

Dear Sir or Madam

With reference to your letter of 20 December 2012 on the application of the Maximum Resale Price to the resale of electricity for use by electric vehicles.

Elektromotive was formed in 2003 and is the UK pioneer of 'fuel stations for electric vehicles'. In 2011, Elektromotive was acknowledged as the European number one and global number three Electric Vehicle Supply Equipment (EVSE) vendor by global cleantech intelligence company Pike Research. Today, the company exports to 21 countries and has an installed base of more than 3,000 charge points, making it a leader in the EVSE sector.

Elektromotive support the recommendation that supply of electric vehicle recharging facilities is not subject to Maximum Resale Price.

Question 1: Do stakeholders consider that uncertainty over the current MRP provisions is a barrier to the commercial growth of charge point infrastructure?

Yes – installation and maintenance of charge point infrastructure for public access use incurs a considerable expense and is only viable for commercial operators if they can charge a fee for the service. The MRP if enforced does not enable a commercial operator to have a return on investment.

Question 2: Do stakeholders agree that charge point providers should be free to set prices for the electricity resold from charge points?

Yes – there will be various financial pricing models for use of charge points that will vary dependant on user, owner, location and type (7kW, 22kW, 50kW etc.) of charge point. The network operators and charge point owners need to be able to determine their pricing model.

Question 3: Do stakeholders consider that the proposed amendment to the MRP direction would provide sufficient clarity?

Yes

Question 4: Could there be any unintended consequences to the above proposal, or proposed drafting?

No comment

Question 5: Do stakeholders agree that the current MRP provisions should continue to apply to marine craft, including electric marine craft?

No comment

Yours faithfully,

Terry Brightmore
Commercial Director