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Responding to the CMA's electric vehicle charging market study

Citizens Advice provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. We are the statutory representative for domestic and small business energy consumers across Great Britain.

We welcome the opportunity to respond to this invitation to comment. This document is entirely non-confidential and may be published on your website.

Theme 1: Developing competition while incentivising investment

- *Competition between different EV charging providers*

To achieve adequate competition in the public charging market, consumers need to have access to a range of EV charging providers, accessible payment methods, comparable pricing structures and the knowledge and support to make decisions that are right for them.

In some areas, the market has improved in recent months with many new commercial agreements enabling roaming between different chargepoint operators. For example Octopus Energy launched its Octopus Electric Juice service¹, Zap Map launched Zap Pay² and there were some individual agreements signed like the one between New Motion and Char.gy³. More generally, EV Roam⁴ was also established to support the communication between different chargepoint operators.

These industry led solutions are a welcome first step in establishing how roaming may be enabled, however it is some way off the scale of roaming required to ensure consumers can easily use different chargepoints. Using market shares as of July 2020, a significant proportion of the market have not yet signed any roaming agreement⁵ and individual roaming platforms only provide consumers access with the chargepoint

¹ [Octopus Electric Juice](#), 2021

² [Zap Pay](#), 2021

³ [New Motion signs roaming agreement with Char.gy](#), 2020

⁴ [EV Roam](#), 2020

⁵ [Zap-insights: UK network market share](#), 2020

operators signed up to those platforms. This indicates more work needed in this area to enable roaming services, fully.

While the network of chargepoints is growing, in the short term many people have unequal access to charging services or limited chargepoints near their dwelling⁶. This will undoubtedly affect the options many drivers feel they have to choose from when charging, especially if they do not have access to private chargepoints.

- *Competition from different sector segments*

In the home charging market, more car manufacturers, energy companies and chargepoint operators are working together to bundle products and services. These offers can be advantageous for both consumers and companies — it simplifies the process for the former and finalises sales at relevant touchpoints for the latter.

But, it's not clear if people are getting good value or whether having bundled services with multiple suppliers will mean they have less freedom when making decisions about energy in their homes or for their vehicles in the long term, even after the initial contract has ended. We recommend the CMA considers some further research to understand these offers and any long term risks or implications for consumers, considering future changes in the market as well⁷.

Theme 2: Effective consumer interaction with the sector

- *Barriers or challenges related to chargepoints*

As with any new technology, barriers when charging at home often relate to being unfamiliar with the requirements and impacts of having the new technology.

Contacts to the Citizens Advice service about electric vehicles and charging identify mis-selling and misadvertising as an issue consumers face at multiple points in the customer journey. However, this is particularly the case when choosing to buy an electric vehicle. Consumers have expressed concern and, sometimes, feel misled in relation to battery performance, chargepoint access, chargepoint speed and installation of the chargepoint.

When consumers install chargepoints at their homes, it is sometimes the case that they need to take additional, unforeseen, actions as part of the installation process. For example, upgrading the fuse board, cut outs, single phase to three phase electricity supply and meter tails. Some of these will be free to the individual (a socialised cost for all electricity consumers) and others will be directly charged to the consumer and could be relatively expensive (thousands of pounds).

⁶ [National Ranking of EV Charge Point Coverage](#), 2020, ZapMap

⁷ [Future for all](#), 2019, Citizens Advice

Following the installation process, not all consumers are aware of electricity tariffs designed for electric vehicle drivers or feel able to compare the tariffs available to them to check which one might suit their charging habits the best. Energy suppliers have clear obligations under sectoral licence conditions to inform and support their customers to choose the right tariff. However, this requires energy suppliers to be aware that their customer has an electric vehicle in the first place.

Whilst there are many EV specific price comparison websites⁸, electric vehicle tariffs are still not available on all of the larger, popular comparison sites. The smarter price comparison tool⁹ being designed by BEIS and Hildebrand is a useful first step to enabling larger comparison sites to compare EV tariffs and we will be monitoring the take up of that tool following successful completion of the project.

There are also some barriers to adopting new tariffs that emerge from not having the right meter, the meter is faulty or not being able to have one installed in the future (for example, you may face barriers in having a smart meter installed). Contacts to Citizens Advice also highlight a number of queries about this.

Some services, enabled by smart chargers, pose accessibility barriers for different types of consumers. Depending on the design of the offer, different circumstances could prevent consumers from taking them up. For example, digital confidence or exclusion, living in the private rented sector (and the autonomy to install a charger or sign up to new services), or lacking trust or motivation to engage¹⁰ have all been identified as significant barriers. Citizens Advice expects these offers to be made inclusive by design to develop a market that works for all. We strongly urge the CMA to consider this in its market study.

In relation to public charging, the most common barriers consumers face relate to unreliable chargepoints (for example, chargepoints falling into disrepair), unclear pricing, inaccessible payment methods and inability to find public chargers¹¹. These are also issues people come to Citizens Advice about, sometimes leading to consumers feeling they have been charged too much, without the ability to challenge or seek redress.

There are also accessibility barriers for chargers, for example heavy and difficult to use cables for disabled people or the location of where chargers are installed in unlit areas, feeling unsafe for many.

- *What information do consumers need at what stage in the decision making process*

⁸ [Rightcharge](#), [PowermyEV](#) and [smarthomecharge](#), 2021

⁹ [Smart meter enabled price comparison tool](#) project, 2020

¹⁰ [Future for all](#), 2019, Citizens Advice

¹¹ [Driving up standards in public charging](#), 2020

Depending on their situation and charging requirements, consumers could need a raft of information at different stages of the customer journey to decide which options might be best for them.

For example, to determine if and which chargepoint you'd like to purchase, you might want to know if you'll need to make any upgrades to your home (fuses, cut outs, three phase supply), what other EV services you want to sign up to (vehicle to home or grid) and sometimes depends on the car chosen and associated warranties. This might not align well with the typical journey of buying a bundled package or the linear route of buying a vehicle, charger and charging service. We have received contacts when one element of a 'bundle' is not possible and consumers feel short changed and struggle to understand their rights.

Over time, such decisions should become easier and less detailed information will be necessary as consumers become familiar with the technology. However, in the short term the relative lack of information could hamper market development. In addition to information, tools that offer tailored support can further improve outcomes for people in this market. For example, understanding people's lifestyle or driving habits before recommending which types of services and technologies will work best for them.

In the public charging market, consumers should have access to clear information about the cost of charging, parking and any planned incentives or disincentives to encourage them to stay parked near a chargepoint for only as long as their planned charging requires. People may also benefit from being able to identify where nearby chargepoints are located, whether they are currently available or not, how much they might cost (in a comparable unit) and what charging speed they might offer. Making data from public chargepoints publically available would support private companies to offer tools, better supporting how people are likely to come across this information and at times most useful to them.

- *Existing protections offered to consumers*

The protection offered to consumers is likely to be different depending on how they have bought goods and services. If a consumer buys their charger as part of their electricity supply contract, they are subject to sectoral consumer protections. These offer a higher level of protection. For example, general consumer protection prevents companies from mis-selling whereas energy sector consumer protection requires companies to treat their customers fairly, and provide information about the most appropriate option for them¹². General consumer protection also provides limited protection for microbusiness consumers, does not require any tailored support for consumers in vulnerable circumstances and is often difficult to use as a consumer.

¹² [Stuck in the middle](#), 2020, Citizens Advice

In relation to demand side response offers for EVs, Citizens Advice has identified a range of potential risks and mapped the current consumer protection available¹³. This identifies the need for greater sectoral protection for third party intermediaries.

- *What else is required for the EV charging sector to be responsive to consumers needs*

Though many firms are well established in the industry, the sector as a whole is still nascent and there is still only a small, albeit growing, percentage of drivers choosing to purchase and use electric vehicles.

As a result, a huge emphasis has been placed on information, communication and support. Undoubtedly, these are important elements to enable more people to take up electric vehicles. However information alone does not protect consumers completely, recognising that information can sometimes be hard to understand and people often live busy lives, finding it hard to be completely informed.

An important part of the market must, therefore, include strong exit protections from contracts as well as access to good complaints handling between companies, independent advice and redress.

Finally, we are pleased to see the CMA consider this market at such an early stage to support its development. Please do get in touch if you would like to discuss any points raised in this letter or for further elaboration.

Yours sincerely,

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¹³ [Demanding attention](#), 2021, Citizens Advice