

Networks Directorate
Utility Regulator
Queens House
14 Queens Street
Belfast BT1 6ER

3 January 2020

Dear Sir or Madam,

Consultation on Maximum Resale Price (MRP) for electricity as it applies to Ultra Low Emission Vehicles (ULEVs)

Sustainable NI welcomes the publication of the consultation on the Maximum Resale Price (MRP) for electricity and its application to Ultra Low Emission Vehicles (ULEVs).

We agree with the overarching statement in the discussion paper that the Maximum Resale Price (MRP) for electricity is a barrier to the maintenance and development of public charging infrastructure for Ultra Low Emission Vehicles (ULEVs) and for that reason, we are in favour of Option 1 whereby the Utility Regulator amends the existing Direction to include an exemption for the resale of electricity where it relates to the propulsion of a ULEV.

However, as the discussion paper alludes to, there will be a direct impact on consumers. In order to protect the consumer, we recommend that the following are considered as part of the Utility Regulator's future work on the energy transition along with its partners:

- **Price transparency** – Transparency in the electricity element of the cost of charging a ULEV is essential so that consumers are able to make an informed decision about where to charge their car based on cost.
- **Instant Access** – As new operators come onto the market, consumers may have to download and use different apps to access different charging stations. Given that Northern Ireland shares a land border with the Republic of Ireland, it would be helpful to consider placing a requirement on network operators to enter into an all island, universal operating mechanism to ensure instant access to electricity and continued interoperability both sides of the border.

Whilst the latter may be outside of the control of the Utility Regulator, the former issue may be resolved through secondary legislation on price transparency brought forward alongside Option 1.

We would also like to take this opportunity to note that this consultation process brought to light the lack of knowledge, information and expertise currently in the public sector in Northern Ireland on the EV market. We also note that there is no stakeholder group or task force taking forward work to support the large scale deployment of EVs here in Northern Ireland.

We look forward to hearing the outcome of the consultation and we would be pleased to provide additional opinion if it would be helpful.

Sincerely,

A handwritten signature in black ink that reads "Nichola Hughes". The script is cursive and fluid, with the first name "Nichola" and the surname "Hughes" written in a single continuous line.

Nichola Hughes

Executive Director