

# **ELECTRIC VEHICLES AND CHARGING CROSSBORDERS INFRASTRUCTURE**

## **Legal framework for the installation of charging station infrastructures**

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## **Legal framework for the Installation of Charging Station Infrastructures**

In the 2nd Article of the transposition into Greek law of Directive 2014/94/EU of the European Parliament and of the Council of 22nd October 2014 on the development of alternative fuel infrastructure and the simplification of the license process and other frameworks, are given the definitions for power charging points.

According to paragraph 4, the "normal power charging point" is the charging point that allows the transfer of electricity to an electric vehicle with a power of up to 22 kW. There are excluding machines with a power of up to 3.7 kW which are installed in private homes and they are not publicly accessible.

In paragraph 5 there is the definition for the "high power charging point" which is charging point that allows the transfer of electricity to an electric vehicle using a power source higher than 22 kW.

In Article 4 of the same law, for the electricity supply of transport, it was ensured that until 31 December 2020 there was a sufficient number of charging points for the EV users, in order to ensure that electric vehicles could travel at least in urban / suburban and other densely populated areas. The number of these charging points was determined by taking into account, the number of electric vehicles that was registered by the end of 2020.

The paragraph 3, states that charging points for normal power electric vehicles (except from those with wireless or induction modules) which will be developed or renewed

from 18 November 2017, must meet at least the technical specifications in Annex II, point 1.1 and the specific requirements defined on a case-by-case basis in national law, in accordance with 51157 / ΔΤΒΝ 1129 / [17-5-2016](#) joint ministerial decision (B' 1425). For the purposes of the present, no. 529 / 11.1.2000 ministerial decision (B' 67) is not applied.

- Annex II, point 1.1 Charging points with regular power for electric vehicles.

AC power charging points for electric vehicles are equipped (for interoperability purposes) at least with type 2 plugs or connectors, as described in standard EN62196-2, into the directive 2014/35/ EU incorporated in Greek legislation with no. 51157 / ΔΤΒΝ 1129 / 17-5-2016 joint ministerial decision (B '1425). These sockets should be equipped with features such as safety shutters (contact protection). This is because the type 2 compatibility should be maintained.

Paragraph 4 states that high-powered electric vehicle recharging points (except from those with wireless or induction modules) which will be developed or renewed from 18 November 2017, must meet at least the technical specifications in Annex II, point 1.2.

- Annex II, point 1.2. High power charging points for electric vehicles.

AC power charging points for electric vehicles are equipped (for interoperability purposes) at least with type 2 connectors, as described in standard EN62196-2 of the Directive 2014/35 / EU incorporated into Greek law with the no. 51157 / ΔΤΒΝ 1129 / 17-5-2016 joint ministerial decision (B '1425). DC high-power charging points for electric vehicles are equipped (for interoperability purposes) at least with a "Combo 2" charging, as described in the corresponding standard EN62196-3.

In Paragraph 7, for the charging of electric vehicles at publicly accessible charging points, intelligent measuring systems can be used if it is technically and economically

feasible. It is defined in article 3 of Law 4342/2015 (AD 143) and it is in accordance with the requirements of paragraph 2 of Article 11 of that law.

In Paragraph 8 it is stated that the managers of publicly accessible charging points (Operators of PC Charging Infrastructure), as they are defined in the framework of the article 137 of Law 4001/2011 (A' 179), they are free to buy electricity from any electricity supplier. The supplier should hold a supply license in accordance with Article 134 of Law 4001/2011. Charging point's managers have the possibility to provide electric vehicle charging services to customers on a contract basis and on behalf other service providers.

In paragraph 9 it is stated that all publicly accessible charging points provide the possibility of an ad-hoc charge for the users of EV, without the obligation to have a contract with the electricity supplier or manager.

### **National Plan for the Promotion of e-mobility**

Greece is in the first line of the climate change efforts, trying to eliminate the sales of vehicles with internal combustion engines from 2030.

For this purpose, Greek government introduces the second cycle of the program "I move electrically", which starts in April 2022. In particular, the new cycle of "I move electrically" will have retroactive effect from 1.12.2021 and citizens will be able to submit their applications until 31.12.2023.

220 million euros from the Recovery Fund will be used for this program targeting to enhance the e-mobility in Greece in an attempt to be aligned with the goals set in the climate law. The following incentives are provided:

For individuals:

- Increase of the subsidy for the purchase of new electric car to 30% from 20% and up to the amount of 8,000 euros from 6,000 euros.
- Extra subsidy of 4,000 euros, on top, for the purchase of an electric car on the islands.

Corporate car fleets:

- The allowed number of subsidized vehicles increases to 20 from 3 which was until today and to 6 for the companies operating on the islands, with the subsidy being increased from 15% to 25% on the retail purchase price with a maximum amount of 8,000 euros.
- The obligation to purchase the vehicle at the end of the leasing period is now abolished.

Furthermore, the program gives the possibility of a 40% subsidy for the purchase of up to 10 electric bicycles for companies operating in the sector of renting tourist bicycles and distributing food at home (delivery).

Regarding the decisions of leasing companies, it is now at the level of the mother company and not in local level. However, rental companies make offers on electric vehicles and they also have electric vehicles of their choice, which was not possible in Greece 2 years ago.

Regarding the rental of electric vehicles on the islands, the electric drive can be considered successful. The reason is that the distances are shorter respect to the mainland and even if the island is still not well covered by chargers, the EVs can still round without problems.

### Cab (Taxi):

There will be a subsidy of up to 22,000 euros for the replacement of conventional taxis with electric ones through a separate program which is funded with 40 million euros by the Recovery Fund.

The goal set in the climate law is the circulation of only electric taxis in the urban centers of Athens and Thessaloniki from 2025.

### **Forecasts for the Spatial Distribution of the Charging Infrastructures of Electric Vehicles**

The battery chargers for the electric vehicles are installed, for spatial and road safety reasons, in suitably designed areas near parking spaces that are located within the authorized areas. In particular, the installation of the devices must:

- a) Not block the regular flow of the vehicles and the safe movement of pedestrians,
  
- b) Not obstruct the orderly and functional layout, delineation of the main and complementary activities and other permitted uses, which take place within the courtyard (uncovered) area of the plot or field of the property of the existing or licensed facilities of article 1.
  
- c) Be designed in spots of the public road network in areas within the city plan, where the parking of vehicles is allowed parallel or perpendicular to the road axis, as well as on the sidewalk, occupying part of its width and which are demarcated and are in accordance with the provisions of the Building Regulations.

- d) Be in suitably designed areas within the parking of public and private buildings, terminals or public passenger transport stations and should also be demarcated.
  
- e) In accordance with the provisions of Ministerial Decision No. 52907/28122009 "Special arrangements for the service of persons with disabilities in common areas of settlements designed for pedestrian traffic" (B '2621).
  
- f) At suitably designed points within the Motorway Service Stations (Σ.Ε.Α.) along sections of motorways and/or road sections that are included within the project boundaries assigned by a Concession Agreement.

For the covered areas in which the charging devices of electric vehicles are to be placed, the framework for the dangerous areas of category B '(charging areas of electric vehicles) are applied, according to paragraph 6.7 of article 6 of presidential decree 41/2018 "Building Fire Protection Regulation" (A '80).

In Greece, the plan is to install around 10.000 charging stations within the next 5 years, in order to support drivers of electric vehicles. Currently, there are around 1.200 charging stations from which 100 are DC fast chargers.

### **Legislative Framework regarding the technical specifications for the installation of charging devices within the Charging Station Infrastructures.**

In the article 4 of Joint Ministerial Decision 42863/438/2019 - Government Gazette 2040 / B / 4-6-2019 there are the technical specifications of charging devices for

batteries of electric vehicles of the Joint Ministerial Decision with number 42863/438/2019 Government Gazette 2040 / B / 4-6-2019. In paragraph 3 it is stated that the acceptable charging methods for electric car batteries that may be applied to existing or under license construction installations referred to in paragraph 1 of Article 1, is Method 3 (Mode 3 AC Charging) and Method 4 (Mode 4 DC Charging), as defined by the prototype EN/IEC 618511 "Electric Vehicle Conductive Charging System".

Moreover, the acceptable interconnection elements (socket, plugs, and terminals) of these chargers are defined by standard EN/IEC 621962 "Plugs Socket outlets, Vehicle Couplers and Vehicle Inlets Conductive Charging of Electric Vehicles".

In particular, in order to ensure the necessary interoperability, the acceptable terminal for recharging batteries by method 3 is defined by standard EN/IEC 621962 "Type 2" and the acceptable terminal for recharging batteries by method 4 is specified by standard EN/ IEC 621963 "Type 3" (DC Combo 2).

In addition, it is possible to have a parallel terminal for charging with method 4, as defined in the CHAdeMO protocol and any other protocol covered by an international or European standard.

Even if there are EV charging adaptors for switching in any kind of connections within the continents, there are not yet any specific directive to be followed by the stakeholders.



## **Required Permits for the licensing-approval process regarding the Installation of Charging Stations in the Greek Territory**

1. For the granting of the licenses for the installation in petrol stations, LPG stations, CNG stations, other liquid fuels and in any combination thereof and in order to approve chargers for electric vehicle batteries with the technical specifications of article 4 of joint ministerial decision 71287/6443/31.12.2014 that are submitted to the relevant Regional Transport and Communications Service, in addition to the supporting documents provided, depending on gas station category, either in article 17 of parliamentary decree 465/1970 (A' 150) and presidential decree 1224/1981 (AD 303), as in force, or in article 25 of parliamentary decree 595/1984 (A' 218), as in force, or in article 12 of the ministerial decision no. 93067/1083 / 20-11-2018 (B' 5661), the following supporting documents:

- a) Solemn declaration of article 8 of law 1599/1986 (A' 75), of the designer of the installation of responsibilities of an engineer, in which it is responsibly stated that for the study of location and installation, inside the service station of liquid and / or gas fuels, of battery chargers of electric vehicles, the mentioned ministerial decision no. 52019 / ΔΤΒΝ1152 / 28-5-2016 (Government Gazette 1426 / B' / 2016) "Adaptation of the Greek legislation to the provisions of Directive 2014/34/ EU of the competent Council and the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to protective equipment and systems intended for use in explosive atmospheres (recast) "(B' 1426). Issue B '2040 / 04.06.2019 GOVERNMENT GAZETTE 23205
  
- b) Plan, in four (4) copies, signed by the engineer, of appropriate scale depending on the size of the installation, which must show both the other building and electromechanical installations of the service station and the locations of the

battery chargers for electric vehicles, in order to ensure their harmonious and safe spatial coexistence and at the same time their smooth and combined operation.

2. For the granting of the licenses for the operation in petrol stations, LPG stations, CNG stations and in any combination thereof, for the installation and operation of electric vehicle battery chargers with the technical specifications referred to the article 4 of joint ministerial decision 71287/6443/31.12.2014 that are submitted to the relevant Regional Transport and Communications Service, in addition to the supporting documents provided, in the case of a gas station category, either in article 18 of parliamentary decree. 465/70 (AD 150) and presidential decree 1224/1981 (AD 303), as in force, or in article 26 of parliamentary decree 595/1984 (AD 218), as in force, or in article 13 of the ministerial decision 93067 / 1083 / 20-11-2018 (B' 5661), the following documents:

a) EU Declaration of Conformity of the manufacturer of the charging device for electric vehicle batteries, in accordance with the requirements of Article 6 of Ministerial Decision No. 52019 / DTBN1152 / 18-5-2016 «Adaptation of Greek legislation to the provisions of Directive 2014/34 / EU of the European Of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to devices and protection systems for use in explosive atmospheres» (B' 1426), if required.

b) EU Declaration of Conformity of the manufacturer of the charging device for electric vehicle batteries in accordance with Article 15 of Joint Ministerial Decision No. 51157 / DTBN1129 / 17-5-2016 «Adaptation of Greek legislation to the Directive 2014/35/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to the availability on the market of electrical equipment intended for use within certain voltage limits» (B' 1425).

c) Solemn declaration of the Installer, delivery Report of the electrical Installation and Inspection Protocol of the electric installation according to ΕΛΟΤ HD 3 84, in accordance with the framework of the ministerial decision Φ.50 / 503/168 / 19-3-2011 (Β' 844), as in force, in the cases of new or existing electrical installations.

d) Proof of notification to ΔΕΔΔΗΕ ΑΕ of the photocopy of the supporting document (c). When during the period of validity of the establishment permit or after the issuance of the operating license of a petrol station, pure gas station (LPG), mixed gas station (LPG) and liquefied petroleum gas station, station of pure compressed natural gas (CNG), or mixed natural gas station gas (CNG), liquefied petroleum gas (LPG) and liquid fuels, in any combination thereof, the installation of battery chargers for electric vehicles with the technical specifications of article 4 hereof is requested, before their installation the following supporting documents are submitted for approval:

- a) The supporting documents (a), (b) of par. 1, b) the supporting documents (a), (b), (c) and (d) of par. 2 of this article.

The approval of the installation of the above devices is granted within fifteen (15) working days from the date of submission of the relevant application. In case the period of fifteen (15) working days expires, without the licensor service approve or reject the request, the above requested change is considered "tacitly" approved and the interested party is considered to have legally installed and operated in the business of his service station, without any additional restrictions. Also, the interested party, in the case of the above tacit approval, can request a relevant certificate from the licensing authority, according to par. 4 of article 10 of law 3230/2004 (Α' 44). In the event that by the end of the fifteen (15) working days, a resubmission of any of the above-mentioned supporting documents, plans and technical report describing the changes is required, the approval of the requested changes is issued within five (5) working days from the

date of resubmission. In the event that either the aforementioned period of fifteen (15) working days, or the five (5) working days expires, without the licensing Service approving or rejecting the request, the interested party is considered to have legally implemented the requested change in the company of its service station, without any additional restrictions. Also, the interested party, in the case of the above tacit approval, can request a relevant certificate from the licensing authority, according to par. 4 of article 10 of law 3230/2004. In case of tacit approval, the licensing authority forwards all supporting documents for inspection to the Department of Fuel and Energy Stations of the Directorate of Technical Inspection and Vehicle Service Facilities of the General Directorate of Vehicles and Facilities of the Ministry of Transport and Information. After the installation of the chargers for the batteries of electric vehicles, in case of a gas station category, a modified, initial establishment or operating license is issued, which includes all the legal installations of the gas station.

3. For the indoor and outdoor car stations waiting for the license (repair workshops for cars, motorcycles and mopeds, as well as public or private K.T.E.O), for the issuance of the Certificate of Legal Operation, in case of installation of chargers for electric batteries with the technical specifications of article 4 hereof, in addition to the supporting documents provided for their establishment, as the case may be, by the respective, for each of the above installations, existing provisions and the following:

a) Plan design, in four (4) copies, signed by the engineer, of appropriate scale depending on the size of the installation, which must show both the other building and electromechanical installations of the car station or workshop or public or private KTEO as well and the mounting locations of the charging devices of the batteries of electric vehicles, in order to ensure their harmonious and safe spatial coexistence and at the same time their good and combined operation.

b) The supporting documents (b), (c) and (d) of par. 2 of this article.

4. For the legally operating car repair and maintenance workshops, the legally operating outdoor and indoor stations of passenger cars, motorcycles and mopeds, as well as for public or private K.T.E.O., the approval of the installation of electric battery chargers vehicles with the technical specifications of article 4 hereof, is carried out in accordance with the plan approval procedure. In particular, the operators of the above-mentioned facilities submit the following for approval to the competent Regional Transport and Communications Service:

a) Plan design, in four (4) copies, signed by the engineer, of appropriate scale depending on the size of the installation, which must show both the other building and electromechanical installations of the car station or workshop or public or private KTEO as well and the mounting locations of the charging devices of the batteries of electric vehicles, in order to ensure their harmonious and safe spatial coexistence and at the same time their good and combined operation.

b) The supporting documents (b), (c) and (d) of par. 2 of this article. The approval of the installation of the chargers for the batteries of electric vehicles with the technical specifications of article 4 hereof, is granted within fifteen (15) working days from the date of submission of the relevant application. In the event that the period of fifteen (15) working days has elapsed, without the licensing Service approving or rejecting the request, the above requested change is considered "tacitly" approved and the interested party is considered to have legally established and operated it in his business, without any additional restrictions. Also, the interested party, in the case of the above tacit approval, may request a relevant certificate from the licensing authority, in accordance with paragraph 4 of article 10 of Law 3230/2004. In the event that by the end of the fifteen (15) working days, the resubmission of any of the above-mentioned supporting documents, plans and the technical report describing the changes is required, the approval of the requested changes is issued within five (5) working days from the date

of resubmission. In the event that either the aforementioned period of fifteen (15) working days, or the five (5) working days expires, without the licensing Service approving or rejecting the request, the interested party is considered to have legally implemented the requested change in the company without any additional restrictions. Also, the interested party, in the case of the above tacit approval, can request a relevant certificate from the licensing authority, according to par. 4 of article 10 of law 3230/2004. In case of tacit approval, the licensing authority forwards all supporting documents for inspection to the Department of Workshops, Car Stations and Other Related Facilities of the Technical Inspection and Vehicle Service Facilities of the General Directorate of Vehicles and Offices. After the implementation of the approved changes, it is issued, in case of a vehicle service installation, modified according to the original Certificate of Legal Operation.

5. In places of parking for passenger cars within the port zone and / or within tourist ports (marinas), for the approval of the installation of the chargers for the batteries of electric vehicles with the technical specifications of article 4 of this decision, are submitted to the competent Regional Service Transport and Communications, in addition to the supporting documents provided in the joint ministerial decision no. 60821/5404 / 30-12-2011 (B' 1/2012) and the following:

Plan design, in four (4) copies, signed by the engineer, of appropriate scale depending on the size of the installation, which must show both the other building and electromechanical installations of the site stopping and parking of passenger cars within a port zone or within tourist ports (marinas) as well as the locations of the charging devices of electric vehicle batteries, in order to ensure their harmonious and safe spatial coexistence and at the same time their good and combined operation,

a) Floor plan, in four (4) copies, signed by the competent engineer, of appropriate scale depending on the size of the installation, in which both the other building and

electromechanical installations of the space must appear stopping and parking of passenger cars within a port zone or within tourist ports (marinas) as well as the locations of the charging devices of electric vehicle batteries, in order to ensure their harmonious and safe spatial coexistence and at the same time their good and combined operation,

b) The supporting documents (b), (c) and (d) of par. 2 of this article. When during the validity of the establishment permit or after the issuance of the permit for the operation of parking space in a port area and / or in tourist ports (marinas) the installation of battery chargers for electric vehicles with the technical specifications referred to in Article 4 of the present, before their installation, the supporting document (a) of this paragraph and the supporting documents (b), (c) and (d) of par. 2 of this article are submitted for approval, with notification to the port administration and operator . The approval of the installation of the chargers for the batteries of electric vehicles with the technical specifications of article 4 hereof is granted within fifteen (15) working days from the date of submission of the relevant application. Upon receipt of the above approval and in order for installation work to take place on the charging devices of the batteries of electric vehicles with the technical specifications of article 4 hereof, it is required to comply with the provisions for execution of works in the land port area where appropriate. In the event that the interval of fifteen (15) without the approval of the licensing Office to approve or reject the request, the above requested change is considered "tacitly" approved and the interested party, after the application of the provisions on the execution of works in the case land port, may install and operate such devices in his business, without any additional restrictions. Also, the interested party, in the case of the above tacit approval, can request a relevant certificate from the licensing authority, according to par. 4 of article 10 of law 3230/2004. In the event that by the end of the fifteen (15) working days, a resubmission of any of the above-mentioned supporting documents, plans and technical report describing the changes is required, the approval of the requested changes is issued within five (5) working days from the date of resubmission. In the event that either the aforementioned period of

fifteen (15) working days, or the five (5) working days expires, without the licensing service approving or rejecting the request, the interested party, after the provisions on the execution of works in the in the case of a land port area, it is deemed to have legally implemented the requested change in its business, without any additional restrictions. Also, the interested party, in the case of the above tacit approval, can request a relevant certificate from the licensing authority, according to par. 4 of article 10 of law 3230/2004. In case of tacit approval, the licensing authority forwards all supporting documents for inspection to the Department of Workshops, Car Stations and Other Related Facilities of the Technical Inspection and Vehicle Service Facilities of the General Directorate of Vehicles and Offices. After the implementation of the approved changes, it is granted, in case of a vehicle service installation, modified according to the original Certificate of Legal Operation, and informs HEDNO SA (ΔΕΔΔΗΕ) accordingly. After the installation of the battery chargers for electric vehicles, a modified operating license is issued, which includes all the legal installations of the parking spaces.

6. In publicly accessible areas (private or public) along the urban, interurban and national road network, as defined in Law 3155/1955 (A' 63) as in force, for the approval of the installation of chargers for electric vehicles with the technical specifications of article 4 hereof, the following are submitted for approval to the service responsible for its maintenance:

a) Plan design, in four (4) copies, signed by the competent engineer, of appropriate scale depending on the size of the installation, in which both the other building and electromechanical installations of the space must appear. Mounting positions of the charging devices of the batteries of electric vehicles, in order to ensure their harmonious and safe spatial coexistence and at the same time their good and combined operation must appear too.



b) The supporting documents (b), (c) and (d) of par. 2 of this article. In the case of installation of chargers for electric vehicle batteries with the technical specifications of article 4 hereof, on a sidewalk of a public road network in an area within a city plan, the maintenance of which does not fall within the competence of the Technical Service of the relevant Municipality for the approval of the facility charging devices for electric vehicle batteries, the consent of the relevant Region is required, which is issued after the submission of the relevant request. For the installation of battery chargers for electric vehicles in appropriately configured points, according to the cases mentioned of par. 2 of article 5, the Concession Company submits for control and approval the supporting documents of this paragraph to the Special Service of Public Works (Ειδική Υπηρεσία Δημοσίων Έργων Κατασκευής και Συντήρησης Συγκοινωνιακών Υποδομών (Ε.Υ.Δ.Ε. Κ.Σ.Σ.Υ.)) for the Construction of Transportation Works with a Concession Contract of the Ministry of Infrastructure and Transport, according to No. ΛΛΕ/ΟΛ/00/07/04/οικ. 4670/11/7/2018 (ΑΔΑ: ΩΛ04465ΧΘΞ-ΡΨΚ) decision of the Minister of Infrastructure and Transport. In case of installation of recharging stations by ΔΕΔΔΗΕ ΑΕ in publicly accessible public areas for recharging of electric vehicles along the urban, interurban and national road network, the requirements of this paragraph and the installation process of fixed network materials is followed.

7. Without prejudice to the decision of par. 3 of article 29 of law 4495/2017 (Α' 167) and the decision of par. 2 of article 30 of law 4495/2017, in parking spaces of public and private buildings except of paragraph 3 of this article, for the installation of publicly accessible charging devices for batteries of electric vehicles with the technical specifications of article 4 of the present, the following are submitted for information of the file to the relevant urban planning service:

a) Plan design, in four (4) copies, signed by the engineer, of appropriate scale depending on the size of the installation, which must show both the other building and electromechanical installations of the parking lot of the building and the placement of

charging devices for electric vehicle batteries, in order to ensure their harmonious and safe spatial coexistence and at the same time their good and combined operation,

b) The supporting documents (b), (c) and (d) of par. 2 of this article,

c) Solemn declaration of good execution of the Supervising Engineer, of which the supporting documents (c) and (d) of par. 2 of this article are notified to the Directorate of Technical Inspection and Vehicle Service Facilities of the General Directorate of Vehicles and Facilities of the Ministry.

8. In parking stations of the terminals or transit stations, for the approval of the installation of batteries for electric vehicles, for approval to the competent service of their Operating Body and for the maintenance of the building and electromechanical installations of the above passenger service stations, the following documents shall be submitted:

a) Plan design, in four (4) copies, signed by the engineer, of appropriate scale depending on the size of the installation, in which both the other building and electromechanical installations of the space must appear parking and mounting locations of chargers for electric vehicle batteries, in order to ensure their harmonious and safe spatial coexistence and at the same time their good and combined operation,

b) The supporting documents (b), (c) and (d) of par. 2 of this article. After the implementation of the approved installation of the charging devices of the batteries of electric vehicles, the above Service issues a Certificate that it has been well executed.

9. Upon approval of the installation of charging devices for batteries of electric vehicles in places other than par. 7 of this article, the Licensing Service has to inform the Directorate of Technical Inspection and Vehicle Service Facilities of the General Directorate of Vehicles and Offices and Transport on the approval of the installation of the battery charging device for electric vehicles, as well as its technical characteristics and location.

## **Legislative Framework for the Regulation of the Electric Vehicle Charging Services Market**

### **Measures for the promotion of e-mobility Market (financial or other)**

#### **Legal Status of Bodies in the Market of electrified vehicles charging services**

The framework for the organization of the e-mobility market and the EV charging infrastructure is defined, both with the modification of the existing framework (based on article 134B of law 4001/2011) and with the introduction of new regulations. In particular, the following are provided:

1. The obligations of the EV Charging Infrastructure Operators (Φ.Ε.Υ.Φ.Η.Ο.) are redefined.
  - a. They are obliged to operate electronic platforms for the supervision and control of charging infrastructures as well as information systems for the management of collected of the information. They also need to adopt remote monitoring methods and control points for charging stations. For publicly accessible

- charging points, the operation is undertaken by Φ.Ε.Υ.Φ.Η.Ο. within one (1) year from their installation.
- b. The obligations and the operation of the Cumulative Representation Bodies of electric vehicles (Φ.Ο.Σ.Ε.Φ.Η.Ο.) are governed by the Regulations of Purchase of Electricity (par. 2 of article 28 of law 4422/2016).
  - c. The same person is allowed to operate simultaneously as an owner of charging infrastructure Φ.Ε.Υ.Φ.Η.Ο. Provider of Electric Services (Π.Υ.Η)
  - d. The obligations and the operating framework of the Π.Υ.Η. and Φ.Δ.Σ. are specified. The Π.Υ.Η. maintain a contractual relationship both with collaborators Φ.Ε.Υ.Φ.Η.Ο. or Φ.Δ.Σ as well as with EV users, based on which the way to charge the charging services, the charging prices and the methods of identification and payment are determined, while they can provide additional services related to the charging.
  - e. The Φ.Δ.Σ. facilitate the exchange of data and the conduct of financial transactions between market participants, through the development and operation of electronic platforms for the exchange of data.
  - f. The supervision of the operation of the electricity market belongs to the Ministry of Environment and Energy in cooperation with the Energy Regulatory Authority (Ρ.Α.Ε.).
  - g. In case of violation of the legal framework for the purchase of electric vehicles, a fine is imposed on the audited entity, which ranges from one thousand (1,000) to fifty thousand (50,000) euros and is collected in accordance with the Κ.Ε.Δ.Ε. (article 12)
- 2.
- a. Individual issues regarding the operation of the electronic Registry of Infrastructure of Electricity Market Operators (Μ.Υ.Φ.Α.Η.) are regulated. Specifically, the persons

liable to the Registry, the registered data and data as well as the required supporting documents are identified.

b. During the initial registration of the market bodies in the Μ.Υ.Φ.Α.Η. a one-time registration fee and an annual maintenance fee are paid. The registration in the Μ.Υ.Φ.Α.Η. is not carried out without the prior payment of the registration fee by the institution, while the non-payment of the maintenance fee entails the deletion of the institution from the Μ.Υ.Φ.Α.Η. In case of violation of this obligation, a fine is imposed, according to the above. (Articles 13 and 14)

3. It is defined that the pricing method, the relevant prices and the charging conditions of the EV users regarding the provision of charging and/or electric services are freely configured.

The obligations of Φ.Ε.Υ.Φ.Η.Ο. and Π.Υ.Η. in relation to the information of the users and the maintenance of the computer identification data, charging and charging per charge are defined. (article 15)

4. a. The development of publicly accessible EV charging infrastructures is carried out as a matter of priority freely, at an initiative of those interested to operate in the market, while it can also be carried out by granting the right to develop, manage and operate these infrastructures.

b. The development of the infrastructure is done on the basis of the National Plan for Electricity, according to the more specific definitions.

c. For the development, management and operation of publicly accessible EV charging infrastructures based on the Electric Vehicle Charging Plans (S.F.H.O.), the municipalities are allowed to conduct open tenders for the granting of this right in places provided in the invitation (expression) of interest.

d. The indicative specifications for the call for expressions of interest for the concession tenders (criteria for evaluating the offers, such as the cost of the provided services, the implementation time, the operational availability of the infrastructure, the general quality of the provided services, etc.) are determined by the competent Service, which carries out the annual evaluation of the development of the EV charging points (level of development in the electricity market, adequacy of infrastructure, etc.).

In case it is not possible to develop an adequate network of publicly accessible EV charging infrastructures through the procedure described above (stakeholder initiative and tender procedures) in relation to the objectives of the National Electricity Plan, the competent Service Secretary is allowed to carry out a transparent and non-discriminatory procedure, for the granting of the right to develop, manage and operate charging points for EV, in geographical units or in areas of poor infrastructure development.

e. Until the elaboration of the Σ.Φ.Η.Ο, the current legislative framework is applied. (Articles 16 and 45)

5. The framework for the preparation of Σ.Φ.Η.Ο. by the local authorities is defined. Particularly:

a. By 31-3-2021, the municipalities of metropolitan centers, the large and medium-sized continental municipalities, the municipalities of capital regional units as well as the large and medium-sized island municipalities, were obliged

to create a Σ.Φ.Η.Ο. with which they plan the location of a sufficient number of normal or high power publicly accessible EV charging points and EV parking spaces within their administrative boundaries. For the other municipalities, the above obligation must have been implemented by 31-3-2022.

- b. The data taken into account for the elaboration of the Σ.Φ.Η.Ο. (urban and traffic characteristics of the area, etc.) and their minimum required content is determined.
  
  - c. It is foreseen that the Σ.Φ.Η.Ο. can be included as a measure of intervention in elaborated strategic plans of the relevant local authorities, such as the Sustainable Urban Mobility Plans - Σ.Β.Α.Κ., the Integrated Spatial Investments - Ο.Χ.Ε., the plans for Sustainable Urban Development - Β.Α.Α. as well as in broader studies and urban regeneration programs.
  
  - d. For publicly accessible infrastructures that do not fall under Σ.Φ.Η.Ο. or until the elaboration of the Σ.Φ.Η.Ο. for the publicly accessible infrastructure that falls under it, the installation of the PC recharging points is carried out in accordance with the existing legal framework.
  
  - e. The Σ.Φ.Η.Ο. are updated by the municipalities at regular intervals [at least every five (5) years], and may be financed from Green Fund resources (Article 17)
- 6.

- a. Special regulations are introduced regarding the location of parking/ parking areas for electric or hybrid electric passenger vehicles for external charging of public use (E.Δ.X. - TAXI) as well as EV for the persons with a disability.
  - b. The way of marking parking spaces and EV charging points is specified, in accordance with the provisions of the Road Traffic Code (K.O.K., law 2696 / 1999). (Articles 18 - 20)
7. The framework of Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010, which refer to e-mobility, are specifically incorporated into Greek legislation, including:
- a. Issues of infrastructure installation are regulating. EV charging in new and existing buildings are regulated, depending on the existing parking spaces and the conditions of use of the buildings.
  - b. Furthermore, it is defined that, in the case of new buildings, the costs incurred for the installation of shared EV charging points are shared proportionally with the owners or occupants who use the charging point, while for existing buildings, the owner or the beneficiary is allowed exclusively to use of parking space, at his own expense, responsibility and care, the installation of cabling infrastructure in his own parking space and the installation and operation of an EV charging point, as specifically defined (Articles 21, 22).
8. The State and the bodies of the Government have to decide the locations to install and operate the charging infrastructures. The locations should be placed where their



services are housed, with a special provision for the buildings of the State and General Government agencies, which are under lease. Until the end of 2022, the State and the Government bodies are also obliged, in their existing buildings, which have more than twenty (20) parking spaces, to install parking spaces with an EV charging point and in each case one (1) at least EV charging point. (Article 23).

9. The conditions for the installation of EV charging points in buildings are determined:
  - a. The works that do not require the issuance of a building permit or the approval of small-scale works (installation or not of a new transformer, etc.) is explained.
  - b. The fire protection measures that must be taken in all cases of installation of EV charging points in closed car parks are explained. In addition to those defined in the current legislation on fire protection of buildings (presidential decree 41/2018).
  - c. The electrical installation specifications of the EV charging points are determined. For the connection and operation of the charging infrastructures of these vehicles, the completion by the owner or the Φ.Ε.Υ.Φ.Η.Ο. of the data in a special form for this purpose, which is posted on the website of Δ.Ε.Δ.Δ.Η.Ε. is required (articles 24 - 27).

10. Issues related to the operation of parking stations, garages and K.T.E.O. are regulated:

- a. It is possible to install chargers batteries for electric vehicles in indoor and outdoor car parks.
- b. The specifications that must be met by the facilities (within which the repair and maintenance workshops of high voltage vehicles operate) are defined and the categories of the technicians of high voltage vehicles for their maintenance and repair are defined.
- c. It is defined that the technical inspection of the EVs (periodic, extraordinary and voluntary) is carried out by the Public and Private Technical Control Centers (K.T.E.O.).
- d. The institutional framework governing the management of EV batteries is clarified (articles 28 - 32).

### **Monitoring mechanism of Publicly Accessible Charging Infrastructures**

There are maps that record in details the location of the charging stations and the different types. The charging cost per kWh is not always available, unless if the user pre-books the charging station. The charging stations of all types can be also seen in the following link: <https://www.plugshare.com/>.

Moreover, there are platforms, like charge that can be used in order to find out the nearest charging station or to discover new ones and pre-book an available one.

In terms of public of public accessible charging infrastructures, there are some municipalities that install charging stations. In some cases these stations are offered free of charge. This tactic promotes e-mobility and bring it closer to the wide public. Regarding the monitoring of the public stations in Greece, there is not yet any dedicated platform.

### **Licensing Process for the SMEs as a Vehicle Charging Service Provider**

For the charging infrastructures of electric vehicles that are installed either in existing buildings that are already electrified paragraph 1 of the article 24 of law 4710/2020 (A 142), or in public areas, the following documents have to be submitted for the case of final connection/initial electrification:

- a) Solemn declaration/ decision of the representative of the body or of the person having the legal right to entrust the management of the application to the Application Administrator
- b) The details of the construction and the geospatial data for its location
- c) The details of the company or the person having the legal right
- d) Solemn declaration of an engineer stating that the electrical installation of the charging points of electric vehicles has been carried out in accordance with the requirements and specifications set out in the Greek Standard ΕΛΟΤ 60364.

- i. For communal infrastructures for charging of the EV that are installed in an existing building according to paragraph 1 of the article 22, law 4710/2020 (A '142), technical report of electrical engineer which includes the operation and the way to use the whole installation is needed.
  
- ii. For charging infrastructures of electric vehicles that are installed in public areas within a residential area, the plan signed by the authorized engineer of appropriate scale (depending on the size of the installation) which shows the electrical installation of charging points of electric vehicles with the corresponding cable infrastructure and supply of electricity to the parking space is needed.