ChargeUp Europe

Making the Case for Private Charging under the Energy Performance of Buildings Directive

ChargeUp
EUROPE

ChargeUp Europe: position on the Commission proposal for the Revision of the Energy Performance of Buildings Directive

ChargeUp Europe is the voice of the electric vehicle (EV) charging infrastructure industry. ChargeUp Europe has been formed to accelerate the switch to zero emission mobility and ensure a seamless driver experience with access to high quality, readily available charging infrastructure across Europe.

We welcome the European Commission's forward-looking proposal for the revision of the Energy Performance of Buildings Directive (EPBD). The following document outlines ChargeUp Europe's views and recommendations on the EPBD proposal.

Proposal for the Revision of the Energy Performance of Buildings Directive

Widespread and easy EV charging options will be critical to drive the uptake of electric mobility. The Commission's EPBD proposal therefore comes at a critical time to accelerate Europe's shift towards e-mobility. At the same time, EVs and charging infrastructure can play a critical role in making buildings more energy efficient, managing grid capacity through smart charging and contribute to the EU's Green Deal objectives.

The Commission's proposal rightly recognizes the key role of EV charging in decarbonizing the EU building stock and paves the way to ensure the uptake of e-mobility across the European continent.

The Commission's proposal contains many positive, forward-looking provisions and we very much welcome the inclusion of ambitious EV charging infrastructure targets, the emphasis on smart charging, and the proposed requirements on consumer empowerment to make the installation of EV charging infrastructure in private locations easier and more accessible.

While we welcome the EPBD proposal, there are some key aspects that require further attention to ensure that the complementary benefits from integrating buildings and transport are fully utilized.

EV charging infrastructure requirements and targets should be increased to properly reflect the future needs of the fast-growing EV market

The proposed infrastructure targets set under the EPBD are a good step in the right direction. At the same time, a significant scale up of EV charging solutions at private locations is required to cope with the fast-growing EV market. The current provisions fall short on setting the right conditions for the mass adoption of EVs.

As private (residential and workplace) charging will remain the most important EV charging use case throughout Europe, it is important that buildings (public and private, residential and commercial) offer widespread EV charging solutions. **ChargeUp Europe would therefore like to make the following recommendations:**

With regards to non-residential buildings:

1) **All existing non-residential buildings should be ready for EV charging by 2035, with intermediate targets for 2025 and 2030.** ChargeUp Europe therefore recommends that all non-residential buildings with more than five parking spaces should have pre-cabling for one in two parking spaces by 2025, 70% of parking spaces by 2030 and 100% by 2035.

2) Expand the scope of article 12, paragraph 1 to include targets for new non-residential and non-residential buildings undergoing major renovation with **more than three parking spaces.** This also counts for new office- and office buildings undergoing major renovation.

3) Ensure the installation of at least **one recharging point for every five parking spaces by 2025** for **all existing non-residential buildings with more than ten parking spaces**.

4) Non-residential buildings owned or occupied by public authorities should **ensure pre-cabling for at least one in two parking spaces by 2027.**

With regards to residential buildings:

1) **Introduce pre-cabling requirements for existing residential buildings.** There is a huge gap in the EPBD proposal when it comes to providing sufficient charging solutions at residential private locations. ChargeUp Europe therefore argues that existing residential buildings with more than five parking spaces should have pre-cabling for one in two parking spaces by 2025, 70% of parking spaces by 2030, and make sure that they are 100% EV ready by 2035.

2) Ensure the **installation of at least one recharging point** for new residential and residential buildings undergoing major renovation with more than three parking spaces, and pre-cabling for every parking space.

3) Ensure the installation of at least **one recharging point for every five parking spaces by 2025** for **all existing residential buildings with more than ten parking spaces.**

All these charging stations should be **digitally connected and smart charging capable** to enable the integration of the building management system and fully optimize balancing, storage and flexibility options. Charging stations should allow monitoring and remote supervision by the Charge Point Operator (CPO), enable a minimum level of control such as shifting the start time of the charging session in response to the price signals. They should also allow adaptation to the power level of charging, and facilitate intermitted charging. At the same time, interoperability between EV charging stations should be ensured by applying open communication protocols and standards.

Introduce reporting obligations to ensure a holistic approach on EV infrastructure deployment

Member States must take a comprehensive view on all EV charging use cases and infrastructure in their country. This is necessary to ensure the smart deployment of publicly accessible chargers and grid investments, and to avoid stranded assets. The revision of the EPBD should therefore be coherent with the ongoing revisions of the Alternative Fuels Infrastructure Regulation (AFIR) and the Renewable Energy Directive (RED).

ChargeUp Europe therefore recommends that EU countries report on the targets for non-publicly accessible charging stations as part of the national policy framework reporting process proposed under the Alternative Fuels Infrastructure Regulation. This will make sure the right policy enablers are put in place at national/local level to stimulate the uptake of private chargers.

This is especially important considering the long timeline of construction and renovation projects, as they are often multi-year projects that require significant planning. Buildings that are being designed today for construction or renovation over the next years must keep these targets in mind. Otherwise, an important opportunity will be missed.

Enforce the Right to Plug to make the installation of EV charging infrastructure more accessible

ChargeUp Europe very much welcomes the strong focus on **EV driver empowerment by removing certain regulatory and administrative hurdles to the installation of EV charging infrastructure**. It is of primary importance that provisions to simplify the deployment of charging points at private locations, as well as regarding the availability of technical assistance, are maintained under the revised legislation to facilitate the smooth transition towards e-mobility.