By email to olev.enquiries@olev.gsi.gov.uk

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Office for Low Emission Vehicles
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33 Horseferry Road
London
SWIP

ELEXONs response to the Department of Transport consultation on ultra low emission vehicles measures for inclusion in the Modern Transport Bill

We welcome the opportunity to respond to this consultation that seeks to identify measures for inclusion in the Modern Transport Bill.

ELEXON Limited administers and operates the Balancing and Settlement Code (BSC). The BSC rules are designed to ensure there is an accurate allocation of energy volumes to users of the energy system (and although we use metered data our activity is separate from the billing of energy users by energy suppliers). We are independent of any part of the electricity industry and not for profit. The views expressed in this response are those of ELEXON Limited, and do not seek to represent those of the BSC Panel or Parties to the BSC.

We have provided a general response to your consultation covering areas that affect the BSC arrangements. This relates to the section of your consultation on 'Smart charging – infrastructure and the electricity system', questions 11 and 12.

Smart Charging – Infrastructure and the Electricity System

11. Are there any other regulatory or non-regulatory ways by which widespread smart charging capability could be achieved?

12. Do you have any other comments on government's proposed intervention in this area?

Currently all Electric Vehicle (EV) charging structure, that is not behind a meter within a property, has been required to be individually metered. Therefore all such charging points will have an associated Metering Point Administration Number (MPAN) that identifies its location using a unique thirteen digit number. This information would be held in the registration systems of the electricity distribution business responsible for the network to which the charge point is connected. We note therefore that

locational data can be obtained from distribution businesses in addition to EV charging infrastructure operators.

ELEXON regularly discusses future system requirements with industry and technology providers and recognises that new technology can drive different or new solutions which we need to account for. To this end ELEXON has recently been looking at how to facilitate EV charging via 'unmetered' connections to street lighting columns or other such 'on-street' furniture (e.g. feeder pillars). We are investigating amending existing arrangements to allow for electricity to be metered on a 'movable meter' that is part of the EV charging cable (which will be the property of the EV owner). Our proposals would accommodate these within central management systems (CMS). CMS are street lighting management systems where central software can switch or dim street lights through smart controls. All 'movable meter' charging points would have a unique thirteen digit identifier. The infrastructure operator would need to declare the location of each charging point to the distribution system operator (in their unmetered supplies inventory). The standard format is defined Section 8.2 of our operation information document (OID). You will see that this data contains useful location information such as the road name, longitude and latitude (or Eastings and Northings). In future therefore this new locational information could therefore be obtained from distribution businesses.

Balancing services for behind the meter charging in domestic or non-domestic premises – using the forthcoming smart meter rollout infrastructure?

Currently, there is no requirement for an EV owner to notify power companies if they are charging EVs on their premises. The smart meter roll out could provide infrastructure that can control the charging (or dis-charging) of EVs and therefore there may be an incentive on EV owners to take up new service offerings (including balancing services) that require an energy Supplier or network operator to record the EV charging point.

We note there are a few issues for your consideration in respect of the ability of EVs to provide balancing services:

- EVs are not considered to be 'Trusted Devices' under the smart meter arrangements. As such they cannot currently be controlled by Suppliers via any auxiliary load controllers (ALCs) via the smart meter. This issue could be resolved by changing the Smart Energy Code (SEC) to make EVs 'Trusted Devices';
- Only Suppliers can directly access the smart metering. So, although a distribution business, aggregators or National Grid could send demand response signals to EV owners they cannot directly control such load via the meter. However, such access could be implemented through binding EV control to the Consumer Access Device (CAD) or by other means of communication (e.g. the internet). Changes may be required to the SEC to allow other parties to control EV loads via the smart meter;
- ELEXON are currently putting in place requirements around the ability to collect half-hourly metering data from smart meters. However, there are currently no requirements to meter

or register ‘Active Export’ (energy passing from the home/business back to the grid) data for electricity settlement. This information may be required as ‘proof of delivery’ for any demand side actions, undertaken by EV owners, where the vehicle load is discharged;

- There are also data privacy issues to be considered in accessing granular meter data from domestic customers. Currently, customers in domestic premises have to give explicit permission to access such data. However as there is likely to be an incentive for the customer to share the data (e.g. payment for exporting energy) this should not be a barrier to innovation.

We would be happy to meet with you to discuss our response further or provide more detail on the unmetered arrangements we are looking to put in place to accommodate for ‘movable meters’. Please contact Kevin Spencer (kevin.spencer@elexon.co.uk) on 0207 380 4115 or David Jones (david.jones@elexon.co.uk) on 020 7380 4213.

Yours sincerely,

Kevin Spencer

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