



NETWORKS

**ESB Networks Submission:
CER/13/240 ESB Networks Proposed Electric
Vehicles Pilot**

25th November 2013

1. Introduction

ESB Networks welcomes the opportunity to respond to CER's consultation paper CER/13/240 on Proposed Electric Vehicle Pilot. We support CER's view that further research is required and that the pilot project proposed by ESB Networks will inform how best the electricity distribution network will host 10% penetration of Electric Vehicles by 2020 which is Ireland's committed target. The proposals outlined in our previously submitted documents are vital steps in safely and efficiently determining the optimum method of managing the penetration of this magnitude of Electric Vehicles.

We are conscious of the clear environmental and governmental policy targets supporting the increased use of Electric Vehicles and the increasing selection of Electric Vehicles that are being offered by motor retailers in Ireland all increase the urgency of this research.. However, we understand that the cost of this pilot must be managed to limit the impact on electricity customers. It is absolutely necessary that the PR3 R&D allowance is increased to a level which allows an appropriate level of investigation into all of the potential impacts associated with the widespread roll out of Electric Vehicles.

ESB Networks looks forward to continued engagement on this topic with all of the stakeholders.

2. Submission

ESB Networks strongly support the proposed decision to allow an additional €19m to be efficiently spent to support an overall expenditure of €30.7m on the Electric Vehicle Pilot project.

We are of the view that the consideration of asset disposal as set out in Section 3.1 recognises the relevant IT and Electrical issues that are inherent in this project.

- *ESB Networks must design the EV pilot such that the assets and infrastructure could be sold to a third party. This option will be considered at the end of the trial as part of the options to minimise costs to consumers*

ESB Networks notes and recognises the potential for sale of the assets and infrastructure and that this is a decision to be considered at the end of the trial by CER. However, ESB Networks requests that the following be considered by CER before making its final decision.

- Competency to manage the electrical and physical assets associated with Electric Vehicle charging points located on public land
- The independence of choice of supplier and maintenance of full retail competition
- Maintaining a long term commitment to purchasers of Electric Vehicles
- Potential costs to third parties in setting up connection points including standing charges and connection charges
- Commitment of suppliers and ESB Networks to the development of the IT infrastructure to support Electric Vehicle charging and its linkages to other systems

The final decision on asset ownership or the level of divestment must protect the enduring needs of Electric Vehicle users and the safety of electricity system.

3. Conclusion

ESB Networks supports the CER's intention to increase the R&D allowance and looks forward to continued engagement with all relevant stakeholders.