefits of improved customer experience and confidence in EVs against the potential impact of implementation costs on a largely new market. We ranked the four consultation options in order of preference as below;

1. Require operators to open their network to third parties – Ideally the Government would provide an interoperable platform, however, getting e-Mobility Service Providers (eMSPs) to open up their networks to third parties is the quickest and simplest way to make access easier for the consumer.
2. Government establishes an interoperable platform
3. Market led approach - With the market led approach there is a risk that progress is slow in establishing a common method of access, it would be good if Government support/partnership was able to help speed up the process.
4. Require all charge points to be accessible by QR code - Offering a QR code assumes ownership or access to a smart phone making it a potential barrier for some.

- 3.3.1 In the case of the preferred option 1, above, the Government would require chargepoint operators to open their networks to any third-party eMSP or each other without any discrimination. It is proposed that Charge Point Operators (CPOs) would be required to work with third parties that either have a minimum baseline criteria or are Financial Conduct Authority (FCA) regulated. We intend to respond that they should be FCA regulated though in the final comments of the survey it is recognised that the costs associated with this may be prohibitive and prevent innovation.

3.3.2 Government proposes to set a data standard that chargepoint operators need to meet when making public chargepoint data openly available and will mandate that 'must have' data types including location, power rating and pricing data must be made available. They also propose the data standard should be the internationally recognised, Open Chargepoint Protocol Interface (OCPI). It is agreed that the 'must have' data should be made available and standardised using OCPI.

3.4 Using a single payment metric

There is a proposal to mandate chargepoint operators to adopt a p/kWh metric for every unit of electricity sold under subscription and pay as you go models. The chargepoint operators would retain flexibility on how they display pricing, consumption and cost information to the customer. We agree with use of this metric. The cost of charging to the driver will be based on the quantity of electricity supplied as determined by a meter and we agree that for the most accurate reading it should be required that all newly installed must comply with the Measuring Instrument Regulations 2016 (MIR) to:

- Avoid inaccurate measures and;
- Short charging the driver

3.5 Ensuring a reliable charge point network

Public chargepoint reliability has improved with analysis showing that in August 2019 approximately 8% of public chargepoints were out of service - a decrease from 15% in 2017. However, in order to maintain a reliable network as the demand for charge points grows, improvements are required to drive consumer confidence in the public network. The government are proposing operators:

- Meet a minimum 99% average availability standard across their fleet of chargepoints
- Provide a free to call 24/7 call helpline for consumers

3.5.1 We agree these reliability measures should be set as standard.

3.6 Call for Evidence

The remainder of the consultation is seeking evidence on accessibility for disabled customers, weatherproofing, lighting, and signage.

3.6.1 Currently there are concerns around the provisions for disabled users at charge points ranging from high raised kerbs, insufficient space around bays and charging cables as tripping hazards. We have responded that there should be standards that are enforced across chargepoints for disabled users for example payment height, instructions.

3.6.2 We have stated that the weatherproofing and lighting needs improving at the majority of chargepoints. We have suggested that weatherproofing and lighting needs careful consideration, in particular in rural areas, where charge points are likely to be more exposed to the elements. Although lighting will be needed at charge points, including in rural areas, solutions should be forgiving of the environment, for example, in designated dark skies areas.

3.6.3 We intend to respond that signage is an area that requires improvement led by the government. One key area for signage improvements is the size of the sign; the solution should be small sign with clear instructions. This will help with issues around street clutter but may cause difficulty with TROs.

3.7 It should be noted that where a response states we “don’t know” it is because we do not feel the Local Authority can answer these questions.

4.0 Equalities

4.1 There are no equalities issues arising from this report. See Appendix B.

5.0 Finance

5.1 There are no financial issues arising from this report.

6.0 Legal

6.1 Consideration has been given to any legal implications in submitting a consultation response and none appear to arise at this stage but it is acknowledged that legal implications may arise at the implementation and operation stages of the chargepoint infrastructure

7.0 Climate Change

7.1 There are no immediate climate change implications arising from this report. See Appendix C.

8.0 Recommendation(S)

8.1 It is recommended that the Corporate Director – BES in consultation with the BES Executive Member for Access approves that a response to the consultation will be submitted to the Department for Transport and the Office for Zero Emissions by 10 April 2021 as detailed in Section 3 and Appendix A.

BARRIE MASON
Assistant Director - Highways & Transportation

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Background Documents:
None

Consumer experience of chargepoints

Introduction

Thank you for responding to our consultation your views will assist in informing the development of policy for the consumer experience at public chargepoints.

The closing date for the consultation is 10 April 2021.

[View all the questions](#)

This survey provides questions based on user choice, a [full copy of the questions is available \[opens in a new window\]](#).

[Print or save a copy of your response](#)

When you get to the end of this questionnaire, you will be offered the chance to either print or save a copy of your response for your records. This option appears after you press 'Submit your response'.

[Save and continue option](#)

You have an option to 'save and continue' your response at any time. If you do that you will be sent a link via email to allow you to continue your response where you left off.

It's very important that you enter your correct email address if you choose to save and continue. If you make a mistake in the email address you won't receive the link you need to complete your response.

[Accessibility statement](#)

Read our accessibility statement for [SmartSurvey forms \(opens in a new window\)](#).

[Confidentiality and data protection](#)

This consultation by the Department for Transport is being carried out to inform the the consumer experience at public chargepoints.

In this consultation we're asking for:

- your name and email, in case we need to ask you follow-up questions about your responses (you do not have to give us this personal information, but if you do provide it, we will use it only for the purpose of asking follow-up questions)
- whether you are representing an organisation or yourself

Additionally for:

- organisations we are asking for your organisational size, to weight your response accordingly in analysis
- individuals we are asking if you have owned or driven an electric car, in order to better understand your experience of chargepoints

Your consultation response and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. DfT will, under data protection law, be the controller for this information. [DfT's privacy policy \(open in new window\)](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

We will not use your name or other personal details that could identify you when we report the results of the consultation. Any information you provide will be kept securely and destroyed within 12 months of the closing date. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the consultation period end date.

You

1. Your (used for contact purposes only):

name?

email?

2. Are you responding: *

- as an individual? (Go to 'Further you')
- on behalf of an organisation?

Organisation details

3. What size is your organisation?

- Micro: Up to 9 employees
- Small: 10 to 49 employees
- Medium: 50 to 250 employees
- Large: Over 250 employees
- Don't know

(After answering go to 'Proposals')

Further you

4. Do you currently drive or have driven an electric vehicle? **N/A**

Yes

No

Proposals

As charging technology and infrastructure evolves and expands, new consumer offers will continue to emerge. We want to enable innovative charging approaches whilst also ensuring that all consumers can charge their vehicle in a way that is:

- straightforward
- reliable

Charging your electric vehicle (EV) should be as easy as refuelling a traditional vehicle. This approach is essential, not only for existing EV drivers, but allowing people who are more reluctant to switch, the confidence to do so.

This consultation sets our expectations and ambitions across four critical areas of:

- making it easier to pay, including setting a minimum non-smart tech payment method, and enabling an interoperable roaming payment mechanism
- opening up chargepoint data including: requiring chargepoint operators to open their data to third parties; ensuring setting a data standard of Open Charge Point Interface protocol (OCPI); identifying potential areas for alignment with other industry initiatives
- using a single payment metric including setting a standard to pence per kilowatt-hour (p/kWh)
- ensuring a reliable charging network by setting a 99% reliability standard across networks

In addition to these 4 areas, we are seeking evidence on 3 emerging policy areas of ensuring:

- that chargepoints are accessible for disabled consumers with visible and non-visible disabilities
- adequate weatherproofing and lighting at chargepoints

- enough signage for consumers to locate chargepoints

Minimum payment requirements for the consumer

We believe consumers should be able to pay instantly for using public chargepoints in a smooth and hassle-free manner.

At present, consumers need to be in possession of multiple membership cards or smartphone apps to access the public charging network.

Currently, only 41% of rapid and higher powered chargepoints (50 kW+) have contactless debit or credit card payment as an option.

Consumers should have a comparably simple payment experience at all chargepoints. Consumers should be able to have a payment option which enables them to pay without the use of a smart phone. We propose this can be with either a:

- credit card
- debit card
- cash
- phone or text

solution and it should be a requirement that all chargepoints should have at least one of these payment options.

We seek views on the best way to achieve this, that meets consumer needs and is commercially viable.

5. Do you agree an acceptable minimum payment method should be made by:

	Yes	No	Don't know?
phone call?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
text?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
debit or credit card chip and pin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
debit or credit card contactless?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
cash?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If no state why you disagree.

6. List any alternative payment approaches you would like to see added to the minimum payment method?

Cash payment should include both coins and notes

Chargepoint type reasons

7. If implemented do you think these requirements should apply to all chargepoints?

Yes (Go to 'Roaming')

No

Don't know? (Go to 'Roaming')

Against chargepoint type

8. Why?

Roaming

A roaming solution would provide a common method of access to all public chargepoints, including lower powered chargepoints, through one membership card or smartphone app. It could also provide a payment solution to meet the needs of fleet vehicle drivers.

Fleet drivers need a simple payment solution that operates across the chargepoint network and allows them to manage their business effectively. We ask how best to deliver a roaming solution to achieve this.

9. Do you agree we should intervene now to implement roaming?

Yes (Go to 'Roaming options')

No

Don't know? (Go to 'E-mobility service providers')

Against roaming solution

10. Why not?

Roaming options

- a market led approach - the government continues to work with industry to establish an industry led roaming solution but does not regulate at this stage
- to require all public chargepoints to be accessible via a QR code provided on, or in close proximity to, the chargepoint which then directs consumers to a payment platform
- that government establishes an interoperable roaming platform
- we require chargepoint operators to open their networks to any third-party E-mobility service providers (eMSP) or each other without any discrimination, this includes publishing a roaming tariff reflecting the minimum price that the third-party eMSP are required to pay per kWh in order to access their chargepoints, this would be the maximum ad-hoc price they charge

11. Rank your most suitable approach for implementing roaming in UK chargepoints in order of preference? (1 most favourite, 4 least favourite)

Market led approach	3
Require all chargepoints to be accessible by a QR code	4
Government establishes an interoperable platform	2
Require operators to open their networks to third parties	1

Provide reasons for your answer.

Offering a QR code assumes ownership or access to a smart phone making it a potential barrier for many.

With the Market Led approach there is a risk that progress is slow in establishing a common method of access, it would be good if Government support/partnership was able to help speed up the process.

It would be great for the Government to provide an interoperable platform, however, I feel getting EMSP's to open up their networks to third parties is the quickest and simplest way to make access easier for the consumer.

E-mobility service providers (eMSP)

For the roaming solution requiring operators working with E-mobility service providers (eMSP) we require chargepoint operators to open their networks to any third-party eMSP or each other without any discrimination, this includes publishing a roaming tariff reflecting the minimum price that the third-party eMSP are required to pay per kWh in order to access their chargepoints, this would be the maximum ad-hoc price they charge.

We are proposing requiring that chargepoint operators are required to work with eMSPs who:

- have minimum baseline criteria that will be published and updated annually by the government or another organisation, stating their:
 - level of technical development
 - size
 - business processes

or

- are Financial Conduct Authority (FCA) regulated and can secure access to all UK chargepoint operators under this regulation

Government and industry would work with eMSPs to achieve these criteria.

Any eMSPs that do not meet these criteria could still operate in the market, but chargepoint operators would not be required to work with them.

12. Do you agree with our suggested criteria when requiring chargepoints operators to allow access to their network?

- Yes to the minimum baseline criteria as stated (Go to 'Data')
- Yes to FCA regulated (Go to 'Data')
- No
- No, I think there should be more requirements for minimum baseline criteria
- Don't know (Go to 'Data')

Against criteria

13. What criteria do you think we should implement for e-mobility service providers participating in the market?

Data

Consumers should be able to locate and access chargepoints with ease. The lack of mandated data provision adhering to a standard means chargepoint data can be incomprehensive and inaccurate. More comprehensive, private sector led solutions are emerging, however, this data is not openly available, meaning there is a lack of competition in the EV services market.

We propose to require that static and dynamic chargepoints should be made openly available by default.

We invite evidence on:

- the options
- other solutions

for making live availability data available to consumers.

'Must have' data will be required to be shared through a government Application Programming Interface (API).

'Should have' data will not be mandated at this stage, however, Open Charge Point Interface (OCPI) which government intends to adopt is structured to accommodate both booking information and ancillary services on site should chargepoint operators wish to provide this information.

'Could have' data will not be mandated to be openly available instead allowing the market to determine demand for these data types and how best to satisfy this. This data will however be captured and aggregated to form historic data sets available to nominated stakeholders (such as DNOs)

Must have static data of:

- a chargepoint identification ID
- owner or operator
- location (address and coordinates)
- operating hours
- power (kW)
- connector type (type 2, CHAdeMO, CCS)
- payment method (RFID card, contactless, smartphone app, QR code)

- cost of obtaining access
- parking enforcement arrangements (and physical access restrictions)
- disabled access information

Must have dynamic data of:

- availability (in-use, available, booked)
- state of repair

Should have static data of:

- booking information
- ancillary services on site

Could have dynamic data of:

- who is charging
- queue length
- new chargepoints coming online soon

Could have static data of:

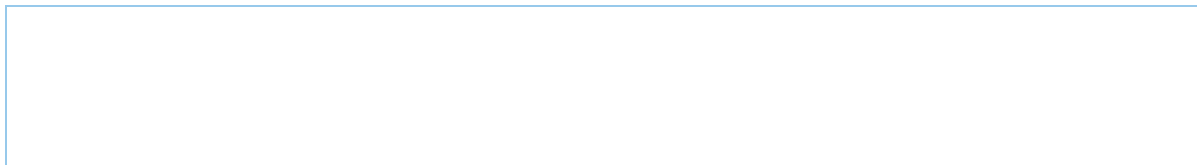
- historic (aggregated)
- utilisation
- periodic aggregated view of UK public chargepoint network

14. In your opinion are there any 'must have' data types that should not be made available?

- Yes
- No (Go to 'Data')
- Don't know? (Go to 'Data')

Must have data types

15. Which data sets and why (provide any evidence to support your view)?



Data

Should have static data of:

- booking information
- ancillary services on site

Could have dynamic data of:

- who is charging
- queue length
- new chargepoints coming online soon

Could have static data of:

- historic (aggregated)
- utilisation
- periodic aggregated view of UK public chargepoint network

16. Are you in agreement that the:

	Yes	No	Don't know?
'should have' data types are not mandated to be available to third parties now?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
'could have' data types are not mandated to be available to third parties now?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In our view it is crucial disabled consumers know accessibility information about the chargepoint before arriving, we welcome views as to how best this can be achieved.

17. What, in your view, should be included in the disabled access information?

Blue badge acceptability, level and surface accessibility information (dropped kerbs etc), availability of audio description (assistive listening/Audio Description) and is there sufficient space for manoeuvring?

Open Charge Point Interface (OCPI)

We propose that government will set a data standard that chargepoint operators need to meet when making public chargepoint data openly available and will mandate that 'must have' data types including location, power rating and pricing data must be made available.

We propose the data standard should be the internationally recognised, Open Chargepoint Protocol Interface (OCPI) as this provides the data types most important to EV drivers.

18. Do you agree that OCPI should be the standard provision for public chargepoint data across chargepoint operator's systems?

- Yes
- No
- Don't know?

19. Do you think that adoption of a standard will present any challenges?

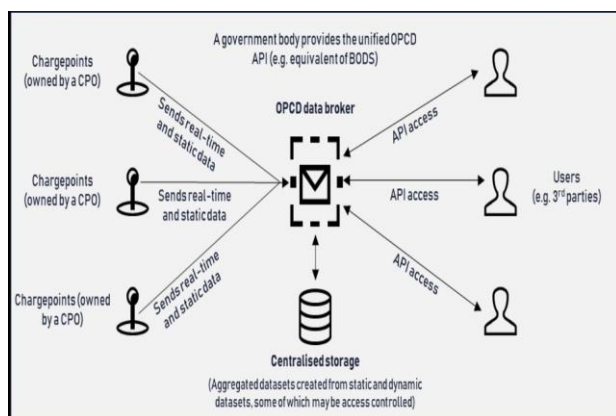
- Yes
- No (Go to 'Data architecture')
- Don't know? (Go to 'Data architecture')

Challenges

20. What challenges?

Data architecture

We have found a hybrid (Federated – Centralised) data architecture to be the most appropriate solution for the UK. Under this model, chargepoint operators would manage their own data, sharing it with a centrally administered data broker through a push mechanism.



[View in a larger image.](#)

This approach provides a single unified interface (an Application Programming Interface or API) for consumers to access chargepoint data from one location (for example a third-party app). Each chargepoint operator retains ownership and management of their source data. It avoids creating a disproportionate cost of compliance for those needing to share or access the data. EV data consumers will only need to access one interface, rather than multiple chargepoint operators. This simplifies the process and reduces costs. chargepoint operators would ensure the management and provision of data access complies with the standards and policies set out by the government.

To enable this hybrid architecture, we propose a central API for use by consumers, and a centralised broker solution (with associated storage) to allow chargepoint operators and data providers to share static and dynamic data. Chargepoint data will be openly available for consumption in line with established data sharing attributes; enabling data to be understood in a consistent manner by all stakeholders. This will be flexible to grow with the rate of growth of the sector.

21. Do you agree the preferred hybrid data architecture achieves the aim to make data available to support electric vehicle drivers best?

- Yes (Go to 'Data architecture')
- No
- Don't know? (Go to 'Data architecture')

Disagree architecture

22. Why not?

Data architecture

23. Will the data architecture model present any opportunities for your organisation?

- Yes
- No (Go to 'Data architecture')
- Not applicable as I am responding as an individual (Go to 'Data architecture')
- Don't know? (Go to 'Data architecture')

Data architecture opportunities

24. What opportunities?

Data architecture

25. Will the data architecture model present any challenges for your organisation?

- Yes
- No (Go to 'Data architecture')
- Not applicable as I am responding as an individual (Go to 'Data architecture')
- Don't know? (Go to 'Data architecture')

Data architecture challenges

26. What challenges?

Data architecture

27. What, if any, impacts to the preferred data architecture do you think may occur from future:

technology changes?

Don't know

policy changes?

Don't know

regulatory changes?

Don't know

28. What, in your opinion, do we need to do to further minimise costs for industry?

Don't know

Modern Energy Data Architecture (MEDA)

Modernising Energy Data Access (MEDA) is an attempt to develop a data architecture allowing:

- efficient data sharing
- enable interlinking of existing and new datasets

across different sectors.

This approach offers an alternative to the hybrid architecture model and may offer a solution that enables innovators to automatically extract data from chargepoint operators as needed.

29. Do you agree we should use the data architecture that emerges from the Modern Energy Data Access competition as a vehicle for open electric vehicle data?

Yes (Go to 'Modern Data Architecture (MEDA)')

No

Don't know (Go to 'Modern Data Architecture (MEDA)')

Against MEDA

30. Why not?

Modern Energy Data Architecture (MEDA)

31. Are there other related data platforms that you think the Open Public Chargepoint Data should be linked to?

- Yes
- No (Go to 'Pricing standards')
- Don't know? (Go to 'Pricing standards')

Other data platforms

32. What data platforms?

Pricing standards

We believe EV drivers should be able to compare the cost of charging between different networks easily.

Electricity drawn from public chargepoints by EVs is currently priced using a range of different metrics. This:

- creates confusion for EV drivers
- means a lack of comparability of pricing information between different chargepoint networks

We propose to mandating chargepoint operators to adopt a p/kWh metric for every unit of electricity sold under subscription and pay as you go models.

The chargepoint operators would retain flexibility on how they display pricing, consumption and cost information to the customer.

The accepted exemptions to these requirements are:

- chargepoint operators to provide free charging under their membership models (the kWhs drawn must be made available to the consumer after the charging event as required by current regulations)
- parking and charging bundled offers, where both are provided in a one-off fee (the kWhs drawn must be made available to the consumer after the charge as required by current regulations)
- chargepoint operators applying overstay charges to prevent drivers blocking a parking space after their charging session has ended

33. Do you agree we should mandate a p/kWh metric?

- Yes (Go to 'Pricing standards')
- No
- Don't know? (Go to 'Pricing standards')

Against metric

34. Why not?

Pricing standards

35. Do you agree we should allow chargepoint operators to have the flexibility to determine how the:

	Yes	No	Don't know?
cost of charging is made available to a consumer?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
energy consumed is made available to the consumer?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
total cost of a charging event is made available to a consumer?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The accepted exemptions to these requirements are:

- chargepoint operators to provide free charging under their membership models (the kWhs drawn must be made available to the consumer after the charging event as required by current regulations)
- parking and charging bundled offers, where both are provided in a one-off fee (the kWhs drawn must be made available to the consumer after the charge as required by current regulations)
- chargepoint operators applying overstay charges to prevent drivers blocking a parking space after their charging session has ended

36. Do you agree with our exemptions?

- Yes (Go to 'Pricing standards')
- Yes, but I have others
- No, I have alternatives
- No, I disagree with these exemptions (Go to 'Pricing standards')

Other exemptions

37. What others do you think we should consider?

Pricing standards

The cost to the driver will be based on the quantity of electricity supplied as determined by a meter and for the most accurate reading require that all newly installed must comply with the [Measuring Instrument Regulations 2016 \(MIR\) \[opens in a new window\]](#) to:

- avoid inaccurate measures
- short changing the driver

We understand that it will be costly for chargepoint operators to have to retrofit their charging fleet with MIR compliant meters and have therefore limited this requirement to newly installed or renewed chargepoints only.

38. Do you agree that MIR compliant meters should be mandated in:

	Yes	No	Don't know?
newly installed alternative current (AC) chargepoints?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
newly installed direct current (DC) chargepoints?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
renewed AC chargepoints?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
renewed DC chargepoints?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If not, why not?

Reliability

We believe consumers must have access to a consistently reliable public charging network.

Public chargepoint reliability has improved with internal analysis showing that in August 2019 approximately 8% of public chargepoints were out of service - a decrease from 15% in 2017. However we believe further improvements are required to drive consumer confidence in the public network.

We are proposing that chargepoint operators must:

- meet a minimum 99% average availability standard across their fleet of chargepoints and we would expect industry to work with us to identify an effective approach to monitoring this reliability
- provide a 24/7 call helpline for consumers so that assistance is provided to consumers struggling to access or use a chargepoint

We are suggesting chargepoint operators have a one-year lead time period from when the regulations come into force comply with these standards.

39. Do you agree that a reliability measure should be set?

Yes

No

Don't know? (Go to 'Reliability')

99% reliability

40. Do you agree that the 99% availability standard should be used as a fleet wide average?

Yes

No

Don't know?

41. Do you have any other solutions to achieve a more reliable network?

No

Reliability

42. 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?

Yes

No

Don't know?

43. What types of failures should be exempt from the reliability compliance?

Don't know

Reliability

44. Do you agree we should mandate that chargepoint operators provide 24/7 call centres?

Yes

- No (Go to Impact assessment')
- Don't know? (Go to Impact assessment')

Call centres

45. In your opinion should these call centres be mandated so that calling is:

low cost?

free?

another option?

Impact assessment

A detailed impact assessment will be carried out drawing on the evidence gathered from this consultation. We expect the proposals in this consultation to result in hardware, software and operating costs to:

- retrofit and install necessary equipment to all existing and new chargepoints to meet the minimum payment requirements (minimum payment requirements)
- upgrade the chargepoint network to provide a QR code facility (roaming)
- establish an interoperable roaming platform (roaming)
- open chargepoint networks to any accredited third party eMSP (roaming)
- gather and present 'must have' data (open data)
- adopt a p/kWh metric for a unit of electricity (price transparency)
- meet a 99% availability standard and provide a 24/7 helpline (reliability)

We expect these costs to be offset by improvements in the consumer experience due to reduced search time, payment time, time planning journeys and increased comparability of prices enabling consumers to select the lowest price.

46. 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).

Attach your evidence to your return

Comments:

47. Do you think there are other impacts that have not been identified?

- Yes
- No (Go to Impact assessment')
- Don't know? (Go to Impact assessment')

Other impacts

48. What other impacts are there that you think have not been included (provide supporting evidence)?

Attach your evidence to your return

Comments:

Impact assessment

49. Are there any groups you expect would be uniquely impacted by these proposals, for example small businesses or people from protected categories?

- Yes
- No (Go to 'Consumer protection')
- Don't know? (Go to 'Consumer protection')

Groups

50. Which groups do you expect would be uniquely impacted by each of these proposals (provide supporting evidence)?

Attach your evidence to your return

Comments:

Consumer protection

We believe consumers need EV charging to be as easy, if not easier, than current re-fuelling practices.

Consumer protection is an area of growing importance which cuts across private and public spheres. We are not proposing anything at this stage but invite views on consumer protection.

51. Do you have concerns about consumer protection related to the use of public chargepoints that haven't been discussed in this consultation?

- Yes
- No (Go to 'Accessibility')
- Don't know? (Go to 'Accessibility')

Other consumer protection issues

52. What other consumer protection issues do you believe should be considered by us, providing any reasoning, analysis and evidence?

Accessibility

We believe anyone, regardless of their mobility, should be able to access EV chargepoints however currently there is little in the way of regulation that specifically directs:

- chargepoint operators
- local authorities

to make chargepoints accessible to those with disabilities.

We believe having a reliable mode of transport is particularly important to those who have a disability and paramount to their independence with this extending to the reliability that they can use their vehicle.

Currently there are concerns around the provisions for disabled users at charge points with these ranging from high raised kerbs, insufficient space around bays to charging cables as tripping hazards.

We believe that any new and emerging technology is user-friendly both to:

- support individual drivers
- encourage the widespread take up of EVs

As this responsibility would fall across number of parties we want to continue working with:

- consumer representatives
- chargepoint operators
- local authorities
- other interested parties

to understand main issues and whether there is a need for central government intervention. Supervised chargepoint hubs could provide a method to assist those with accessibility needs.

53. Do you agree with the accessibility issues raised?

Yes, but other issues should be considered

Yes and no other issues should be considered (Go to 'Accessibility')

- No, alternative issues should be considered
- No and no other issues should be considered (Go to 'Accessibility')

Other accessibility issues

54. What are the other accessibility issues you think we should regulate on?

Accessibility

55. Should, in your opinion, there be standards that are enforced across chargepoints (for example payment height, instructions and so on)?

- Yes
- No (Go to 'Accessibility')
- Don't know? (Go to 'Accessibility')

Chargepoint standards

56. What standards?

Don't know

Accessibility

57. Do, in your opinion, chargepoint operators need to provide supervised stations to help assist those with accessibility needs?

- Yes

- No
- Don't know?

Weatherproofing and lighting

Chargepoints are installed in a diverse range of locations, often in more isolated locations than is the case for fuel stations for diesel or petrol vehicles.

One type of charging location where consumers can feel safe and covered is in a charging hub. Government, Innovate UK and industry have invested in hubs across the UK. Many are installed with roofing and lighting, solving issues surrounding weatherproofing, lighting and signage.

However, much of the charging on the public network will not be in these types of larger charging hubs. We are interested in views as to extent to which requirements are needed to provide specific lighting and/or weather proofing arrangements in other settings. We need to balance providing a safe experience for EV consumers with risk of additional cost and negative impact on local areas' work to reduce street furniture.

58. In your opinion does the lack of:

	Yes	No	Don't know?
weatherproofing at the majority of chargepoints require improvement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
lighting at the majority of chargepoints require improvement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If yes, what improvements?

For new installations improvements should be made in rural locations, such as the dales or national parks, which need additional protection from the elements these should include but not be limited to protective shelter and watertight and dustproof casing. Lighting in some rural locations would need to be considerate of the status of the location, for example, we have some designated dark sky environments so low level lighting on the column would be expected as a minimum.

59. Should any improvement from us apply:

to all chargepoints? (Go to 'Signage')

only to those in specific locations?

Specific locations

60. Which locations and why?

Signage

Drivers need to be able to locate chargepoints quickly and easily while driving. One option to support this would be to introduce signage requirements. We want to balance EV signage requirements with local approaches to reducing street clutter. There are several existing policies to support locating individual charging points. We do not think additional mandatory requirements are required at this stage. However, we welcome views on this.

61. In your opinion is signage to chargepoints an area that requires improvement from us?

- Yes
- No (Go to 'Final comments')
- Don't know? (Go to 'Final comments')

Signage action

62. What improvements would you like to see taken?

a reduction of size as a minimum, if this is standardised across the UK it needs to be a smaller, more elegant solution with clear instructions. Perhaps add a QR code or telephone number for 'more information'

Final comments

63. Any other comments?

The cost of registration to the FCA could be prohibitive for start-ups, potentially limiting innovation

Initial equality impact assessment screening form			
<p>This form records an equality screening process to determine the relevance of equality to a proposal, and a decision whether or not a full EIA would be appropriate or proportionate.</p>			
Directorate	BES		
Service area	H&T		
Proposal being screened	DfT/OZEV EV Charge Point Consumer Consultation Response		
Officer(s) carrying out screening	Keisha Moore		
What are you proposing to do?	<ul style="list-style-type: none"> To seek approval to submit a response to the consultation 		
Why are you proposing this? What are the desired outcomes?	<ul style="list-style-type: none"> To submit a response to the consultation 		
Does the proposal involve a significant commitment or removal of resources? Please give details.	No		
<p>Impact on people with any of the following protected characteristics as defined by the Equality Act 2010, or NYCC's additional agreed characteristics</p> <p>As part of this assessment, please consider the following questions:</p> <ul style="list-style-type: none"> To what extent is this service used by particular groups of people with protected characteristics? Does the proposal relate to functions that previous consultation has identified as important? Do different groups have different needs or experiences in the area the proposal relates to? <p>If for any characteristic it is considered that there is likely to be an adverse impact or you have ticked 'Don't know/no info available', then a full EIA should be carried out where this is proportionate. You are advised to speak to your Equality rep for advice if you are in any doubt.</p>			
Protected characteristic	Potential for adverse impact		Don't know/No info available
	Yes	No	
Age		X	
Disability		X	
Sex		X	
Race		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage or civil partnership		X	
NYCC additional characteristics			
People in rural areas		X	
People on a low income		X	
Carer (unpaid family or friend)		X	
Does the proposal relate to an area where there are known inequalities/probable impacts (e.g.	No.		

disabled people's access to public transport)? Please give details.				
Will the proposal have a significant effect on how other organisations operate? (e.g. partners, funding criteria, etc.). Do any of these organisations support people with protected characteristics? Please explain why you have reached this conclusion.	This may/will have an impact on other organisations in the future but not as a result of this specific report. Any such impacts will be as a result of decisions made by Government on all of the responses received, not just NYCC response.			
Decision (Please tick one option)	EIA not relevant or proportionate:	X	Continue to full EIA:	
Reason for decision	<p>This is a response to the Department for Transport (DfT) and Office for Zero Emissions (OZEV) EV Charge Point Consumer Survey to advise the government on the installation and operation of EV charging points. As there are no changes to services from this response, there is no impact on people with protected characteristics. It is recognised that any changes made by government based on all consultation responses may have an impact but would be assessed accordingly.</p> <p>There are questions in the consultation on disabled access to such points that we have considered and provided an answers that has been reviewed as part of the equalities impact assessment.</p>			
Signed (Assistant Director or equivalent)	Barrie Mason			
Date	16/03/21			



Climate change impact assessment

The purpose of this assessment is to help us understand the likely impacts of our decisions on the environment of North Yorkshire and on our aspiration to achieve net carbon neutrality by 2030, or as close to that date as possible. The intention is to mitigate negative effects and identify projects which will have positive effects.

This document should be completed in consultation with the supporting guidance. The final document will be published as part of the decision making process and should be written in Plain English.

If you have any additional queries which are not covered by the guidance please email climatechange@northyorks.gov.uk

Please note: You may not need to undertake this assessment if your proposal will be subject to any of the following:

Planning Permission
Environmental Impact Assessment
Strategic Environmental Assessment

However, you will still need to summarise your findings in in the summary section of the form below.

Please contact climatechange@northyorks.gov.uk for advice.

Title of proposal	DfT/OZEV EV Charge Point Consumer Consultation Response
Brief description of proposal	To provide Members with outline details of the Department for Transport (DfT) and Office for Zero Emissions (OZEV) EV Charge Point Consumer Survey response being submitted by the County Council
Directorate	BES
Service area	H&T
Lead officer	Keisha Moore
Names and roles of other people involved in carrying out the impact assessment	
Date impact assessment started	11/03/2021

Options appraisal

Were any other options considered in trying to achieve the aim of this project? If so, please give brief details and explain why alternative options were not progressed.

No

What impact will this proposal have on council budgets? Will it be cost neutral, have increased cost or reduce costs?

Please explain briefly why this will be the result, detailing estimated savings or costs where this is possible.

None, no funding is being requested as a result of this report however, the Corporate Director – BES and BES Exec Member for Access may wish to use the report to consider the opportunities to deliver the Council’s climate change objectives and when prioritising investment.

APPENDIX C

<p>How will this proposal impact on the environment?</p> <p>N.B. There may be short term negative impact and longer term positive impact. Please include all potential impacts over the lifetime of a project and provide an explanation.</p>	<p>Positive impact (Place a X in the box below where relevant)</p>	<p>No impact (Place a X in the box below where relevant)</p>	<p>Negative impact (Place a X in the box below where relevant)</p>	<p>Explain why will it have this effect and over what timescale?</p> <p>Where possible/relevant please include:</p> <ul style="list-style-type: none"> • Changes over and above business as usual • Evidence or measurement of effect • Figures for CO₂e • Links to relevant documents 	<p>Explain how you plan to mitigate any negative impacts.</p>	<p>Explain how you plan to improve any positive outcomes as far as possible.</p>
<p>Minimise greenhouse gas emissions e.g. reducing emissions from travel, increasing energy efficiencies etc.</p>	Emissions from travel	X				
	Emissions from construction	X				
	Emissions from running of buildings	X				
	Other	X				
<p>Minimise waste: Reduce, reuse, recycle and compost e.g. reducing use of single use plastic</p>		X				
<p>Reduce water consumption</p>		X				
<p>Minimise pollution (including air, land, water, light and noise)</p>		X				

<p>How will this proposal impact on the environment?</p> <p>N.B. There may be short term negative impact and longer term positive impact. Please include all potential impacts over the lifetime of a project and provide an explanation.</p>	<p>Positive impact (Place a X in the box below where relevant)</p>	<p>No impact (Place a X in the box below where relevant)</p>	<p>Negative impact (Place a X in the box below where relevant)</p>	<p>Explain why will it have this effect and over what timescale?</p> <p>Where possible/relevant please include:</p> <ul style="list-style-type: none"> Changes over and above business as usual Evidence or measurement of effect Figures for CO₂e Links to relevant documents 	<p>Explain how you plan to mitigate any negative impacts.</p>	<p>Explain how you plan to improve any positive outcomes as far as possible.</p>
<p>Ensure resilience to the effects of climate change e.g. reducing flood risk, mitigating effects of drier, hotter summers</p>		<p>X</p>				
<p>Enhance conservation and wildlife</p>		<p>X</p>				
<p>Safeguard the distinctive characteristics, features and special qualities of North Yorkshire's landscape</p>		<p>X</p>				
<p>Other (please state below)</p>		<p>X</p>				

Are there any recognised good practice environmental standards in relation to this proposal? If so, please detail how this proposal meets those standards.

N/A

Summary Summarise the findings of your impact assessment, including impacts, the recommendation in relation to addressing impacts, including any legal advice, and next steps. This summary should be used as part of the report to the decision maker.

This consultation seeks views on proposals that mean current and future EV drivers will be able to locate available charge points simply, pay for a charge more easily and recharge their cars more reliably, regardless of where they are going in the UK. The outcomes of the study are aimed at supporting a reduction in carbon emissions and improving the environment. BES Executive Members may wish to consider the opportunities to deliver the Council's climate change objectives in light of this and when prioritising investment.

Sign off section

This climate change impact assessment was completed by:

Name	Keisha Moore
Job title	Senior Transport Planning Officer
Service area	BES
Directorate	H&T
Signature	Keisha Moore
Completion date	11/03/2021

Authorised by relevant Assistant Director (signature): Barrie Mason

Date: 16/03/21