



PUBLIC CONSULTATION ON ACCESS TO VEHICLE DATA, FUNCTIONS AND RESOURCES

ChargeUp Europe calls for:

- ✦ Equal access rights to data, functions and resources including guidelines and requirements on data quality as well as the frequency of communication/data sharing, based on mandatory fair, reasonable and non-discriminatory terms.
- ✦ The list of vehicle data, functions and resources accessible on a specific model or version of a vehicle would need to be published or otherwise made available by the vehicle's manufacturers.
- ✦ Reporting obligations for manufacturers to be introduced, to inform competent authorities (e.g., type-approval authorities and the Commission) about the implementation of such access rights.
- ✦ Legislation to recognize that access to data in itself is not sufficient, but a successful exchange of data in a seamless, coordinated and timely manner based on existing and open standards is required.

ChargeUp Europe welcomes the European Commission's public consultation on access to vehicle data, functions, and resources. ChargeUp Europe is convinced that ever-increasing amounts of data will have a significant impact on the transport ecosystem. Therefore, the upcoming initiative comes at a critical time in Europe's transformation to a smart, digital and sustainable economy.

The ever-increasing uptake of EVs is developing at a very fast pace. EV drivers need to be

guaranteed access to reliable and secure charging infrastructure and it is therefore imperative to have an open market approach ensuring more consumer-friendly experience. In this regard, access to in vehicle data will help accelerate transport innovation and EV adoption, through better charging infrastructure planning, grid optimization, energy management and an improved EV charging experience.

With charging stations getting smarter and more integrated with the electricity grid, data flows

between the vehicle, charge point, and the electricity grid become more extensive and essential. Smart charging operations (including Vehicle-to-Grid) rely on minimum data exchanges to provide high value-added, user-centric services. To deliver the best possible service from a grid or EV driver perspective, charge point operators need to access EV data such as battery size, battery State-of-Charge (SOC), battery charging ramp-rate or other customer preferences (e.g., preferred state of charge when departing) provided by the vehicle dashboard.

Today, car manufacturers have full control over the collection and processing of data produced by the vehicles without any guarantee that such data will be made available to third-party service providers such as smart charging operators or EV trip planning app developers. The de facto ownership of vehicle-generated data and safeguard thereof by technical protection measures and contractual restrictions have the potential to erect barriers to entry and development in the automotive industry. Leaving the accessibility to such data to contractual freedom creates concerns with regards to costs of access and the inequality of bargaining positions between automotive manufacturers and new entrants in the automotive markets, irrespective of the latter's area of activity.

Provided the consent of EV drivers, access to vehicle data will be a major prerequisite for a fair

competition to emerge and deliver the most valuable services to end-users. Moreover, guaranteeing fair access to EV data will enable compliance with other consumer rights related legislation in electricity markets. For example, features like preconditioning of the EV battery, which have substantial impact on competition and user experience, will have to be made available to all market players and should not be used for vehicle preferred infrastructure only.

Access to vehicle data is crucial for the development of fair competition and innovation in mobility industries, and the addition of a requirement for automotive manufacturer to make such data available on fair, reasonable and non-discriminatory terms, while respecting EV driver's rights, appears key to foster competition and innovation in new mobility markets. For example, the development of new business models will depend amongst others on easy and ready access to in vehicle data. While an EV is charging it is connected to a smart network. While connected its location is known (even when parked underground) and usually the time connected, and duration is known. With these data points e-commerce service providers could drop parcels off or dry cleaning to the boot of these vehicles preventing unsuccessful deliveries to home or alternative addresses where no one is available to take delivery.

ChargeUp Europe is the voice of the electric vehicle (EV) charging infrastructure industry, bringing together the charge point operators, e-mobility service providers and hardware manufacturers, with the aim of ensuring a seamless charging experience for all European EV drivers. As of today, our 22 member companies represent over 500.000 charging points in all 27 EU Member States.



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