

Electric Vehicle Charging in Residential and Non-Residential buildings

Citizens Advice's response
to DfT's consultation



Introduction

Citizens Advice provides free, independent and impartial advice to anyone who needs it. We are the statutory advocate for energy and post consumers and run the national consumer helpline. Last year we helped 2.7 million people with 6.3 million problems.

Through our helpline we have been receiving calls from electric vehicle (EV) drivers regarding cases of mis-selling, faulty chargers and cables, and unsatisfactory user experiences with their car and chargers. We have shared these cases with the Office for Low Emission Vehicles.

We welcome the ambition of the government's plans to provide more chargers for EV drivers. However, in meeting the need for more chargers, government should also acknowledge the cost that may fall on all electricity bill payers, as they will partially fund grid reinforcement costs. This is not a reason to hesitate in the build-out of charging infrastructure but a call to pay more attention to which groups will carry a greater or lesser burden of decarbonisation costs. This is why Citizens Advice has called for an independent commission that would work through the implications of how low-carbon transition should be paid for, and present recommendations to government on how to proceed.¹

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<https://wearecitizensadvice.org.uk/the-costs-of-decarbonisation-must-not-hit-those-who-can-lead-afford-it-bde29a4309d7>

Consultation responses

Q19: How can the government apply these regulations in a way which balances the benefit to EV drivers and the requirements of the EPBD, with the burden on landowners?

When implementing these regulations, the government should be mindful of the following risks.

- **Accessibility:** the government should consider how the chargepoints installed will be accessible for all, including disabled drivers more reliant on private vehicles.
- **Planning:** the government must ensure there is a proportionate response which considers how to limit the risk of stranded chargepoints or assets - especially if consumers choose to use other mobility options or technology becomes outdated before there is significant EV uptake.
- **Maintenance:** there should be some consideration of the long term maintenance costs of a chargepoint and what implications this may have for households. Our understanding is that this could be as much as £250/year and could involve home visits.

48. Do you think we should apply an exemption to our proposal to require a chargepoint in every new home when the grid connection cost is high?

No

49. Why not, including any potential exemption you think is suitable?

We are concerned that exemptions to any of the policies set out in this consultation may lead to a postcode lottery in terms of charger availability. People who happen to live on a constrained part of the electricity network would have fewer chargers available.

The exemption based on a simple grid connection cost factor at a moment in time doesn't take into account wider electrification that we may see as part of the UK's decarbonisation journey. Grid reinforcement in an area may initially be triggered by EV chargers but the extra capacity may be used for electric heating and generated solar power later on.

Ofgem, as part of its Access and Forward Looking Charge Significant Code review is presently reviewing how network charges are structured and calculated. We

suggest government follows this review closely as it may affect what costs developers have to pay for.

69. Do you think there are groups who would be impacted by these regulations that have not been captured by this assessment?

Yes

70. What additional groups and why?

The impact assessment does not give due recognition to the costs borne by electricity bill payers. The impact assessment merely acknowledges that costs may be socialised “depending on the development type and whether it is new build or retrofit”.

We understand that electricity bill payers will pay for upgrades to domestic fuses and cut outs if these need to be changed as a result of domestic EV charging, as well as wider reinforcement costs triggered at higher voltage levels by developers or businesses installing EV chargers.

Citizens Advice recognises that it is difficult to predict the exact costs that will fall on electricity bill payers as a result, as network connection costs and reinforcement needs are highly locational. However, an attempt at rough lower and upper cost expectation should be made. We believe this to be an important exercise to recognise how, cumulatively, electricity bill payers will pay for the electricity network that will enable decarbonising transport, heat and energy. This includes current and future electricity bill payers, since reinforcement costs are spread across bills over a 45 year period.

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