

Attn: Deirdre Bell

The Commission for Energy Regulation.
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24

Date : 25th November 2013

Consultation CER /13/240

ESB Networks Proposed Electric Vehicle Pilot

Dear Deirdre,

Electric Ireland welcomes the opportunity to comment on CER's Consultation on ESB Networks Electric Vehicle Pilot.

Electric Ireland strongly supports the proposal – it is a timely, proportionate response to a range of on-going national and EU policy decisions and will position Ireland at the forefront of technical and technology developments in this area while also providing consideration of a suitable platform for the delivery of a market based response in the next phase of development. In this respect Electric Ireland particularly notes that the scope of the trial includes , inter alia, evaluation of the overall impacts on customers and engagement with suppliers on tariff options and the post trial market structure design.

Electric Ireland believes that there is an inevitable move and momentum towards electrification of transport at a national and European level. The 2012 government policy document - 'Delivering our Green Potential (Government Policy statement on Growth and Employment in the Green Economy'

(http://www.djei.ie/publications/enterprise/2012/Delivering_Our_Green_Potential.pdf) sees EV's as 'far more efficient in terms of their energy use than conventional vehicles and has set an ambitious initial target of 10% of the car fleet ..to be electrified by 2020'. The report identifies a role for Ireland to be 'an early mover in the provision of supporting technologies for EV's.. in areas such as ICT systems , payment systems , smart connection systems and charging infrastructure'. This position is also supported in the June 2012 report - Towards a New National Climate Policy: Interim Report of the NESC Secretariat (<http://www.environ.ie/en/Publications/Environment/ClimateChange/FileDownload,31202,en.pdf>)

Further support, in the context of the transition to a carbon-neutral Ireland, is suggested by the creation of a 'sustainable transport system ' in the December 2012 NESC Report : Ireland and the Climate Change Challenge : Connecting 'How much' with 'How To' ,

(<http://www.environ.ie/en/PublicationsDocuments/FileDownload,32467,en.pdf>) with specific reference to Electric Vehicles as one of six key exploratory projects to be undertaken. The report once again highlights that 'Ireland has an opportunity to be a real leader by building an institutional architecture' and references the role of networks and the smart electricity grid as an enabler in linking 'previously unrelated sectors, such as electricity and transport'. Electric Vehicles are mentioned as one of 'four technologies that Ireland can exploit to ensure that transport is more sustainable'.

Growth and innovation opportunities exist and will continue to emerge for companies who move first to embrace this move. EV's are expected to create a significant new customer electricity demand, with associated varied and challenging customer behaviours that will require an industry / market response. This could include for example development of varied processes for handling vehicle charging, payments at different geographic locations, billing etc.

It is clear that public engagement and interest in the development of an EV 'culture' within Ireland requires further and continued stimulation and the EV pilot provides an opportunity to promote greater public awareness as it progresses.

Electric Ireland notes CER's comments in relation to treatment and recovery of costs – it will be important that the pilot is delivered as efficiently as possible and that any consequential customer charges arising are monitored and kept to a minimum; and certainly not to exceed the 'absolute maximum' of €25m as proposed by CER.

Electric Ireland therefore supports a pilot study at this point, as scoped. There is widespread evidence and acknowledgement of the potential importance of EV's in the electrification of transport, and, in due course, as a significant contributor in terms of both customer choice and value and to a more energy efficient, low carbon / decarbonised environment.

Regards,

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