

Nissan Ireland Submission in relation to the Consultation Paper on the ESB Networks Proposed Electric Vehicle Pilot

It is the view of Nissan Ireland that all global transport manufacturers will quickly move to offering either Pure Electric Transport solutions or Plug-in Hybrid alternatives. This move is already happening and we expect that most manufacturers will be offering several such models in their range in less than 5 years. These solutions will mandate the development of a charging infrastructure in every country.

The success of this transition will vary from country to country with the more successful ones reaping substantial benefits from significant reductions in CO2 output along with benefits for the electricity grid and customers. Ireland is in a unique position to capitalise on this development given her geographical size, population densities, climate and home ownership rates. However, this success will be completely driven by consumer confidence in the products and the totality of the transport solution that electric vehicles (EV's) provide as an alternative to their current choice.

To achieve this consumer confidence EV's must be supported by a widespread charging infrastructure that deals with the vehicle range restrictions associated with current EV's.

Unlike many new technologies which take a long time to get established and market tested, the majority of the Electric Vehicle Technology has been in existence for a very long time and is well proven. Therefore, there is little concern that this concept is in anyway technically inappropriate for the market and the purpose for which it is needed by the customer.

EV's offer the potential for significant societal and individual benefits from both a financial and environmental perspective. However, to achieve these benefits it is important that a comprehensive national charging network is developed by a competent body. It is our belief that ESB Networks as the distribution system operator is the best placed to deliver this requirement.

Without this infrastructure the development of consumer interest in EV's will be restricted. This is likely to lead to an ad-hoc take up by customers thereby negating the potential benefits that EV's offer. Customers must feel that they can travel where ever they want with the reasonable prospect of being able to reach their destination and return.

To make this level of mobility a reality the changing infrastructure must be rolled out on a full National basis. It is our considered view that most customers using EV's will charge their cars using a mixture of home and on-street charging. To make this practical the on-street chargers need to be regularly placed and highly visible. This means a high quantity of charge points in all urban areas in the country with fast chargers situated along all inter-urban routes. Ideally a customer should never be more than 50km from the nearest charger.

It is also critical that this infrastructure is of a high standard and conforms to existing and emerging international standards. This is the only way the products can be introduced into the Irish market without the need for expensive local adaptations to accommodate a local charging system.

With the right infrastructure in place we are confident that the obvious economic benefits achieved by driving an EV will persuade customers to move from their current petrol/diesel alternatives. The

Government objective of achieving 10% of the vehicle fleet by 2020 will need further effort. Proposals such as allowing the use of bus lanes and designated parking are relatively cost free and would generate significant benefits for the EV customer thus maximising the volumes.

Electric vehicles and the various hybrid technologies offer a unique win, win scenario for EV Owners, Electricity Customers, Government, Manufacturers and the Environment. We can provide a cost effective and significantly more refined alternative to traditional transport solutions which is far better for our Environment and our future. The advantages of this programme in aiding the achievement of our National CO2 targets are well documented. As such, Nissan Ireland welcomes the Regulator's proposal to support ESB Networks in this pilot.