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Re: Notice of intention to accept binding commitments in relation to certain exclusive arrangements for the supply of electric vehicle chargepoints (case 51050)

Citizens Advice welcomes the opportunity to provide a short response to the CMA's minded-to decision to accept the proposed commitments with regards to long-term exclusive arrangements for the supply of electric vehicle chargepoints on or near motorways.

Since 2014, Citizens Advice has been the statutory advocate and advice provider for energy consumers. Our vision is for an energy market that is inclusive by design and recognises the essential nature of energy supply. It should facilitate and encourage innovation, be accessible by all and treat everybody fairly, regardless of their circumstances.

We agree in principle with the CMA's minded-to decision. However, we are keen for the CMA to understand the views of other motorway service area (MSA) operators about how the commitments are likely to impact their ability to participate in this market, before making a final decision.

The commitments will prove successful if they result in a more competitive market in which a broader range of parties can participate. We recently set out our views on this topic in our response to OZEV's transport regulatory review regarding zero-emission vehicles.¹ More competition, supported by the removal of exclusivity clauses, should encourage innovation and drive up standards in customer service and consumer choice. This will be essential for increasing the uptake of EVs, especially for lower income groups for whom competitive pricing and a variety of options are likely to be important factors.

For this to be realised in practice, the commitments must improve the ability of other MSA operators to secure investment and enter arrangements with chargepoint operators (CPOs).

¹ Citizens Advice (2021) [Citizens Advice response to OZEV's transport regulatory review: zero-emission vehicles](#)

Like the CMA, we will be interested to hear views from other MSA operators. In principle, we agree that the proposed trigger point for the removal of exclusivity should provide a certain and easily identifiable date for MSA operators and other CPOs as to when Gridserve would cease to enforce exclusivity, thus enabling them to participate in this market.

However, other MSA operators will be the experts on how this is likely to play out in practice, so it's important that the CMA takes into account views from MSA operators before making its final decision.

We are pleased to have the opportunity to understand the progress made with the investigation and respond to this minded-to decision. We are happy to discuss any of our views further.

Yours sincerely,

Rachel Mills

Senior Policy Researcher, Citizens Advice