

EVA England – short consultation submission to OFGEM

December 2025 ED3 Sector specific methodology consultation, closing 3 December 2025.

Link to consultation: [ED3 Sector Specific Methodology Consultation](#)

About EVA England

EVA England is a members' association dedicated to representing the interests of electric vehicle (EV) drivers solely and independently from commercial interests, including EV manufacturers and charging point operators. Our regular surveys of both EV and non EV drivers, and our ongoing discussions across our driver networks, allow us to provide an up to date and accurate picture of both the lived experiences of those driving EVs and the perceptions of those who do not.

High level short response:

For EV drivers (both current and prospective), the continued development of affordable and reliable public charging infrastructure at pace, combined with fair and equal access to private charging infrastructure, is an essential aspect of the consumer experience.

Addressing existing barriers to the installation of charging infrastructure is therefore crucial at this stage of road transport electrification amid the current challenge of convincing more drivers to take up EVs.

As a consumer body, we wanted to lodge our support for the premise of this consultation on the basis that it sets out a framework to improve the accountability, incentives and approach to delivering electricity connections that will ensure a fair and equitable roll out of EV charging infrastructure, namely through:

- Ensuring that networks are ready for rapid EV uptake;
- Accelerating and simplifying the process for providing connections for chargepoints for both domestic and commercial customers;
- Tracking and rewarding timely delivery of these connections;
- Ensuring there is no postcode lottery and that all consumers are able to fairly access connections; and
- holding network operators to account in managing the balance between investment and the level of cost passed to the bill payer.

However, the biggest barrier to EV uptake is now the charging divide – the fact that those without driveways are reliant on public charging and extremely high charging rates of up to 98p per kWhr, whilst those who can access private charging can take advantage of more affordable rates, often as low as 7p per kWhr.

Our EVA England survey results show that 50% of those without driveways find it more expensive to run their electric car than their previous petrol or diesel car, and that 60% of drivers without a driveway say they won't ever consider an EV.

It is therefore paramount that quick and urgent action is taken to bring down the price of public charging, primarily by bringing down the standing charges that chargepoint operators are required to pay, and exempting chargepoints from policy levies. The Public Charging Review announced at Budget 2025 must include these measures within scope and identify further, concrete actions to bring charging prices down.

The ED3 price control period must also clearly recognise that in its proposed revised framework, and in any subsequent further regulatory reform, it is critical not only to deliver charging infrastructure quickly, but also to deliver an outcome where the end charging price for the consumer is cheaper and more affordable - across both the private and public charging network.

Supporting evidence:

Our annual summer survey aims to capture the experiences and opinions of thousands of electric vehicle (EV), petrol/diesel, and hybrid drivers across the UK.

This year, **a total of 1,668 drivers responded, of which 1,279 were fully battery electric vehicle drivers**, 201 full petrol or diesel drivers, and 125 hybrid drivers (plug-in, full and mild).

The results highlight growing confidence among EV drivers, with 95% responding saying they would recommend these cars to friends and family, and more than 9 in 10 saying their EV is cheaper to run than their previous petrol or diesel cars.

Over two thirds (69%) highlighted real improvements in public charging infrastructure over the past year. Indeed 66% of petrol and diesel drivers responding say they are considering switching to electric; and 62% of those driving hybrid vehicles say that their next vehicle purchase will be fully electric.

However, the survey also showed that access to private or home charging and the cost differential between being able to charge at home and those being forced to rely on the public network is emerging as the single most important factor holding back the transition.

Charging costs at public charging points are considerably higher compared to private charging and vary enormously depending on the type of charging point. Those public chargepoints used for residential charging tend to be slow chargers below 8kW or fast chargers below 22kW. Overall, the average cost from home charging is 32p per kWh and 52p per kWh for public charging¹, but home charging can cost as little as 7p per kWh and public charging currently as much as 98p per kWh.

90% of EV drivers have off street parking, and 81% own a home charger. Therefore, whilst 87% of EV drivers with driveways are finding their EV cheaper to run, only 50% without driveways do.

60% of drivers without a driveway say they won't ever consider an EV (compared to 43% with a driveway).

Anecdotes from drivers include:

"Public charging VAT should be 5% as unfair to people who do not have access to home charging."

"An EV makes no financial sense for people who don't have access to home charging."

"With access to home charging the cost [of] the occasional public charge isn't an issue."

"[Running costs are] much lower but only because I can charge at home. If I had to rely only on public charging it would work out more expensive I think."

¹ [Zapmap Price Index - Average weighted price to charge on the public network - Zapmap](#)

This confirms one of EVA England's most persistent findings: drivers without access to off-street parking (of which there are an estimated 40% across the UK²) are significantly less likely to switch to an EV, and among those who have, they are less confident in their ability to make their car work for them, and face higher costs.

Survey data shows that this group is broadly representative of the average UK consumer, but with characteristics that heighten vulnerability to inequality in the EV transition:

- Homeownership: Among households with off-street parking, 91% own their home, compared to 62% among those without.
- Income: 38% of those without off-street parking earn under £50,000, compared to 27% of those with driveways.
- Urban concentration: 53% of respondents without off-street parking live in urban environments.
- Ownership model: 47% of drivers without off-street parking bought their EV second-hand, compared with 38% among those with driveways.

This demographic is more likely to rent, earn less, and live in cities - and without stronger intervention to ensure access to reliable, and affordable charging, they risk being excluded from the cost benefits of EV ownership.

As EVA England, we have consistently campaigned for measures to reduce the cost of public charging - including asking that EV charging is central to decisions being taken around electricity market reform and regulation; and reducing the VAT on public charging to bring it in line with the VAT on domestic charging.

We support the calls in ChargeUK's recent White Paper to urgently implement regulatory reforms that will bring down the energy costs that chargepoint operators need to pay – through tackling high standing charges and exempting chargepoints from policy levies³.

We also continue to emphasise the importance of alternative solutions that allow drivers without access to home charging to take advantage of the cheaper charging rates that those with private charging do - workplace charging, charge sharing and cross pavement charging are all viable options. And we ask for greater recognition of EVs as an opportunity for resilience of the energy system, by incentivising greater uptake of dynamic pricing across public chargepoints - allowing residents to take advantage of cheaper charging rates at times when electricity costs are cheaper - by industry.

The Public Charging Review announced at Budget 2025 should include these potential solutions within its scope, and identify quick and targeted actions that deliver a reduced cost for consumers at the chargepoint.

And this revised framework for the ED3 price control period must not only incentivise and reward faster and more efficient chargepoint connection rollout, but also a more competitive and affordable end price for the consumer across the private and public charging network.

² Electric Vehicles UK and New Automotive. Cost of Driving Electric: Report 2025. February 2025

³ [Action on high energy costs needed to keep EV transition on track](#)