



UFE answer to the Roadmap on the revision of the Directive on intelligent transport systems (ITS)

UFE welcomes the consultation of the European Commission ahead of the revision of the Directive ITS. In light of the surge of electric vehicles (EVs) on the market in 2020, expected to be continued in 2021, the French electricity industry would like to highlight the need to integrate several aspects regarding electric vehicles (EVs) in the revised Directive.

UFE would like to present further inputs on the **specific objective 3 to ensure data sharing and access**:

1. To guarantee the development of new intelligent services for EVs and charging infrastructure, the EC must ensure **non-discriminatory access to relevant data on EVs (e.g. state of charge of the battery), for all types and brands of vehicles, and for all concerned actors.**

Smart charging (a form of demand response with EVs) and **V2G** (feeding back energy of the EVs to the grid) enable to increase the use of (locally) **renewable energy**, to optimise grid investments, to better anticipate the impact of EVs on networks and can bring **financial rewards** to the **end user** (higher consumption of off peak electricity) and the site owner (cheaper connection to the grid). However, respecting the constraints of the user (departure time and requested energy) is key for this, in order to bring a good experience. For that, knowing how much energy is still left in the battery (technically known as **state of charge**) is key. The **ISO 15118** (a communication protocol between the vehicle and charging point) will enable the access to the state of charging but also to other external parameters such as information on the energy mix, cost of electricity, departure time, etc. For these reasons, it is important that car manufacturers implement the ISO 15118 and **give third party access to battery information in a non-discriminatory way.**

2. **Standardised framework to access data should be applied in order to organise data sharing on charging.** Simplified provisions for information and data transfer should be ensured in consistency with the rules of the GDPR to obtain consumers' consent. Information should be made available on the location and access of charging infrastructure.
3. To improve and strengthen the **interoperability of charging infrastructure for electric vehicles**, the EC should push for the harmonisation of the communication system at EU level and develop further the standard ISO 15118.