The consumer experience at public chargepoints

Citizens Advice response
to DfT and OZEV
consultation April 2021

About Citizens Advice

Citizens Advice provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. It values diversity, promotes equality and challenges discrimination. From 1 April 2014, Citizens Advice took on the powers of Consumer Futures to become the statutory representative for energy consumers across Great Britain. The service aims:

- To provide the advice people need for the problems they face
- To improve the policies and practices that affect people's lives.

Citizens Advice is a network of nearly 300 independent advice centres that provide free, impartial advice from more than 2,900 locations in England and Wales, including GPs' surgeries, hospitals, community centres, county courts and magistrates courts, and mobile services both in rural areas and to serve particularly dispersed groups. We give advice to people through our network of local Citizens Advice and through our national consumer service helpline. Between these 2 services, last year we advised over 130,000 people, solving 100,000 problems. Over 25,000 people saved money because of our advice. We also offer specialist support to the people who need our help most through the Extra Help Unit, where we dealt with over 15,000 cases. Since April 2012 we have also operated the Citizens Advice consumer service, formerly run as Consumer Direct by the Office for Fair Trading (OFT). This telephone helpline covers Great Britain and provides free, confidential and impartial advice on all consumer issues. This document is entirely non-confidential and may be published on your website. If you would like to discuss any matter raised in more detail please do not hesitate to get in contact.

citizens advice

Introduction

Citizens Advice welcomes this consultation from the Department for Transport (DfT) and the Office for Zero Emissions Vehicles (OZEV), to improve the consumer experience at electric vehicle (EV) public chargepoints.

Achieving the government's target of net zero emissions by 2050 will depend on the decarbonisation of our transport system, and switching to EVs will be a central pillar of this. The public charging infrastructure will be essential, especially for people who are unable to charge their EV at home. But at the moment, public charging options are inconvenient, unreliable and difficult to use.

Last year we responded to the government's call for evidence on the consumer experience of public charging, drawing from a year's worth of evidence from Twitter which we analysed using a programme called Method52[1]. We highlighted problems in 4 key areas: payment, data availability, reliability, and pricing transparency.

In preparation for this consultation response, we have updated this analysis with a further 7 months of Tweets (Jul 2020 - February 2021). Across these areas the same consumer problems remain, which is why we are pleased the government is making proposals to address these problems. We have considered the proposals in each of these 4 areas.

Payment methods

Consumers regularly complain that accessing public chargepoints is complicated. They regularly have to download and use multiple apps and RFID cards to pay for chargepoints. We found this type of problem in 19% of the complaints that we identified on Twitter.

We are pleased the consultation includes proposals that would require CPOs to mandate minimum payment methods which don't require a mobile or fixed internet connection. Proposals aimed at implementing a roaming solution are also welcome, and should be developed as soon as possible.

Provision of data

[1] More information about method52 can be found here.

In 19% of the tweets we looked at, people complained about the quality of the data about chargepoints on apps. Issues include chargepoints that are missing from apps, broken chargepoints showing as working, and displaying incorrect price information. We support the proposal to adopt a standard for openly available data, and to mandate that data including location, power-rating and pricing is made available. This will be essential to ensure that consumers can have a full, live picture of their charging options.

Price transparency

The cost of charging at a public chargepoint can be difficult to understand, with 7% of the Twitter complaints we identified relating to this type of issue. In response to the consultation of June 2020 we called for the introduction of a p/kwh metric, and we are pleased to see this being proposed.[2]

We understand that certain proposed exemptions to this metric are necessary. However, the government should be cautious about the possible unintended incentives that this could place on companies, and keep this under review.

Reliability

In 58% of the complaints we analysed, people experienced problems when using a public chargepoint. Addressing these problems will be essential to improve consumer experience and confidence in EVs.

We therefore support the proposal to introduce a minimum availability metric of 99%, and think that this should be introduced as soon as possible. We also know that even with the right standards in place, things can still go wrong. That's why we support the government's decision to make it mandatory for chargepoint operators (CPOs) to provide a 24/7 helpline for consumers.

Accessibility

Alongside the proposals in this document in the above 4 areas, we are pleased to see the government seeking evidence on accessibility and safety. Evidence shows[3] that many disabled users often struggle to access EV public chargepoints, and we think that the government should work with relevant stakeholders to regulate in this area.

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[2]Citizens Advice, Consultation response on improving the consumer experience of using public chargers, 2020

[3]Citizens Advice, Electric Vehicle charging infrastructure for people living with disabilities, 2020

Section 1: Payment methods

Q1: Are you in agreement that the payments specified should be allowed as acceptable payment options? If you don't agree, please set out why.

Citizens Advice understands that suppliers are likely to offer a number of impromptu solutions to consumers at different chargepoints (contactless card payment, QR card etc). We also expect there to be a growth in emerging technologies which will be good for consumers, such as plug and charge.

However, we support the government's proposal on minimum payment outcomes to make the payment process and cost-per-charge easy to understand, and to make it easy to understand and compare payment methods.

We agree that minimum payment methods should not require mobile or fixed internet connections and should work at the location of the individual chargepoint. This should also work underground and where there is no mobile signal. We also agree that operators may use their own impromptu solution as long as they also offer an alternative improvised option.

We know from our analysis of Tweets about public charging, that in many cases problems with a payment app can prevent people from using a particular chargepoint.

Minimum payment methods should exclude those that require a downloadable app, proprietary software or proprietary card before or after the transaction takes place. Our preference would be for a form of contactless payment, rather than a call or text-based solution. Call or text-based solutions would be a problem for a consumer without phone battery. More importantly, this would be unsuitable for chargepoints in rural areas.

We agree that the impromptu solution should be available to all consumers, regardless of how long they are charging for, or how frequently they use a particular chargepoint or network. To ensure the uptake of EVs, consumers should have the same flexibility and access as they currently experience when filling up an ICE vehicle.

Q2: If implemented, do you think these requirements should apply to all chargepoints? If not, which chargepoints should be covered and why?

Yes we agree that these requirements should apply to all chargepoints. We would expect the majority of chargepoints to be covered by a roaming solution, as discussed in more detail below.

Problems with smartphone apps are one of the main issues people experience when trying to use an EV chargepoint. It is crucial that people have the option to access chargepoints through other means, otherwise they are unable to use vast areas of essential infrastructure.

The government's proposals provide CPOs with sufficient flexibility on how to provide a minimum payment method, allowing them to choose an option which incurs lower costs. The onus should be on CPOs to make the case for excluding a chargepoint from these requirements, with an agreement to review any exemption within an agreed timeframe, to ensure it is still appropriate.

Q3: What alternative solutions to contactless would provide consumers with a comparable quick and simple payment mechanism (provide evidence on costs)?

As identified in the consultation, a number of new technologies and business models are emerging to allow consumers to pay to charge. One example is plug and charge, which would allow consumers to plug their car into a chargepoint and charge without the need for an RFID card, app or credit/debit card.

It is important to recognise that new methods of payment are likely to develop, and that this is likely to benefit consumers. However, minimum payment methods should continue to ensure that the public chargepoint infrastructure is accessible to everybody.

Q4: Do you agree we should intervene now to implement roaming? If not why?

Yes, the government should intervene now to implement roaming.

Evidence from other countries is clear that roaming solutions improve the consumer experience, and are well received by consumers.

Q5: Which option do you think is the most suitable approach for delivering roaming in the UK? Please rank the options in order of preference.

Order of preference:

1. **Option 4 - requiring CPOs to open their networks to any third-party emobility service provider (eMSP) or each other without any discrimination.**
2. **Option 3 - Government establishes an interoperable roaming platform.**
3. **Option 2 - Require all public chargepoints to be accessible via a QR code provided on, or close to, the chargepoint that then directs consumers to a payment platform.**
4. **Option 1 - Market-led approach - the government continues to work with industry to establish an industry-led solution, but does not regulate at this stage.**

Q6: Please provide reasons for your answers, including supporting evidence or analysis, and suggest any alternative approaches to achieving roaming. Please state any challenges you foresee and what you would need to address them.

Citizens Advice recommends government adopt option 4 - 'requiring CPOs to open their networks to any third-party eMSP or each other without any discrimination'.

Whichever option the government chooses, the priority should be to focus on developing a roaming solution which covers as many chargepoints as possible, can be implemented as quickly as possible, and at the lowest cost to consumers. Based on our understanding of the various options, it is our view that option 4 would be the most suitable option. We consider each option below.

Option 1 - 4th preference

In some areas, the market has improved in recent months with new commercial agreements enabling roaming between different chargepoint operators. Examples include Octopus Energy's Octopus Electric Juice service[4] , Zap Map's Zap Pay[5]. There have also been some individual agreements signed like the one between New Motion

[4] Octopus Electric Juice, 2021
[5] Zap Pay, 2021

and Char.gy.[6] More generally, EV Roam was also established to support the communication between different chargepoint operators.[7]

These industry led solutions are a good first step in establishing how roaming may be enabled, however it is some way off the scale of roaming required. Using market shares as of July 2020, a significant proportion of companies in the energy market have not yet signed any roaming agreement and individual roaming platforms only provide consumers access with the chargepoint operators signed up to those platforms.[8] This indicates that there is a significant amount of work needed in this area to enable roaming services, fully.

While there is some evidence of an early movement towards roaming solutions in the market, we are concerned that this will not be developed quickly without government intervention.

Option 2 - 3rd preference

It is our understanding that this option would be relatively quick and low-cost to implement. However, whilst it sounds like a relatively simple solution, Citizens Advice is concerned that it would only be available to consumers with a smartphone. We do not see this as true roaming, as each QR code could take a consumer through to a new payment platform. Overall this solution does not seem like it would produce an optimal consumer experience, nor would it be accessible by all.

Option 3 - 2nd preference

The advantage of this approach is that it would allow drivers to access payment at all chargepoints with the same RFID card or app. It has the potential to deliver a smooth consumer experience. The roaming hub model already exists in other European countries, such as France and Germany.

However, we agree with the assessment in this consultation document that this solution would be both complex and costly, with the potential for delays in implementation and spiralling costs for consumers.

This model closely resembles that of the Data Communications Company (DCC). In the past we have raised concerns about the increasing costs and service delays associated with the DCC. Given that the purpose of establishing a roaming solution is to drive EV uptake in the short term, this is unlikely to be a feasible solution.

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[6] New Motion signs roaming agreement with Char.gy, 2020
[7] EV roam, 2020
[8] Zap-insights - UK network market share, 2020

If this option was chosen, there should be a clear roadmap for how costs will be kept down and how this would be achieved quickly.

Option 4 - First preference

Based on the criteria outlined above, it is our view that Option 4 is the most suitable option for roaming in Great Britain. A variant of the peer-to-peer model is already used in several European countries, including in the Netherlands. As discussed in relation to option 1, peer-to-peer roaming solutions have already begun to develop across the UK. EV Roam has also been established to support the communication between different chargepoint operators. However, when compared to option 1, requiring CPOs to open their networks to any eMSP or CPO should ensure that roaming develops at greater speed. It will also allow multiple business models to emerge.

Although we are in principle in favour of this particular model, the detail of this peer-to-peer solution will determine the consumer experience. It is crucial the government nominates an appropriate organisation to deliver it, and it's crucial that there are clear auditing procedures to monitor delivery, with consequences for non-compliance.

Q7: Do you agree with our suggested criteria when requiring chargepoint operators to allow access to their network?

We agree that CPOs should be required to publish and maintain a roaming tariff: it should reflect both the minimum ad hoc price that a CPO will accept for a third-party eMSP to pay per kWh. We agree that the government should nominate an organisation to maintain a public list of roaming tariffs. While this transparency may be sufficient to ensure that costs remain reasonable, the government should monitor this, to ensure that CPOs are not setting their prices at a level that stifles competition.

We agree that eMSPs that wish to gain access to CPOs through this regulation should also meet a standard criteria should be published and updated annually by the government or another organisation.

We expect the government will consult with us as this minimum criteria is developed. The complaints we have analysed shows that poor quality apps can cause significant problems for EV users. Faulty apps can make it difficult to locate working chargepoints, or begin a charge once a chargepoint has been located. A minimum level of service reliability must be part of any minimum criteria.

Developing and enforcing a minimum criteria should require CPOs to work with eMSPs and this ought to create significant incentives for eMSPs to comply with the criteria too. However, the government should also build in opportunities to monitor the activities of any eMSPs operating outside of this criteria, and intervene if necessary.

Section 2: Provision of data on public electric vehicle chargepoints

Q8: Are there any 'must-have' data types that should not be made available? If not, state which data sets and why, providing evidence.

We agree that all of the must-have data types should be made available.

Q9: Do you think that the 'should have' and 'could have' data types should not be mandated to be available now?

Government has set out the key 'must have' data types in this consultation. However, we would expect that booking information may become increasingly necessary for consumers, depending on how the market develops, and would expect the government to keep an eye on this.

The inclusion of ' ancillary services' as a 'should have' data type is too broad, and we would welcome further clarity from the government about what this includes.

Q10: What, in your view, should be included in the disabled access information?

A 2020 study from Motability found that disabled users are currently unable to find accessibility information about chargepoints.[9] They recommend that crowdsourcing information could allow disabled users to log their experiences and share these with others.

One option would be for disabled users to verify whether individual chargepoints are accessible to people with their specific disability, coupled with a feature which would allow other users to filter for those chargepoints in their smartphone app.[10] While this

[9]Motability, Electric Vehicle charging infrastructure for people living with disabilities, 2020
[10]Motability, Electric Vehicle charging infrastructure for people living with disabilities, 2020

would require more active support from app developers, one provider has already indicated to Motability that they are open to providing this.[11]

One option that the government could consider would be to require CPOs and eMSPs to ensure that their apps allow disabled users to crowdsource and share this information.

Q11: Do you think that Open Charge Point Interface should be adopted as the standard for the provision of public chargepoint data across the chargepoint operator's systems?

Citizens Advice agrees that the Open Charge Point Interface (OCPI) should be adopted as the standard for the provision of public chargepoint data across the CPOs system. Open standards are collaborative and flexible to change, which is essential for this market. OCPI is used extensively throughout Europe, and also in the USA.

Developing a new standard for the UK will be costly, while the OCPI is already used by some CPOs. We agree that the standard should be kept under review, to ensure it remains relevant to new and evolving standards.

Q12: Do you think that adoption of a standard will present challenges? If so, what challenges?

We haven't identified any particular challenges at this stage, but agree that flexibility to adapt to new standards may be needed in the future.

Q13: Do you think that the preferred hybrid data architecture achieves the overall policy aim to make data available to support electric vehicle drivers?

Yes we are supportive of this approach, and see this as the simplest solution for consumers.

Q14: What opportunities or challenges will this present for your organisation?

We don't anticipate any problems with this approach for Citizens Advice. However, it is important that the right assurances are in place so that consumers

[11] Motability, Electric Vehicle charging infrastructure for people living with disabilities, 2020

feel confident that they are clear and in control about what data they are sharing.

Q15: Are there any future technology, policy, or regulatory changes you are aware of that might impact the preferred data architecture?

Close attention should be paid to the work of the Electric Vehicle Energy Taskforce (EVET). Government should ensure that this work aligns with recommendations that develop from the second phase of EVET, in particular proposal 12: 'Making public chargepoints easily accessible for EV drivers'. Other relevant policy development that could impact the preferred data architecture include:

- Ofgem's work on Data Best Practice.[12]
- Ofgem's Digitalisation Strategy and Action Plan (DSAP)[13]
- BEIS' Energy Data Visibility Project[14]

Q16: What does government need to do to further minimise costs for industry? Please provide reasons for your answers, including supporting evidence or analysis, and suggest any alternative approaches.

No answer.

Q17: Do you think the government should use the data architecture that emerges from the Modern Energy Data Access (MEDA) competition as a vehicle for open electric vehicle data?

The recommendations developed by the Energy Data Taskforce include good principles for ensuring that data is more visible and accessible across the energy system. We support in principle a close collaboration with MEDA, but suggest waiting to see what emerges from the competition before committing to using this data architecture.

While we support the goal to make data more visible and accessible across the system, consumers should also have visibility and control over which of their data they share. A

[12]Ofgem, An early draft of Data Best Practice, 2019
[13]Ofgem, Digitalisation Strategy and Action Plan guidance workshops, 2020
[14]Ofgem, Outcomes from the ONS Energy Data Visibility Project discovery phase, 2021

data dashboard could increase consumer confidence when engaging with services derived from their data, and would also increase accountability for companies offering such services.[15] Data should also be accessible and portable for consumers, so that they can benefit from the value that it creates.

Q18: Are there any related data platforms which the Open Public Chargepoint Data should be linked to? If so, please specify.

No answer.

Section 3: Pricing transparency

Q19: Do you think the government should mandate a p/kWh metric? If not, why?

Yes, the government should mandate a p/kwh metric.

Q20: Do you think the government should allow chargepoint operators to have the flexibility to determine how the cost of charging, the energy consumed, and the total cost of a charging event is made available to a consumer?

We support the proposal for some flexibility about how CPOs make this information available to consumers. However it should be underpinned by the principle of making information accessible and easy to understand for consumers.

Clear pricing information, including a p/kwh metric, should be available to consumers on the chargepoint itself and not just via a smartphone. Care should be taken to ensure that this information is accessible to disabled users, and principles for this should be drawn up with relevant stakeholders. Government and industry should also consider how they can also incorporate any learning from the work to develop accessible In Home Displays for smart meters[16].

[15]Citizens Advice, The Smart Meter Data Dashboard, 2018
[16] RNIB, Accessible smart meters are now available from selected suppliers, 2019

Q21: Do you think the government should allow the exemptions to the p/kWh proposal and are there others we should consider?

The proposed exemptions seem reasonable. However, the government should be cautious about the possible unintended consequences this might have, particularly if it incentivises companies to behave in ways that have a negative impact on consumers. For example, while overstay charges are necessary to prevent drivers from blocking a parking space after their charging has ended, there is potential for this to be misused and result in complicated charging costs. The government should monitor how exemptions are used and intervene if necessary.

Q23: Do you think that all chargepoints should have a Measuring Instruments Regulations compliant meters?

Citizens Advice supports the proposal for all chargepoints to have a Measuring Instruments Regulations compliant meter. Any decision to limit this to newly installed or renewed chargepoints should be based on clear evidence about cost, and demonstrable plans to mitigate the negative impact it will have on consumers.

Section 4: Reliability

Q24: Do you think that a reliability standard should be set

Yes, we agree that a reliability standard should be set.

In more than half (58%) of the tweets we looked at, people had experienced a problem while using a public chargepoint. Establishing a reliability standard would help address this, and we're pleased that the government is proposing to do this.

Q25: Do you think that the 99% availability standard should be set on a fleet average basis?

We agree that a 99% availability standard is a good ambition for a fleet average basis. This is already expected by chargepoint operators in the Netherlands. As noted in the consultation document, chargepoint reliability has improved in recent years, which is likely driven by the anticipation of the introduction of an availability standard.

Given that there are a number of actors involved in ensuring the reliability of public chargepoints (CPOs, local authorities, manufacturers), care should be taken that responsibility is clearly delineated.

If the decision is taken to adopt a lower availability standard, this should be based on clear evidence about why a 99% standard is not achievable or how it would have adverse consequences for consumers.

Q26: Do you have any other suggestions to achieve a more reliable network?

Any reliability standard should be underpinned by an effective monitoring and enforcement regime. This should balance effective monitoring and enforcement, with assurances that significant costs won't be incurred by consumers.

Many of the problems consumers experience with public chargepoints are related to using an app. We expect some of these issues to be resolved by improved data availability and minimum payment methods covered in the rest of the consultation. However, in some cases the reliability of an app itself can be a problem for consumers. We recommend that the government explores measures to ensure the reliability of apps going forward.

Q27: 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?

A one-year lead time seems reasonable for the regulations to come into force. As discussed, many CPOs have already begun to make improvements to reliability in anticipation of regulations being introduced.

Given the anticipated increase in the uptake of EV's, it's crucial that improvements to chargepoint availability are made quickly.

Q28: If the reliability metric across fleets was enforced, we propose that there should be exemptions from the availability target that are out of the operator's control. What types of failures should be exempt?

The proposed approach allows for a period of downtime for chargepoint operators. Therefore, it is our view that any list of exemptions for failures should be as narrow as possible. Possible exemptions could include network related power outages.

Q29: Do you think the government should mandate that chargepoint operators provide 24/7 call centres? Should we mandate this be low-cost or free-to-call?

Yes the government should mandate that chargepoint operators provide 24/7 call centres. Many chargepoint operators already provide this service, demonstrating that it is feasible and that there is a demand.

Our analysis of social media complaints shows that in cases where consumers experience problems with a chargepoint or app, call centres can be an essential resource. We also know that where consumers are unable to access call centres that this can cause huge problems, particularly where consumers are stranded.

24/7 call centres should be free-to-call as they are an essential lifeline for ev users stranded when they are unable to use chargers. An analogous example would be the freephone which consumers use to contact their network provider when they are off supply. Many existing 24/7 call centres offered by CPOs are free-to-call.

Q30: 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).

No answer.

Q31: Do you think there are other impacts that have not been identified? If yes, what other impacts are there that you think have not been included (provide supporting evidence)?

No answer.

Q32: Are there any groups you expect would be uniquely impacted by these proposals, for example small businesses or people from protected categories? If yes, which groups do you expect would be uniquely impacted by each of these proposals? Provide supporting evidence.

As discussed in more detail in the following questions, we support the government's decision to consider legislation to make public chargepoints more accessible for disabled users.

Section 5: Accessibility

Q33: Do you have concerns about consumer protection related to the use of public chargepoints that haven't been discussed in this consultation? Please provide reasons, analysis or evidence on what other consumer protection issues should be considered by government in the future.

In 31% of the cases we analysed on Twitter, people experienced problems with their smartphone app when finding or using a public chargepoint.

Some of these issues will be resolved by improved data availability and minimum payment methods covered in the rest of the consultation. However, in some cases the reliability of the app itself can be a problem for consumers. We would recommend that the government explores measures to ensure the reliability of apps going forward.

Q34: Do you agree with the accessibility issues raised?

We agree with the accessibility issues raised in the consultation document.

The research cited by the Research Institute for Disabled Consumers, which shows that 73% of people with disabilities who were surveyed perceived them as neither accessible nor easy to use[17], highlights the barriers that many disabled users encounter when using the public charging infrastructure.

We are pleased that the government sees the increased uptake of EVs as an opportunity to ensure that the UK has an accessible and user-friendly chargepoint network, and that this improves on ICE refuelling infrastructure accessibility.

Q35: Are there any accessibility issues we should regulate on?

Yes. Please see answer to previous question.

Citizens Advice commends this approach and supports the government's intention to continue to work collaboratively with organisations, such as Motability and the Research Institute for Disabled Consumers, as it makes decisions that are impacted by accessibility issues.

Q36: Should there be standards that are enforced/brought in across chargepoints (such as payment height and instructions)? If so, what standards?

Yes the government should consider standards that are enforced/ brought in across chargepoints. This is essential to ensure that the consumer journey for people using these chargepoints is consistent. Any decisions should be made in collaboration and consultation with relevant organisations, such as Motability and the Research Institute for Disabled Consumers, alongside disabled users themselves.

[17] Research Institute for Disabled Consumers, Going Electric?, 2020

Q37: Do chargepoint operators need to provide supervised stations to help assist those with accessibility needs?

The government should work with relevant organisations, such as Motability and the Research Institute for Disabled Consumers, alongside disabled users themselves.

Q38: Does the lack of weatherproofing and lighting at most chargepoints require improvement? If so, what would this look like in your view?

The evidence from our analysis of complaints on twitter support the suggestion that weatherproofing and lighting at chargepoints require improvement.

We identified several cases where consumers complained about issues with weatherproofing at public chargepoints. In each case consumers complained about having to use a chargepoint in the rain, an issue which was frequently compounded by difficulties connecting to the chargepoint.

We have also come across evidence of consumers complaining about having to use chargepoints that are poorly lit and isolated, particularly at night. EV users, particularly women, have raised concerns about safety when using these chargepoints.

At this stage we don't have specific recommendations to address issues of safety in relation to public chargepoints. However, we are pleased to see you seeking evidence on these issues, and encourage you to continue to do so. It is important that any proposals are developed in collaboration with people who have relevant lived experience, and the groups that represent them.

Q39: Should any improvement apply to all chargepoints or those in specific locations? If specific locations, can you identify which?

Improvements to weatherproofing should be considered for all public chargepoints.

In relation to lighting and public safety, we encourage you to continue to seek evidence. It is important that any proposals are developed in collaboration with people who have relevant lived experience, and the groups that represent them.

Q40: Is signage to chargepoints an area that requires improvement? If so, what would this action look like in your view?

Our analysis of Twitter using Method52 identified several cases where consumers complained about poor signage while trying to locate a public chargepoint. These cases were less frequent than those where consumers had difficulty locating chargepoints using a smartphone app.

Consumers most frequently complained about a lack of proper signage close to the chargepoint, in a car park for example. They also complained about signage on chargepoints which didn't correspond to information on a chargepoint app, making it difficult for the consumer to confirm the charge.

We recommend that the government continues to track consumer experience relating to poor signage, and intervene if necessary.

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We provide free, confidential and independent advice to help people overcome their problems. We are a voice for our clients and consumers on the issues that matter to them.

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