

Electro-mobility Platform recommendations on the EPBD review Guidance Note

In this paper, the Platform for Electro-mobility presents its recommendations to the European Commission for its Guidance Note on the implementation of the revised Energy Performance of Building Directive (EPBD). This paper aims at detailing the context and the content of the recommendations.

Background: The revised Energy Performance of Buildings Directive was published in the Official Journal of the European Union on June 19th, 2018 as of which Member States have 20 months to implement the revised text in their national legislation, i.e. before 19 February 2020. The European Commission will publish a guidance note by the end of the year to help and advise Member States in the implementation phase.

The Platform would like to stress that the deployment of private smart charging infrastructure remains a core pre-condition to bolstering electric vehicle (EV) market acceptance.

The market of EVs is expected to increase significantly in the coming years. A Bloomberg study¹ foresees that the total cost of ownership (TCO), meaning the costs of acquisition and use of an electric vehicle, **falls significantly below that of conventional vehicles, even when considering the price of a home charging point. By 2022, the TCO of electric vehicles in the small and medium vehicle segment will be equivalent to the TCO of Internal Combustion Engine vehicles in the EU².** Subsequently, the penetration of EVs is foreseen to grow to 4% of new car sales in 2020 and reach 63% of the new car sales in 2040³. **Adequate recharging infrastructure both in public and private spaces is therefore crucial to meet charging needs and foster the European EV market uptake.** Public infrastructure requirements along roads are provided in the Alternative Fuels Infrastructure Directive (AFID), as well as the subsequent Commission action plan, whereas the EPBD review aims to complement these by addressing the question of recharging infrastructure in non-residential and residential buildings by setting out some basic requirements for the roll out of EV charging points or mere ducting infrastructure.

In this regard, the Platform **regrets the lack of ambition in the EPBD review and calls on the European Commission to include in its Guidance Note three main recommendations necessary to remove barriers to the development of electro-mobility.**

1. Encourage Member States to go beyond the minimum provisions outlined in the EPBD review to deploy smart charging infrastructure at minimum costs

With 90% of the charging taking place in the private spaces and buildings – overnight at home or daily at the workplace, the pre-equipment of buildings for the installation of smart EV charge points is of utmost importance. The revised EPBD requires car parks of new or heavily renovated non-residential buildings to be equipped with at least one recharging point and that at least 20% of their parking spaces are equipped with ducting. In new and substantially renovated *residential* buildings, on the other hand, the revised EPBD requires that all parking spaces are equipped with ducting infrastructure. These provisions only apply under the conditions that the building has more than ten parking spaces, the parking lot is inside or adjacent to the building **and** the renovation measures are limited to the parking lot or the electric infrastructure of the

¹ BNEF, "Long term electric vehicle outlook 2017"

³ BNEF, "Long term electric vehicle outlook 2018", 2017

building. For existing buildings with more than 20 parking spaces, the minimum requirements of pre-equipment and charging infrastructure are to be decided by each Member State, and only to be applied by 1 January 2025.

The Platform regrets that the scope of the provisions regarding non-residential buildings has been significantly lowered down compared to the European Commission initial proposal⁴. Indeed, the number of recharging points to be installed in this type of buildings after 2025 is also drastically decreased⁵, without compensating it by more ducting of parking spaces. The Platform also deplores that the deletion of the reference to Smart Charging.

Finally, the addition of unnecessary exemptions, such as the possibility for Member States to not apply the requirements of Article 8 to small and medium-sized enterprises⁶, in addition to those regarding the number of parking spaces, thus acts to considerably undermine the impact and aim of the directive.

Recommendation:

The Platform for Electro-Mobility supports an **extension of the ducting infrastructure requirements to all parking spaces regardless of whether these are in residential or non-residential buildings**. Ducting infrastructure is a **future-proof and cost-effective solution**, the installation cost of which is minimal as compared to the total cost of constructing or renovating a building. By comparison, **failure to ensure ducting infrastructure would entail costs up to nine times higher if a building is to be retrofitted at a later stage**. The Platform notes that Member States were ready to implement stronger requirements of ducting infrastructure in non-residential building⁷, and calls on the European Commission to encourage Member States to go beyond the minimal provisions set out in the final text of the directive. **The Platform supports the deployment of Smart Charging⁸** to enable a more efficient integration of electro mobility in the power system.

2. Promote a “right-to-plug” in all Member States

The Platform for Electro-Mobility welcomes the obligations to facilitate the deployment of recharging points in new and existing buildings (article 8(7)). Today, long and uncertain approval procedures act as a major barrier for owners and tenants to deploy smart charging points in shared residential and commercial buildings. If these hurdles are not removed, putting in place ducting infrastructure cannot have its full positive impact. Any **tenant or co-owner should be enabled to install a recharging point for an electric vehicle**. Several Member States, including France, Portugal and Spain, have already realised this necessity and implemented such rules.

However, even in some of these countries where “right to the plug” measures exist, non-financial barriers may hinder the deployment of recharging infrastructure. For instance, in France, in the context of co-ownerships, current standard regulations are not adapted to an easy implementation of charging solutions

⁴ The EC proposal supported the installation of one recharging point for buildings that have more than ten parking spaces as soon as those buildings undergoing major renovations, whatever the type of renovation concerned.

⁵ The revised Directive only refers to non-residential buildings with more than twenty parking lots while the EC proposal considers all non-residential buildings.

⁶ Small and medium-enterprises as defined in Title I of the Annex to the Commission Recommendation 2003/361/EC of 6 May 2003 represent 99.8% of the European industrial fabric. http://ec.europa.eu/eurostat/statistics-explained/index.php/Statistics_on_small_and_medium-sized_enterprises

⁷ The Council REV 2 proposal (11 April 2017) provides for the pre-tubing of every parking space while the final version only provides for the pre-equipment of at least one in every five parking spaces

⁸ Please refer to the position paper of the Platform “[tapping the value of smart charging](#)”

and **some barriers still exist**⁹. In contrast, Spain has adopted in its national regulations simple rules to remove such barriers in particular for multi-owner buildings where the *installation of an EV charging point for private use in an individual garage space only requires prior communication to the community*¹⁰.

Recommendation:

The Platform calls on the European Commission to **guarantee that owners of parking spaces in residential buildings are allowed to install, at their own expenses, a smart charging point for electric vehicles without any further approval or procedure, other than the prior communication to the building co-owners.**

Besides, to ensure an effective installation of smart charging stations in all types of buildings (e.g. commercial, railway stations or bus depot), **permitting and approval procedures should be simplified, and instruction time of connection request reduced.**

3. Ensure interoperability of infrastructure to facilitate the quick development of the EV market

On top of the deployment of smart charging points, which is a necessary condition to the uptake of electromobility, **the legislation must ensure that the recharging infrastructure is not built as closed ecosystem.** Closed ecosystems are characterised by important switching costs – defined as the real or perceived costs incurred when changing supplier – that are not incurred by remaining with the current supplier¹¹. Switching costs can take various forms and stem from several causes (e.g. product price, absence of data portability or contractual costs, such as long-term contract between the user and the recharging system).

EV users can benefit from the deployment of a smart charging infrastructure network only if they may access all charging points without facing switching costs. To do so, the legislation shall ensure interoperability for all actors of the EV ecosystem.

At the same time, it is also important for the EU to promote pricing interoperability (“e-roaming”), by ensuring payment for charging is straight forward, reliable, and accessible for all users. The user perspective is essential in this regard, real time data, easy billing, price transparency, and accessibility are the most important aspects that need to be provided to consumers.

As such, **interoperability guarantees the optimal use of smart charging infrastructure and may increase the level of innovation in the electro-mobility industry and plays a major role in increasing EV adoption rates while eliminating range anxiety.**

In addition, smart charging for EVs should be also interoperable with other intelligent devices in buildings to ensure a proper development of smart buildings across Europe.

Recommendation:

The Platform calls on the European Commission to include in its guidance note that **Member States shall ensure interoperability, harmonised standards and open protocols among the infrastructure and systems to enable seamless communication between all actors: consumers, system operators, service providers and aggregators.** In that context, the Platform views the reference to charging connector specifications stipulated in the Directive 2014/94/EU in article 8(2) as a first step to the implementation of a broader interoperability.

⁹ http://www.eclairerlavenir.fr/wp-content/uploads/2018/07/Rapport_GT1.pdf

¹⁰ Commonhold Property Act, <https://www.boe.es/buscar/act.php?id=BOE-A-1960-10906>

¹¹ See Office of Fair Trading (2003), “Switching costs. Part one: Economic models and policy implications” (OFT655) and OFT (2011), “Consumer Behavioural Biases in Competition, A Survey” (OFT1324).