



## **Response of the Road Haulage Association to the Department for Transport.**

### **“Consultation on proposed ULEV measures for inclusion in the Modern Transport Bill”.**

**22 November 2016**

#### **Background about the RHA**

1. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs and ranging from single-truck firms to those with thousands of vehicles, provide essential services on which UK businesses and the economy depend.
2. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of member services including advice, representation and training.
3. We would like to thank the Department for the consultation and this opportunity to comment on the issues raised.

#### **General Comments**

4. The RHA and its members are active supporters of reducing emissions in the road haulage sector and our effect on climate change as a whole.
5. We strongly believe that this consultation should also take into account the future of the heavy vehicle sector as failing to take this into account at this stage will mean unnecessary additional and increased investment in the future.
6. Some points of initial concern are;
  - a. Impact on the National Grid
  - b. The impact on Climate Change in generating considerably more electricity and hydrogen to meet the needs
  - c. Cost of hydrogen will force Electric use as preferable option
  - d. Charging time at EV Charge points
  - e. Sufficient refuelling/charging on all road networks
  - f. Predicted use is 75% of all vehicles either Hydrogen or Electric by 2035, the network needs to be extensive enough to handle the capacity required (source <http://www.world-nuclear.org/information-library/non-power->

[nuclear-applications/transport/electricity-and-cars.aspx](#)) and have the capability to avoid disruptions to supplies.

## Responses to the Questions

**Question 1. What are the costs and benefits of requiring infrastructure operators to provide open data on geographical locations of publicly accessible charge points and refuelling points? In what standardised format should this most appropriately be provided?**

It is of benefit to users (including goods vehicle operators) to have full knowledge of all charge and refuelling points on a central database accessible to all via IT. This will save time and money having to look at various different operators' websites or search for locations. It is suggested that there be an open web source or App.

**Question 2. Do you agree that live (dynamic) data should also be openly available? What proportion of existing publicly accessible chargepoints and refuelling points have the technical capability to provide information on the live availability of services?**

Yes, we agree that data should be current and also inform about available charge points for EV's (including goods vehicles), we are unaware of current practice.

**Question 3. How could a roaming platform, or bilateral roaming solution between operators be developed to best serve users and operators? Could this be delivered without legislative intervention?**

We believe that unless there is legislative intervention on standard charging then users will opt for operators that have the most competitive price. Motorway Services currently charge between 10 and 15 pence per litre more. All charging points should be available to all users.

**Question 4. What are the costs and benefits of requiring EV infrastructure operators to deliver a roaming platform solution for open public access? How could the Government best support this?**

Legislative requirement to provide the data, universal access and regulate pricing.

**Question 5. Provision for ad hoc access to publicly accessible chargepoints will be mandated by AFID. Is mandating a minimum specific ad hoc access method for consumers preferable to a roaming platform / bilateral roaming solution in the UK market? If so, should there be a minimum access method that is most appropriate as a minimum standard?**

Roaming Platform should be available to any user, however account needs to be taken of providers such as TESLA who look to have charging packages included in the price of the vehicle.

**Question 6. How should operators of chargepoints and hydrogen refuelling stations and networks best display and make available pricing information for users?**

It should be legislated as the same for all users, it is then irrespective which platform is used or what method of display is used. We would expect that goods operators will be able to continue to purchase as they often do now, with fuel cards.

**Question 7. If required, in what comparable format should the pricing of electricity from a chargepoint and hydrogen from refuelling stations be specified as a minimum? What other relevant regulations / guidance on consumer pricing is already in place, and could this be used for these purposes?**

Whichever format is used it needs to be simple and clear so as not to cause confusion.

**Question 8. Do you agree that the Government should take powers to allow for new technical standards to support smart charging?**

Yes we agree with this point, and that consumers should be able to sell back to the grid or build credits

**Question 9. Do you agree that that technical standard requirements would best apply on sale and installation of a chargepoint?**

Yes we agree.



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**Question 10. What could the direct costs of this capability be, and on which party are they likely to fall?**

No comment on cost, but the consumer pays in the end irrespective.

**Question 11. Are there any other regulatory or non-regulatory ways by which widespread smart charging capability could be achieved?**

Via an App on a smart phone, linked to payment method.

**Question 12. Do you have any other comments on government's proposed intervention in this area?**

Consumers should be allowed to use charge points to provide power back into the grid from on-board charging, this could be used as credits for future charging.

**Question 13. What provision of fuel for EVs at Motorway Service Areas, and at fuel retailers, is necessary now, and desirable in the short, mid and long-term futures? This might include recharging infrastructure for battery electric vehicles, and/or hydrogen refuelling for fuel cell electric vehicles.**

EV Charge points are few and far between and where in place are limited. Length of charging needs to be taken into account for EV's.

**Question 14. Can provision of fuel for EVs at Motorway Service Areas, and at fuel retailers, be improved by non-regulatory means?**

If cost is not regulated then MSA's will only increase when they believe it is competitive, they should therefore be required to supply by regulation.

**Question 15. What standards of provision and availability should be provided by EV infrastructure at Motorway Service Areas, and at fuel retailers?**

Provision will be the pertinent point when purchasing these type of vehicles, EV's can be charged at home so it is not as important.

**Question 16. What would the impacts of mandatory provision of fuel for EVs be on Motorway Service Areas and fuel retailers, and how might this vary between different sizes and types of fuel retailer?**

The market will determine this MSA's will introduce more as demand rises as will fuel retailers, however spending hours attached to charge points is not viable at fuel retailers, unless they are attached to supermarkets, coffee shops etc.

**Question 17. Should provision just be required at some fuel retailers, and how should they best be differentiated?**

It is unlikely normal fuel station forecourts will be used for EV's as the dwell time of the vehicles is very high.

**Question 18. Are there any other strategic sites might it be appropriate to require provision of fuel for EVs? For example, train stations, bus stations, public carparks, retail/leisure developments, hospitals, educational establishments. For any such locations, who should be responsible for providing the fuel for EVs?**

It should be an important part of any infrastructure build and should become a formal requirement to provide on any new retail sites, distribution parks etc.

**Question 19. Would granting franchises for hydrogen refuelling infrastructure help attract investment?**

Hydrogen supply will be costly so may be very limited without Government assistance.

**Question 20. Do you agree this method of enforcement is proportionate to potential offences?**

The proposals seem proportionate.



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**Question 21. Are there other measures, that alongside enforcement, the Government should consider to encourage compliance? If so please explain your views.**

If failure to comply after warning or fine will fines increase? If so they must be sufficient to make them comply.

**Question 22. What appropriate factors should be taken into account when determining the level of civil penalty which should be levied for non-compliance with data accessibility requirements?**

No comment.

## **Final Comments.**

7. The initial infrastructure should include the Heavier Vehicle fleet as advancements follow very quickly behind general consumer use.
8. It is vital that the ability to refuel is not restricted by contractual arrangements – monopolies must be avoided. The whole market needs to be able to use all the available infrastructure, with no vehicles being prevented from using a given providers infrastructure (providing of course they pay for the energy). (All vehicles can buy petrol from any provider if they need to now – EV energy needs to be similarly available).
9. The cost of producing hydrogen needs to be taken into account and must be renewable; if unlikely to be widely used and the cost of infrastructure is overly expensive the funding used for advancement may be better used to develop EV's further.

22 November 2016  
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