

## **The consumer experience at public electric vehicle chargepoints**

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British Vehicle Rental and Leasing Association (BVRLA) members represent the demand-side of the automotive industry, buying around 50% of new vehicles, including over 80% of those manufactured and sold in the UK. In doing so, they support almost 500,000 jobs, add £7.6bn in tax revenues and contribute £49bn to the UK economy each year.

BVRLA members are committed to supporting decarbonisation and have a critical role to play in accelerating the uptake of zero emission transport. Many rental or leasing customers, as well as commercial fleet operators, will not have access to home charging facilities. There will be a significant reliance on public charging and the ability for our members and their customers to charge their vehicles with ease is critical. We therefore welcome the opportunity to respond to this consultation.

We received a range of views from BVRLA members which reflect the fact that this is an emerging area and standard practice is evolving. This response therefore features a range of comments rather than a consolidated BVRLA position.

### **Payments**

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BVRLA members agree that there should be different options for payment and that downloading an app should not be a pre-requisite to access. Where membership schemes/apps do exist, this should be done in addition to the ability to make contactless payment via debit/credit card or mobile and could potentially offer a discounted scheme or special offers for those who have signed up to the scheme.

The ability to pay without requiring a mobile or fixed internet connection is crucial. This would cater for chargepoint locations where there is little, or no, mobile reception or in instances where customers have had issues with connecting to an app.

In some instances, BVRLA members cover the fuel costs as part of the rental. While the ability to make a contactless payment is supported, there is also a need for chargepoint operators to provide a mechanism for organisations to pay a monthly invoice for all re-charging events carried out by customers.

One member raised concern about operators taking large credit card deposits which may not be returned to the customer until several weeks later. They felt that taking large deposits should be prohibited and that issues with card validation could be resolved via finalising the costs at the end of the session rather than taking a large deposit upfront.

Members agreed that the requirements should apply to all public chargepoints. However, there was also a view that it should not apply to private networks, for example the network that Tesla offers which works without a need to take card payment and is popular with customers.

On the question about alternatives to contactless, several members fed back that 'Plug and Charge' would be an ideal solution. This is where payment is linked to a vehicle ID or certification in accordance with ISO15118. This would create a significant step change in the consumer experience by removing the need for customers to have multiple accounts, subscriptions and/or RFID cards. However, some members did acknowledge that this could be an expensive solution and may only suit certain chargepoints i.e. rapid chargers.

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## Roaming

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While BVRLA members agree that government intervention is needed now to implement roaming, there was a diversity of views on which of the options would be best. There was a view that if contactless payment options were widely available then the ability for consumers to 'roam' is not so crucial, however, it was recognised as more useful for fleet operators as a way to replicate fuel cards.

One member felt that a recharge card similar to a fuel card could be useful in the short-term but did not recommend this as a longer-term solution. This was largely due to concerns about increased risks of fraudulent use but also where fuel cards are stolen from the vehicle or taken by mistake. This has the knock-on effect of a poor experience for the next user and has an additional cost to the business who has to replace and re-allocate the cards.

There was some concern that leaving the industry to sort things out for itself could lead to systems that may not be in the best interest of the customer. Some members also cited that this approach has been unsuccessful so far. Others felt that a market approach could work well but that government intervention to ensure fairness and commonality between systems would be essential. Many agreed that there is a role for government in producing guidance and best practice and that government intervention should be light at this stage to enable the market to develop and not to stifle innovation.

Some members could see the benefits of interoperable roaming but also recognised the costs involved and questioned how long this would take for the Government to implement. Others questioned this approach and why this would be necessary if the ability to pay via various methods was widely used.

Generally, members were not in favour of using QR codes with some giving examples of an unexpected payment authorisation fee and others questioning security of such a scheme if these could be easily copied for fraudulent use.

One member warned that developing a roaming solution should not be at the expense of other options being made available i.e. the ability to make contactless payment.

## Data

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Members agreed that a data standard is required so that a customer has all the information needed. They felt that all the 'must have' data types were important and agreed that there was no need to mandate the 'should have' and 'could have' data sets to be available now.

In relation to the question about disabled access information, other 'must have' data would include information on the height of kerbs, height of the chargepoint, space between bollards and in the charging bay in order to get a wheelchair through safely, the weight of cables.

The BVRLA is aware of the work Motability is doing with OZEV and fully endorses UK standards for accessible charging. It would echo the recommendation made by Motability that the development of a standard in respect of information services, whether OCPI (Open Charge Point Interface) or otherwise, should take disabled information into account and that chargepoint operators should seek support from organisations like Motability to gain an understanding of what accessibility means and how to provide the information in an accessible format.

BVRLA members were in favour of the OCPI but did not feel it was within their area of expertise to answer questions relating to the challenges with this approach. Members did comment on the importance of an open data standard being independently managed and provided for free.

They could see the value of the preferred hybrid data architecture. One member commented that this would enable fleet operators to access real time charging data which will enable more efficient charging and deliver more accurate actual cost motoring for the fleet operator and the employee.

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## Pricing Transparency

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This is a critical issue that needs to be addressed. Often there is little or no price transparency until arriving at a chargepoint, so it is difficult to make an informed decision as to which chargepoint offers best value when planning a journey.

BVRLA members would like to see chargepoint operators display their prices like a petrol forecourt so that pricing information is prominent and clear. They have reported several instances where people are unaware of how much they will be charged and what the price per kw/h is.

Most agreed that there is a need for government to mandate a p/kwh metric to ensure consistency and that there should be no exemptions. There were mixed views on whether chargepoint operators should have flexibility to determine the cost of charging. However, members could see the benefits of government ensuring that there is a common approach by chargepoint operators when determining the cost of charging by setting minimum standards. One way this could be achieved is by using the same approach as energy providers use for billing consumers where the costs and energy consumed are displayed in a specific way.

Some members felt there is a need for a controlling body to intervene where pricing is not clear. Others wanted to ensure costs such as overstay and parking are very clearly communicated.

In relation to the questions about Measuring Instrument Regulations-compliant meters, members who responded to these questions agreed that these should be mandated for new chargepoints to ensure customers are treated fairly. In relation to whether this should apply to all chargepoints, one member responded that this should only apply where there is an associated cost to the consumer and saw it as unnecessary for chargepoints at retail/hospitality locations.

## Reliability

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Members welcome the proposals for the Government to set a reliability standard. While some members agreed with the 99% availability standard, others have raised concern about this approach. Those who raised concern were worried that certain chargepoints may face persistent neglect and a high degree of downtime. This could become a common complaint where chargepoints are older and perhaps not used so much. This was also flagged as an issue for fleet drivers who will have a schedule of work to complete and who will plan when and where to charge based on a pre-determined route.

Regardless of age or usage this could have a significant impact if that chargepoint is in a more rural location or if it is used by people with no suitable alternative nearby i.e. commercial vehicles or disabled users. An alternative approach could be to set a standard against each chargepoint or to set a percentage available at a location rather than across the supplier's network.

One member commented that most issues relating to reliability were due to chargepoints losing a connection to a base or losing connection to the payment process. They felt that forcing operators to hard-wire devices may resolve issues of reliability.

Most members were in agreement with the proposal for a one-year lead time for operators to achieve reliability compliance once the regulations come into force. Some felt there should be a shorter lead time for new chargepoints. Another member questioned whether this gave an unfair advantage to larger operators with greater financial backing and questioned if support would be available to smaller local/regional operators with older equipment.

Members agreed that there should be exemptions for circumstances out of the control of the operator i.e. power outages. Some members also felt vandalism could be considered but there would need to be stringent checks in place to ensure this wasn't used as a way to manipulate the reliability.

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There was agreement that there should be a free 24/7 helpline but different views on which chargepoints this should apply to. A free helpline would give necessary assurances about safety and security especially where chargepoints may be more rural or isolated and would certainly provide greater consumer confidence to disabled drivers who will require more support or advice to charge.

## Emerging areas and consumer protection

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### Weatherproofing & lighting

While members felt that rainproofing was a nice to have, not all saw this as essential. Many members did feel that adequate lighting should be a requirement, especially to provide greater feelings of security and to ensure instructions and pricing can be clearly viewed.

### Accessibility

Several members have raised concerns about the accessibility of chargepoints, particularly for commercial vehicles which are often larger than the spaces provided. There are also often issues with commercial vehicles due to where the charger is located on the vehicle and cables not being long enough to reach.

Thinking about disabled users is also crucial. Motability has conducted research with Ricardo which estimated that up to 50% of the 2.7 million disabled drivers in the UK will be reliant on public charging infrastructure. The lack of supply to accessible charging infrastructure, whether on the street, at the office, or at home, means the future demand of disabled consumers and possibly other consumer groups as well will not be met.

We welcome the work Motability is conducting with OZEV on accessible charging standards and support its recommendation that reference to the standards should be given in any future regulations to encourage adoption and to introduce an audit of chargepoints relative to the standards at regular intervals.

### Signage

There are a number of ways in which signage should be improved whether this is to clearly signpost the chargepoint(s) or to ensure pricing information is clear.

Finding chargepoints at locations can be exceptionally difficult and warrants clearer road markings/signage to help people locate them.

Signage is also crucial where chargepoints are down and people need to find the next nearest available chargepoint. There could also be improvements to signage to warn non EV drivers of the consequences of using parking in EV charging bays.

Where chargepoints are located at motorway service stations there should be illuminated tariffs which clearly display pricing, availability, and even accessibility information.

Some members felt that there should be more public signage by local councils.

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## About the BVRLA

The BVRLA represents over 970 companies engaged in vehicle rental, leasing and fleet management. Our membership is responsible for a combined fleet of four million cars, vans and trucks – one-in-ten of all vehicles on UK roads.

BVRLA members represent the demand-side of the automotive industry, buying around 50% of new vehicles, including over 80% of those manufactured and sold in the UK. In doing so, they support almost 500,000 jobs, add £7.6bn in tax revenues and contribute £49bn to the UK economy each year.

Together with our members, the association works with policymakers, public sector agencies, regulators, and other key stakeholders to ensure that road transport delivers environmental, social and economic benefits to everyone. BVRLA members are leading the charge to decarbonise road transport and are set to register 400,000 new battery electric cars and vans per year by 2025.

BVRLA membership provides customers with the reassurance that the company they are dealing with adheres to the highest standards of professionalism and fairness.

The association achieves this by reinforcing industry standards and regulatory compliance via its mandatory Codes of Conduct, inspection regime, government-approved Alternative Dispute Resolution service and an extensive range of learning and development programmes.

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