Under Secretary of State
Rachel Maclean MP
Great Minster House
33 Horseferry Road
London
SW1P 4DR
E-Mail: consumerofferconsult@olev.gov.uk
Web site: www.gov.uk/dft

19 June 2020

Improving the consumer experience of using public chargers

Dear Minister Maclean,

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 consultation. This document is not confidential and may be published on your website.

We recognise the government may move swiftly and increase support for electric vehicles through a post covid19 'green' economic recovery, aiming to stimulate the motor industry again. It will be crucial to improve people's confidence in and experience of public charging, for this to happen.

However, it is unfortunate that the window for responses to this consultation is so short. To fully improve the consumer experience, we encourage the government to continue and build on its stakeholder engagement of this issue above and beyond this consultation.

This consultation highlights many of the well known difficulties associated with public charging. Citizens Advice has carried out a qualitative analysis of public social media posts on twitter (tweets) which gives us insight into some of the other problems consumers face when they use public charging infrastructure. These include public bays that are inaccessible for disabled people and a lack of public chargers in some local areas, which is particularly problematic for people without off street parking. We are aware of the work the government is undertaking in both these areas and encourage engagement with stakeholders, including both local government and the private sector to ensure its success.

While we use evidence from a range of sources in this response, the main evidence we have drawn upon is an analysis of tweets involving public charging issues between June 2019 and June 2020. Citizens Advice accessed and analysed these tweets using a natural language processing programme called Method52.[1] This analysis involves

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

searching for key terms relating to public charging infrastructure or public charging issues. We also applied a keyword filter to remove tweets containing irrelevant terms, which includes training and applying a 'relevancy classifier,' that further refines the search. Finally we developed a coding framework, and manually coded the relevant tweets according to the type of public charging issue.

This approach prioritises identifying and removing false positives, and as such we are likely to have excluded a large number of relevant tweets. For example, any public charging issue that does not specifically discuss a provider of public charging infrastructure would not have been accessed. We are also aware that people who use Twitter are a small subsection of the population, and therefore it is essential that caution is exercised when using this evidence. Despite these significant limitations, this approach has allowed us to gain a good understanding of the types of common issues Electric Vehicle (EV) drivers experience, and the barriers those issues pose to progress on EV uptake.

Between June 2019 and 2020 Citizens Advice have identified 297 tweets involving problems consumers experience when using the public charging network, from which we identified 371 separate issues.

Debit/Credit card payment

We agree with the recommendation to require chargepoint operators to provide debit and credit card payment at all new public chargepoints. 19% (71) of the issues we identified on Twitter involved customers who were frustrated over having to pay via an app or RFID card. Common complaints are about the number of apps or cards that were required and issues caused when the app stopped working.

People often complain about apps being unreliable: this might be because they experienced difficulties confirming charges via the app, or found that the car had not charged fully when they returned to it. In 31% of cases consumers pointed to faults with the app or reported difficulties with using an app

Data availability

Negative perceptions of the public charging infrastructure still remain a challenge that both the government and industry must take action to overcome. In 2018, 48% of people believed a lack of charging infrastructure was a barrier to electric vehicle adoption and 46% said an inability to charge locally was a problem[2]. The charging infrastructure is in fact far better than many people assume. Whilst it is not perfect, it's important that chargepoint data (such as price, speed, location and current availability) is made open for companies to innovate and offer consumers services, which helps them identify where chargers are, what they cost and if they are available for use. This helps public confidence and the market develop and was a prime reason Citizens Advice made this recommendation through the government's Electric Vehicle Energy Taskforce.

Citizens Advice's Method52 analysis suggests that incorrect or incomplete

[2] Baringa, 2018, Is the UK ready for electric cars?

chargepoint information can severely disrupt the consumer experience of Electric Vehicles. 24% of the cases we looked at included these kinds of problems. Common issues included: chargepoints that were missing from apps, chargepoints that were broken but were shown on apps as working, or apps that displayed incorrect information about charger speed or cost.

Twitter case study:

The consumer was using an app which showed new chargers in their area, but the chargers didn't yet exist. They asked the companies involved whether the installations were still expected to go ahead.

Citizens Advice supports the government's decision to make static and dynamic data about public chargepoints publicly available. However, it must also ensure the data shared is reliable and high quality. It will be important that the government carries out a privacy assessment to understand the implications of making this data open. People must remain fully aware of how their personal data is being shared, and retain the ability to control it.[3] As shown above, effective use of this data will depend on the functionality and reliability of the app that consumers are offered.

Reliability

Poor reliability and unit communication issues are common issues raised on twitter about public charging points[4].

Our Method52 analysis of Twitter suggests that issues with chargepoint reliability are common. Public perceptions of reliability also remains a significant barrier to preventing progress on EV uptake[5]. 34% of the issues we analysed involved public chargers that were out of action. The majority of these cases involved faulty chargers, or cases where customers were unable to confirm or maintain chargers (including issues related to apps).

A minimum standard of maintenance for EV chargers should be established to improve the situation. It will be essential that local authorities contract and budget for the cost of maintenance when they plan and procure electric vehicle chargers. Through the government's electric vehicle energy taskforce, Citizens Advice also recommended guidance for local authorities. The Energy Savings Trust guidance[6] goes some way toward ensuring local authorities are well equipped to maintain chargepoints they procure, however, additional work may be necessary to understand what barriers local authorities may face in the long term maintenance of public chargepoints.

People also frequently use twitter to complain about EV chargepoints that were blocked, either by internal combustion engine (ICE) vehicles or EVs that had finished charging. In the past, we have raised the matter of parking incentives/disincentives that might be needed. Such action should be taken carefully, considering the

[3] Citizens Advice, Clear and in control, 2019
[4] ZapMap survey, 2018
[5] Baringa, 2018, Is the UK ready for electric cars?
[6] EST, 2019, Procuring Electric Vehicle charging infrastructure as a local authority

balance between a good consumer experience and the alternative. Contacts to our Consumer Service Helpline identify complaints from consumers who have been issued parking fines but believe signage was poorly displayed. Such parking incentives/disincentives are highly dependent on the type of technology used. For example, wireless charging may not require such measures.

People also used social media to complain about chargers that were not compatible with their EV.

Pricing transparency

Our evidence confirms that many EV drivers find comparing EV chargepoint prices confusing. 7% of the issues we identified related to price transparency. As identified in the consultation, a common problem were chargepoints where consumers were charged per hour (as opposed to p/kwh). Consumers also experienced difficulties with understanding pricing, where connection or standing charges were included. In some cases consumers returned to their car after it had charged and discovered that they had been charged much more than they had initially anticipated. People also complained about pricing information on a provider's app that is different to the price they find when they arrive at the chargepoint.

A standardised metric of (p/kwh) could be introduced (like supermarkets have common p/kg information), which would help people interpret different charging price mechanisms without hampering innovative offers. This would need to be displayed clearly, otherwise it will not give consumers the protection they need.

More generally, 68% of EV drivers use the public charging infrastructure at least once a week, according to a survey by Next Green Car[7]. Improving the experience of the public charging infrastructure is key to encouraging take up and supporting people as they make the move to this form of transport.

We are happy to discuss or clarify any of the content in this letter.

Yours sincerely,
Tom Brooke Bullard

[7]Zap Map, Next Green Car, 2018