

Irish Electric Vehicles Owners Association
(IEVOA)
Submission to the CER
on the
ESBN Electric Vehicle Pilot and Associated Assets
Consultation

Background

The IEVOA is a voluntary body representing owners and users of all types of electric vehicles (EVs) and plug-in hybrids in Ireland. It advocates for the use of EVs, campaigns on behalf of EV users for improved facilities and issues that concern EV users. It runs rallies to interesting venues, an annual national photographic rally, promotes the advantages of EVs and carries out awareness raising activities, like presentations to schools and other interested bodies.

The IEVOA maintains regular contact with ESB ECars, the SEAI and other bodies and relevant government departments . Our website is at <http://www.irishevowners.ie>

Submission

The IEVOA would agree that the CER has a reasonable set of broad non contentious objectives for EV policy.

However the IEVOA, notes, with concern, that the CER policy has no mention of the strategic value of the public charger network in assisting the Governments stated objective to affect the decarbonisation of private transport and in particular to achieve 50,000 EVs by 2020.

The IEVOA would strongly contend that the public charger network, developed using a proportion of the DUoS charges, should play such a strategic role in developing EV usage and that strategic objective should have priority in the medium term over simple commercialisation of the public charging network.

Selection of Ownership Option

On the basis of the options advanced by the ESB, The IEVOA strongly supports Option 1, on the following basis

- (1) The network should be placed into the Regulated Asset Base, in order to protect the investment to date by DUoS contributors
- (2) Further development of the network, especially given Irelands population densities, will require a long term view and availability of capital to expand the network, that will not be justified by commercial operators, given the current low EV usage , especially in areas away from the GDA (Greater Dublin Area).
- (3) in addition, new technology, greater range and the establishment of EV usage patterns, will mean, new additional and upgraded chargers and locations will be needed and these upgrades and new locations will need to be developed in advance of commercial demand, this will require the resources of the State or the DUoS, as

opposed to commercial capital in the medium term.

- (4) Commercialisation, particularly, unregulated commercialisation, as described in options 2,3 and 4 is not appropriate for the current state of the EV market in Ireland, which has approx 2000 EVs on the road, this is by far too small a population to support effective commercialisation at this time or in the immediate future. Evidence in other countries would suggest that a user base in excess of 10,000 EVs would be a minimum for limited commercialisation.
- (5) Premature commercialisation would seriously affect new EV take-up, anecdotal evidence suggests that many EVs are acquired because of perceived low running costs and the assistance at present, of free charging, is a clear incentive.
- (6) In time, with the growth of EVs and the achievement of penetration targets, The charging network will be a valuable asset and an appropriate sell-off or controlled commercialisation will return significant gains to the DUoS base. At present, with low EV presence, the commercial value is unknown and a premature sell off could realise significant losses for the DUoS base.
- (7) Maintaining a consistent network with one access control method throughout the country is extremely valuable and avoids the mistakes made in other countries that have ended up with multiple charger networks with different access control methods, requiring users to maintain multiple smart cards, top-up accounts etc
- (8) To achieve, the States strategic targets in relation to EVs will require continued access to low cost (or for a time , no-cost) public charging, hence any transfer of ownership to an unregulated body risks the potential for unwise and premature commercialisation , unsuitable pricing regimes and lack of potential future competition leading to low EV uptake and the risk of an under-developed charging network.

The IEVOA is not opposed to a pricing regime for the use of public chargers at the appropriate time, when the adoption of EVs, in sufficient numbers, is such that a reasonable user base is present to support commercialisation and that adequate competitive forces are present to ensure efficient pricing.

The Issue of Electricity Supply Licenses

The IEVOA would strongly disagree that EV users are not “ consumers of electricity “. The most popular method (despite badly supported arguments to the contrary) is and will be in the future, charging at home. In this case EV users pay by KWH (Unit) of charge used in their cars.

This is the fairest way to charge EV users, and hence is also the fairest way to potentially charge EV users at the public charger network.

Pricing by KWH, ensures that EV with different battery sizes, EVs with older less efficient or depleted batteries are all charged the same, for the same electricity consumed. Without the necessary Electricity Supply Licenses, charger operators would be forced to sell by “ time “, which leads to individuals receiving the same electrical amount but paying different rates. Imagine if

forecourt petrol refuelling was priced by flow rate !!! . For example, EV batteries are significantly affected by cold weather and take longer to charge in winter, time based pricing would penalise winter charging over summer months !. Equally EVs have different on board charger and charge regimes, meaning that cars have a variety of time-to-charge rates, slower cars should not be penalised simply on that basis.

The IEVOA would therefore strongly contend, that operators supplying public charging are so licensed and sell by unit of electricity. Overstay and hogging issues can be addressed by penalty time based charges, after a reasonable charge cycle is completed.

Furthermore the IEVOA would contend that competition could be ensured by ensuring that EV users were billed by current domestic retail electrical supply companies, which could then develop price plans that suit EV owners in conjunction with their existing domestic price plans for electricity and gas etc . Visitors and occasional users could be handled by simple top-up, pay as you go solutions.

Users could therefore shop around for the best combination of combined Gas, domestic electricity and EV charge rates as they do today for domestic only pricing.

Summary

The IEVOA would strongly contend, therefore that the most appropriate strategy requires the chargers to be viewed in the same manner as the existing Distribution Grid , in effect a national strategic asset. Given the range of options offered, this is therefore to place the chargers in the RAB .

The ownership and benefits of the asset remain within CER control, allowing it to give effect to the States target for the decarbonisation of private transport , expand and develop the charger network, to provide national coverage, not strictly bound by purely commercial objectives and to ensure a fair and level playing field, when at the appropriate time, a pricing regime based on energy consumed is introduced for the charger network. The combination of this strategic asset, along with other EV incentives would therefore greatly accelerate the necessary take-up of EVs and ensure the long term value of the charger network to the DUoS user base.

In time and consistent with EV growth and national policy , significant future value could be realised for the DUoS user base, with the potential for a sell-off of the network.