Electric Vehicle Association Northern Ireland

DfE / UR Joint Call for evidence
A Review of the Connections Policy Framework in Northern Ireland

EVANI Response

The following response is provided by the Electric Vehicle Association Northern Ireland. EVANI is a representative body for drivers and businesses with an interest in Electric Vehicles. Our response is primarily concerned with demand connections and ensuring the effective expansion of the electric vehicle charging infrastructure for home users, workplaces and public access charging.

Questions

1. **What are the risks and opportunities in relation to the development of micro grids and what issues do these raise for the connections framework in NI?**

EVANI – We do not have a view on this question

2. **Do you agree with our guiding principles? Please expand your answer.**

EVANI – We agree with the guiding principles outlined and that facilitation of the NI Energy Strategy Targets and a just transition for consumers are crucial. However, we would add that Connection Policy is a key component of the development of a workable energy system, which is fundamental to the wider economic success of Northern Ireland within the region of the UK and Ireland. We believe that the UR and DfE must also be guided by a broader understanding of the competitive environment within which NI's economy sits. Balancing the wider economic needs of the region with a Just transition is vital.
In terms of future proofing the legislation. We believe that flexibility should be built in to enable the UR and network operators to be able to react quickly to changing demands and new technologies which may require connections as part of a modern energy system.

3. **Do you agree with our proposed scope in relation to this connection review? this includes:**
    a. **Are there other issues which you consider we should take into account. If so, please explain why**
    b. **Are there any connection areas we should remove from the scope of our review? If so, please explain why**

EVANI – We believe the exclusion of multiple domestic properties (12 or more) as noted at Point 5.5 is a mistake in terms of setting out criteria to promote the enablement of infrastructure for home EV charging. All research suggests that 80%+ of EV charging takes place at home, and we know that this presents a legacy challenge for NIEN in dealing with individual requests for installation. Setting a connection policy that incentivises implementing infrastructure backbones in the domestic market at the point of development would be a powerful tool in enabling the decarbonising of transport as a key component of the Energy Strategy.

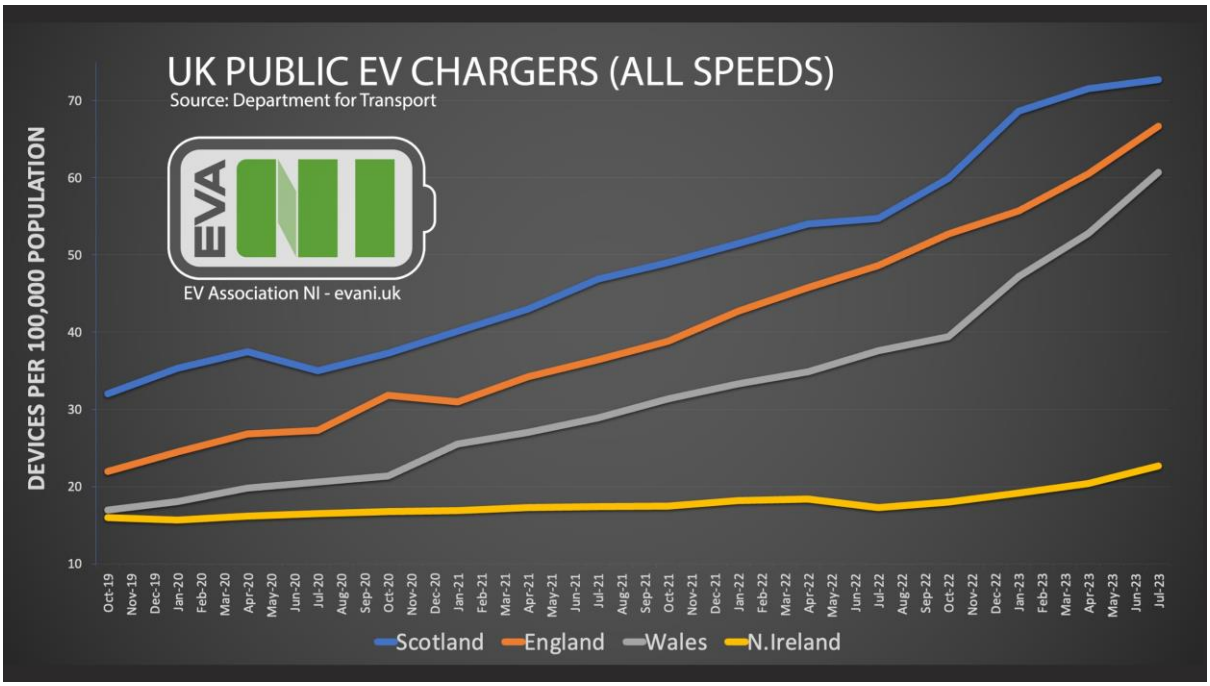
4. **Do you consider the current 'partially deep' connection boundary in NI appropriate? Please explain your rationale further and provide evidence.**

EVANI – No, the current connection policy is proving a significant disincentive to the expansion of a comprehensive and accessible EV charging network. Our members / CPOs have identified the cost of connections as a significant barrier to connecting new charge points, as the high cost makes the project uneconomic. CPOs tell us that connection costs in NI are between 3 times and 10 times what they pay in other regions. This is at odds with a just transition where all members of society have reasonable access to charging infrastructure regardless of location. We need a connections policy that enables the rapid expansion of access.

5. **Do you consider a shallow connection boundary to be appropriate in the NI context? Please explain your rationale further and provide evidence. If so, which of the following connection types should have a shallow connection boundary;**
    a. **Demand only**
    b. **Generation only**
    c. **Demand and Generation**
    d. **An alternate connection type (for example Domestic/Non-Domestic connections)**

    Please explain your rationale further.

EVANI – Our comments are based mainly on the need to enable demand connections for EV charging enablement (whether domestic, workplace or public), and would highlight the woefully low penetration of chargers in Northern Ireland compared to other parts of these islands – see graph below.



We know that the current high connection charges are preventing investment by CPOs as many locations are simply uneconomic to run a public or multi point workplace charging system. As the government's ban on new ICE vehicles in 2035, along with the ZEV mandate targets on volumes of EV's sold, drives a significant ramp up in EV's on the road, there must be a charging infrastructure to enable day to day life in all parts of NI – rural and urban locations. Access to rapid charging will be key to decarbonising the whole transport system, for both private cars as well as other road users. It is imperative that the blocks to this

are removed and the shallowest charging regime is in place for these types of connections to stimulate investment and implementation.
We also agree with others, including NIEN, that the new regime should drive benefits across the whole of NI as part of the Levelling up strategies and 10X economy plans. We have heard the UR mention in previous engagements that a shallow charging regime will have a disproportionate effect in NI compared to GB due to our smaller country. However, we see no evidence for this, especially in light of the DNO's response estimating a cost of just £3 per household per annum by 2030.
We would also note that our immediate neighbours in GB and ROI operate a form of shallow charging and since investment in charging infrastructure is likely to be private investor led, a level playing field is vital to ensure NI is not further left behind.

6. **Do you consider a shallow-ish boundary to be appropriate in the NI context? Please explain your rationale further and provide evidence. If so, which of the following connection types should have a shallow-ish connection boundary;**
    a. **Demand only**
    b. **Generation only**
    c. **Demand and Generation (for example Domestic/Non-Domestic connections)**
    d. **An alternate connection type**

    Please explain your rationale further.

EVANI - We feel that a shallow-ish regime, while better than the current regime, is simply a fudge that keeps in place a partial barrier of high costs for some aspects of new demand connections, and we strongly believe a Shallow regime is best, as outlined at Point 5 above.

7. **Do you believe that moving to a more shallow connection boundary in NI will deliver NI renewable targets that otherwise would not be met? Please provide evidence to demonstrate your answer.**

EVANI – Yes, we know that reducing connection costs for EV Charging points will drive a wider availability for public use as they become economic to operate. Access is crucial to decarbonising transport, in itself fundamental to meeting renewable and net zero targets.

8. **Please provide evidence on the potential impacts on energy affordability in NI if reinforcement costs where socialised further? What would the impact on energy affordability be in NI if household bills where to increase per annum by;**
    a. **1-3%**
    b. **4-7%**
    c. **7-10%**
    d. **> 10%**

EVANI – According to the published response from NIEN the answer would be a. We also know that a functioning transport system is crucial to the success of the wider economy so would urge the consideration to be put in context of all household costs and income, and overall economic growth.

9. **Can NIE Networks differentiate between RP6 allowances, RP7 business plan connection requests and how these differentiate and have been factored into the analysis that has been done on potential reinforcement connection costs analysis NIE Networks have completed?**

EVANI - No opinion on this matter

10. **Do you think that a developer led or plan led is the best approach for the future development of connections in NI? Please explain your answer.**

EVANI – Firstly we would note that there is no clear definition on what each approach entails and how it would be operated. We believe that a developer led approach would be effective in ensuring grid reinforcement is driven by likely demand for access to charge points, as assessed by CPOs. However, we would combine this with planned anticipatory grid investment to ensure backbone networks serve the whole province. We commissioned an analysis of substations here which shows that over half (54%) have just 3-5MVA capacity or less - there is little to no room for business expansion without network upgrades on a system wide basis and this should form an underlying upgrade plan to complement Developer led projects.

11. Do you think the current 3-month timeframe for SONI and NIE Networks to issue a connection offer is appropriate? Please explain your answer.

EVANI – We believe that a faster system for charge point specific demand connections is warranted to speed up the roll-out of access to crucial infrastructure for decarbonising transport. This could be tiered for various sizes of connections with faster turnarounds at lower levels.

As noted earlier we are in a competitive environment with GB and ROI for investment money for Charge Point roll-outs, and investors will follow the speediest path to deployment offered elsewhere.
We would also like to see new statutory SLAs (Service Level Agreements) form part of new connection regulations to ensure timely grid connection offers are available from the DNO. These time scales should be robust and network / harmonic studies etc should not be allowed to move the application to an indefinite time-scale.

12. If our legislation facilitated it, should obtaining planning permission be a pre-requisite in order to receive a grid connection? Please explain your answer.

EVANI – We understand the need to avoid grid blocking by having connections allocated but unused, however we believe it would be more appropriate to have planning approval running in parallel rather than a pre-requisite which risks lengthening the overall time for a development. To avoid blocking, it would be reasonable for applicants to show that they have applied for any required planning within a defined period and that they commit to taking up and activating the connection within a reasonable timeframe, potentially 12 months for these types of connections. Also, it is worth noting that not all demand connections for EV charging systems would require Planning Permission.

13. If our legislation facilitated it, do respondents consider any other issues associated with the current queue process? Or that a different approach to managing the connection queue, would result in quicker connections? If so, what would that be? Are there any lessons to be learned from other jurisdictions?

EVANI - Queue management must have defined timescales and reasonable flexibility to process demand connections. We would like to see more active information on network availability to enable developers to assess where to focus applications within wider roll-out plans.

14. Do you have any other information relevant to the subject matter of this Call for Evidence that you think we should consider?

EVANI - The DNO's published consultation response mentions that 'Prosumers' need to pay more fixed costs as they are not paying their share via volume based DUoS charges. However, the other side of that is customers with EVs (and heat pumps etc) are currently paying more than their fair share via volume based DUoS charges. So any increase in costs for those that are using less from the grid, should be balanced with reduction for those that are using more.

15. Please list any connection issues you have raised in order of priority. Please explain your reasoning behind your priority

EVANI – 1. Cost, 2. Timeframe for grid offer, 3. Timeframe for remedial works