

# CHARGING ELECTRIC CARS MADE EASY

Short position paper of the Federation of German Consumer Organisations (vzbv) concerning the European Commission's proposal for an Alternative Fuels Infrastructure Regulation (AFIR).

**According to a Forsa survey commissioned by vzbv in December 2021, 14 percent of consumers are considering switching to an electric car due to rising fuel prices.<sup>1</sup> In order to make the decision easy for consumers, a sufficient and easily accessible charging infrastructure is indispensable. This means that consumers must be able to move freely within Europe with an electric car.**

A modern and future-proof charging infrastructure is characterised by the fact that electric car drivers can charge their cars anywhere in an easy manner, and that they understand the tariffs. In vzbv's view, it should be possible to pay with a payment card at all new charging stations from 2023 onwards. In addition, a price indication in kilowatt hours (kWh) should be mandatory for better comparability. Electric car drivers need comprehensive information on the daily prices for spontaneous charging, which is why price information for ad hoc charging must be transmitted to the respective competent authority in all EU Member States – in Germany, the Market Transparency Unit for Fuels. Furthermore, lawmakers need to ensure adequate and non-discriminatory prices and roaming charges.

## Payment made easy

Payment by card is a widespread payment method and it is necessary that consumers can use this payment method also for charging their cars. All consumers should be able to charge their cars easily without having to be technically savvy. In order not to exclude consumers without smartphones or with limited network reception, lawmakers should oblige operators to offer payment by card at all new charging stations, either through a card reader or the contactless function.

This also corresponds to the wishes of consumers: A consumer survey commissioned by vzbv showed that 82 percent of those surveyed (multiple answers possible) want to pay with a debit or credit card when abroad in Europe.<sup>2</sup> Among younger people up to 29 years of age, the figure is as high as 94 percent. Payment by QR code is the least popular (22 percent), but also only 50 percent want to pay with a provider's charging card. Apps from digital payment services such as PayPal or Google Pay fare slightly better at 62 percent, but payment with a debit or credit card is the clear favourite.

❖ Consumers should be able to **pay by debit or credit card at all new public charging stations from 2023 onwards.**

<sup>1</sup> Forsa survey of vzbv in December 2021: Question F20

<sup>2</sup> Forsa survey of vzbv in December 2021: Question F18

### Fair prices made easy

'Charging roaming', i.e. making charging points accessible to customers of other providers, must not make charging disproportionately more expensive. The EU Commission's proposal for an AFIR includes that no additional charges should be levied for cross-border e-roaming. For national roaming, it likewise must be ensured that prices are reasonable and non-discriminatory and that charging station operators do not disproportionately differentiate between prices for end-users and mobility service providers (MSPs). National supervisory authorities, in their role as enforcers, must ensure through regular audits that there is no price discrimination.

Furthermore, charges that make charging more expensive after a certain charging period should only apply during the day. There should be no blocking fee (also called standing time surcharge) at night. That is because night charging is indispensable for consumers without their own charging point at home.

❖ It must be ensured that **prices and roaming charges are reasonable and non-discriminatory**.

### Price information made easy

It is crucial that consumers know where the nearest charging station is, what type of connection and power it has, and how many accessible charging spaces are available for people with disabilities. Dynamic data should inform consumers whether the charging point is in operation, whether it is available and what ad hoc price is charged. Therefore, operators of public charging and refuelling stations need to ensure the availability of static and dynamic data on the alternative fuel infrastructure they operate and provide free access to this data through the National Access Points (NAPs).

vzbv has long been advocating that lawmakers oblige all charging station operators to send data from their charging stations to a central authority. In Germany, this would be the Market Transparency Unit for Fuels (MTS-K), whose remit should be expanded to include ad hoc prices for charging electricity. The European lawmakers could include such an obligation for all Member States in AFIR. This is also demanded by 81 percent of respondents to a Forsa survey commissioned by vzbv.<sup>3</sup> This data can then be made available to electric car drivers on various digital applications (e.g. apps).

❖ For market transparency and consumer information, all data and especially the **price information for ad hoc charging must be transmitted to the respective competent authority in all EU Member States – in Germany, the Market Transparency Unit for Fuels**. The European lawmakers should oblige the Member States to set up such authorities where they do not exist.

Transparency also means that prices must be easily comparable. For vzbv, this means that operators should display prices per kilowatt-hour (kWh) - at least for standard AC charging. This is because time-based tariffs or "session fees" do not allow consumers to compare prices. Additional price components that control the

<sup>3</sup> Forsa survey of vzbv in December 2021: Question F19

parking or charging behaviour are possible, but must be communicated in a transparent manner. Furthermore, operators must ensure that consumers only pay for the amount of electricity that the charging station delivers to the electric car.

- ❖ Prices are only easily comparable if they are quoted in kilowatt-hours. Therefore, lawmakers should make it mandatory to **indicate prices in kilowatt-hours**.

Even if consumers do not have a contract with the charging station operator, they must be able to charge their car and find out the exact price beforehand. Therefore, the ad hoc payment option must be displayed in a transparent manner and be easy to use. In addition, operators must clearly display the ad hoc price and all its components at all publicly accessible charging points so that end-users are aware of them before they initiate the charging process. Transparent ad hoc charging prices are also important since they contribute to greater competition between providers.

- ❖ Convenient and **transparent spontaneous charging** is essential to facilitate access to charging stations for consumers.

## Contact

*Verbraucherzentrale  
Bundesverband e.V.*

*Team  
Mobility and Travel*

*Rudi-Dutschke-Straße 17  
10969 Berlin*

*Mobilitaet@vzbv.de*