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Alliance of the Producers of Ecological Energy (SPEE-BG)

Centre for Research and Technology Hellas - Hellenic Institute of Transport – GR (CERTH-HIT)

Bulgarian Electric Vehicles Association – BG (BAEPS)

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ABBREVIATIONS

CPO	Charging Points Operators
EVECRI	Electric Vehicles and Charging Crossborders Infrastructure
EV	Electrified Vehicles
EVCS	Electric Vehicles Charging Stations
CS	Charging Stations
SPA	Spatial Planning Act

ABSTRACT

This Report provides detailed description of the variety of regulatory requirements for the installation of charging stations at a government and municipal level in the areas of operation of the EVECRI project in Greece and Bulgaria.

Regulatory requirements in both countries follow similar objectives and patterns and aim to safeguard human safety, customer protection and equitable access to charging as a public service, service reliability, urban aesthetics and space sharing and usability, public parking sharing, respect for market and competition rules and equitable access to the energy infrastructure capacity.

The Greek Laws transcribing European Union Directives and Standards providing legal definitions of different charging stations and respecting technical specifications are described first, followed by the government forecasts and objectives for the charging infrastructure. The third part of the document presents in a similar way Bulgaria's regulations as per National Law and the Ordinances of 41 municipalities in the area of the project. The final section describes Greek and Bulgarian government regulations regarding the market of charging infrastructure and services.

In each country there are currently more than a dozen and growing number of Charging Points Operators (CPOs) so as to conclude that the legal framework is by now well established and does not present obstacles to the growth of the charging infrastructure.

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I. LEGAL FRAMEWORK FOR THE INSTALLATION OF CHARGING STATIONS IN GREECE AND BULGARIA

Overall, charging stations in both countries have to meet the following requirements:

- They shall meet safety standards
- They shall be maintained in good condition
- They shall be made of materials resistant to weather conditions
- They shall not hinder and limit accessibility and passability in the urban environment
- They shall not endanger the safety of traffic at street intersections
- They shall not reduce the visibility or effectiveness of road signs, traffic lights and other means of regulating traffic
- They shall not be placed on the technical infrastructure facilities or easement strips for operation and repair of this infrastructure in a way that violates safety requirements, impedes access to them or creates difficulties for their normal operation
- They shall not be placed on parts of building entrances or in the immediate vicinity of them, as well as in underlying spaces to sidewalks
- They shall not violate the living conditions
- They shall meet the structural, engineering, fire and sanitary standards
- They shall have an aesthetic appearance and correspond to the architectural and artistic environment
- They shall be used for the intended purpose.

II. LEGAL FRAMEWORK FOR THE INSTALLATION OF CHARGING STATION INFRASTRUCTURES IN GREECE (HIT)

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.

2.1. 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.

2.2. 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.

2.3. 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 / Β' / 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 (B' 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 (A' 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 abovementioned 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 (Α' 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. ΑΕ/ΟΛ/00/07/04/οικ. 4670/11/7/2018 (ΑΔΑ: ΩΛ04465ΧΘΞ-ΠΨΚ) 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.

III. LEGAL FRAMEWORK FOR THE INSTALLATION OF CHARGING STATION INFRASTRUCTURES IN BULGARIA (SPEE-BG)

3.1. National legislation and practices for the development of electric mobility (BAEPS)

In the Bulgarian legislation the columns for charging electric vehicles are classified in Section IX of the Spatial Planning Act (SPA). This section determines the order of mobile objects and elements of urban furniture placement.

The mobile objects differ in type and purpose and this has an impact on the order in which they can be placed on land. From paragraphs 2 and 10 of Article 56 of the Spatial Development Act we ascertain that the columns for charging electric vehicles are classified as "mobile objects for administrative, commercial and other service activities".

Paragraph 10 states that the procedure and conditions for the location of such type of mobile objects shall be determined by ordinances under para. 2 of the same article or with ordinances under art. 13a of the same Act.

According to para. 2:

"For the objects under par. 1, items 1 and 2, a permit for installation shall be issued on the basis of a scheme and project documentation, approved by the Chief Architect of the Municipality. The placement scheme determines the spatial location, kind, type, dimensions and purpose of the object under para. 1, items 1 and 2. The conditions and the order for issuing the permit for placement, approval, the scheme requirements and the project documentation are determined by an Ordinance of the Municipal Council, as in the Ordinance, depending on the kind and purpose of the object, a requirement to provide an engineering technical part or a construction statement shall be applied."

Art. 13a states:

"Para. 1: Specific requirements for the appearance of urban spaces, buildings and architectural ensembles may be determined by an Ordinance of the Municipal Council.

„Para. 2 With the Ordinance under par. 1 additional requirements to the volume and content of the detailed development plans and investment projects for new buildings, reconstruction, extension and superstructure and major repairs of buildings and facilities, streets, squares and green areas related to urban development, the protection and preservation of architectural ensembles and the urban environment may be determined."

These texts leave great freedom to local municipal authorities in determining the rules for charging station installations. Therefore, the various Municipal Ordinances in the districts within the scope of the project, which are four in number - Blagoevgrad District, Smolyan District, Kardzhali District, Haskovo District, shall be considered. The districts are divided into forty-one municipalities.

- ⇒ Municipalities in District Blagoevgrad: Municipality Bansko, Municipality Belitsa, Municipality Blagoevgrad, Municipality Gotse Delchev, Municipality Garmen, Municipality Kresna, Municipality Petrich, Municipality Razlog, Municipality Sandanski, Municipality Satovcha, Municipality Simitli, Municipality Strumyani, Municipality Hadjidimovo, Municipality Yakoruda.
- ⇒ Municipalities in Smolyan District: Municipality Banite, Municipality Borino, Municipality Dospat, Municipality Devin, Municipality Zlatograd, Municipality Madan, Municipality Nedelino, Municipality Rudozem, Municipality Chepelare.
- ⇒ Municipalities in District Kardjali: Municipality Ardino, Municipality Djebel, Municipality Kirkovo, Municipality Krumovgrad, Municipality Kardjali, Municipality Momchilgrad, Municipality Chernoochene.
- ⇒ Municipalities in District Haskovo: Municipality Dimitrovgrad, Municipality, Ivaylovgrad, Municipality Lyubimets, Municipality Madjarovo, Municipality Mineralni Bani, Municipality Svilengrad, Municipality Simeonovgrad, Municipality Stambolovo, Municipality Topolovgrad, Municipality Harmanli, Municipality Haskovo.

After a careful analysis of the local regulations, we consider that they are similar in many respects and the procedure for obtaining a permit to place a charging station or mobile object is almost the same. It shall be taken into account that in all municipalities there are two different procedures, which are determined by the ownership of the property on which the future point for charging electric vehicles will be placed. The order is determined depending on whether the property is municipal, state or private.

Some of the regulations also provide additional more detailed conditions regarding the maximum allowable size of mobile objects, but the charging stations for electric cars are small in size and are not supposed to be larger than 3 square meters (which is the maximum allowable size in the Ordinance of the Municipality of Bansko). Areas with a limited regime of movable objects placement are also envisaged. In some cases the situational solution shall be in scale 1: 500 or 1: 200, while other municipalities require a situational solution in scale 1: 700.

The owners of movable objects are obliged to put in a prominent place on the object their name or the name of the company, if owned by a legal entity, as well as the number and date of the issued permit for placement.

Private property:

In order to issue a permit for placing a charging point for electric vehicles in a private property, it is necessary to prepare a sketch by a person with design abilities. This sketch shall be agreed with the electricity supplier company. In some cases, it shall be agreed with the Ministry of Culture in accordance with the terms and conditions of the Cultural Heritage Act, when the station will be placed on a property designated as immovable cultural property. The standpoint is issued by the Minister of Culture or by the National Institute for Immoveable and Cultural Heritage within four

months from the submission of the documentation (Articles 83 and 84 of the Cultural Heritage Act).

The sketch in question and the rest of the project documentation shall be agreed with the Chief Architect of the municipality, who shall approve it.

The following documentation shall be sent to the Chief Architect:

- Application form
Each municipality has prepared an application form, which contains a list of relevant documents available on their websites
The application can be submitted by the owner of the property, together with a document proving the ownership, as well as by the tenant of the property, but with an attached tenant agreement. It can be submitted by another person with the explicit consent of the property owner. When the property is in co-ownership, the owner who submits the application shall provide explicit permission from the co-owners.
In cases where the application is submitted by a tenant, some municipalities provide a shorter period of the permit for movable object placement - 5 or 10 years.
- Sketch from an approved cadastral map or an approved cadastral plan
- Sketch of current regulation plan
- Situational decision

It shall clarify the object location in the plan and the distances to the adjacent regulatory lines, to other mobile objects, advertising elements, limits in the urban environment, approaches, entrances, poles and ramps to adjacent public services or residential objects with permanent development status.

- Architectural design project
- Constructive project
- Installation project
- Photos and other materials proving the adaptation of the mobile object in the urban environment.
- Declaration for the characteristics, issued by the manufacturer on the basis of protocols from the manufacturer and / or certificate of quality management.

The documents shall be approved by the Chief Architect within 14 days of submitting the request according to most of the regulations. It is important to note that some municipalities do not provide a deadline.

Once the documentation has been approved by the Chief Architect, it shall be sent to him again together with the approval to issue a permit and all the documentation specified in the application form for the issuance of a certificate of operation.

State property:

In cases where the station is to be installed on state-owned property, all the above documents shall be submitted to the Chief Architect of the municipality. The difference is that the scheme for placing the charging station shall be approved after consultation with the relevant central administration that manages the property, and in other cases shall be agreed with the Regional Governor.

Municipal property:

The person who has won a tender for conclusion of tenancy agreement for the lease of municipal property, shall submit for approval to the Chief Architect the project for electric cars charging stations installation. For his part, the Chief Architect of the municipality shall issue a visa.

If the official in question issues the visa, the project documentation, which includes the same elements as in the case of private property, shall be submitted for approval and permission to re-install by the Chief Architect of the municipality.

3.2. Technical specifications for electric vehicles charging stations

According to the Energy Act:

„Publicly available charging points operators are parties to electricity transactions as end customers in connection with the services they provide for charging electric vehicles" (Art. 92a).

Charging station operators, as end customers, use the network to which they have joined, publicly known general conditions, which shall contain the following elements:

- „1. Information provided by the transmission system operator or the relevant electricity distribution network;
2. The conditions for termination or interruption of the electricity supply;
3. The conditions for quality and reliability of the supply;
4. The responsibility of the operator in case of unregulated interruption and poor quality supply;
5. Procedure for notifying the customer when making an account adjustment;
6. The types of personal data, which shall be obligatorily processed by the electricity transmission or the respective electricity distribution network operator" (Art. 104a).

According to the same Act, end customers, such as charging station operators, may enter into electricity transactions at freely negotiated prices between the parties (Article 100). Art. 91 refers

to the Rules for electricity trading, which regulate "the relations for charging electric vehicles services provision" (Art. 1 para. 1 item 17 of the Rules).

The second paragraph of the previous article stipulates that end customers, including operators of publicly available chargers, are commercial parties.

Section IV of the Rules stipulates the methods of charging services provision for electric vehicles. According to Art. 31 operators of such stations may provide electric vehicles users with services related to charging this type of vehicle on a contractual basis. The customers of the charging station operators do not enter into "contractual relations with the respective electricity supplier or operator" (Article 31d). For all other issues on this topic, the rules refer to the current Civil Law (Article 31e).

The procedure for connection to the electricity grid for electric vehicles charging points is described in Ordinance 6 for the connection of electricity manufacturers and customers to persons or the electricity distribution networks, issued on 24.02.2014.

According to the regulation in question, customers shall contact their network operator, which is determined by their location. In order to understand the conditions for a customer's object connection, a written request shall be sent to the respective operator in the cases when it is a question of temporary power supply of mobile objects within the meaning of the Spatial Development Act. The request is submitted by the holder of the Mobile Object Placement Permit, and a copy of the permit is attached to the request itself (Art. 4).

If the holder of the permit is a tenant of the area on which the charging column will be placed, he shall also present a notarized consent from the owner (Article 4).

Following the request, the network operator shall provide the connection conditions, which shall include the area technical requirements itself. The maximum time limit for issuing an opinion on the conditions for accession is 14 days from the request submission.

When the request is made for connection to a charging station, no contract with the network operator is concluded and no price is paid when "it is not necessary to design and build connection facilities under the Spatial Development Act" (Article 14, paragraph 3). In case of need for additional connection facilities design and construction, they are paid by the customer according to the operator's price list, approved by the national regulator (paragraph 4).

In order to be connected to the charging point in the above order, it shall be located in a territory, having electrical installations, constructed in accordance with technical standards, and for which a connection contract has already been concluded after fulfilling the network operator conditions under the same Ordinance.

IV. LEGISLATIVE FRAMEWORK FOR THE REGULATION OF THE ELECTRIC VEHICLE CHARGING SERVICES MARKET MEASURES FOR THE PROMOTION OF E-MOBILITY MARKET

4.1. Legal Status of Bodies in the Market of electrified vehicles charging services in Greece (HIT)

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.
 - The Operator of Charging infrastructures (Φ.Ε.Υ.Φ.Η.Ο.) can be any individual business or legal entity registered in the General Commercial Register (Γ.Ε.Μ.Η.), for the purpose of operating infrastructures charging. Φ.Ε.Υ.Φ.Η.Ο. provides recharging services to EV users and is responsible for the proper technical maintenance of charging infrastructures, ensuring the availability and safe operation of recharging points, their supervision and control, as well as providing the necessary information and data to Register of par. 7.

The Φ.Ε.Υ.Φ.Η.Ο is required to operate electronic platforms for the supervision and control of recharging infrastructures and information systems for managing the collected information.

- 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) (This is a specific law for the electricity market. It is a standard in Greek market).
- 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.
 - Π.Υ.Η is the Electric mobility service provider. Π.Υ.Η may provide additional services related to recharging, such as finding available recharging points, navigation and seat reservations, with the aim of optimally serving EV users.
 - Φ.Δ.Σ. is a transaction processing entity that facilitates the exchange of information and the processing of financial transactions between market entities.

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 (P.A.E.).

g. In case of violation of the legislative framework for the electric mobility market, 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 K.E.Δ.E. (article 12)

2. a. Individual issues regarding the operation of the electronic Registry of Infrastructure of Electricity Market Operators (M.Y.Φ.A.H.) 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 M.Y.Φ.A.H. (M.Y.Φ.A.H. is the Register of Infrastructure of e-Mobility Market Operators) a one-time registration fee and an annual maintenance fee are paid. The registration in the M.Y.Φ.A.H. 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 M.Y.Φ.A.H. 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.E.Y.Φ.H.O. and Π.Y.H. 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 nondiscriminatory 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 (Ε.Δ.Χ. - 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 in articles 28 - 32. The specific framework is related to the battery management of the electric vehicles.. Specifically in article 30 is mentioned that the Class-2 High Voltage Vehicle Technician must know how to remove and reinstall the battery in a high voltage vehicle, undertakes the battery repair or recycling process, and has the knowledge and ability to safely put the high voltage system back into service. He has responsibility for all work on high voltage systems and independently carries out work on them, whether live or not.

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 Carge 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 (A142), 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 EAOT 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.

4.2. Legal Status of Bodies in the Market of electrified vehicles charging services in Bulgaria (SPEE-BG)

Legal requirements for the establishment of a company offering services for the maintenance and operation of charging stations for electric cars

Bulgarian legislation does not provide specific requirements for the establishment of a company that offers services for maintenance and operation of charging points for electric vehicles. Charging station operators are considered to be providers of a certain type of service for which no special act is established. As a result, future operators can choose the type of company themselves.

Opportunities for small and medium-sized companies to offer services involving electric vehicles charging

Different service providers, regardless of their size, have the right to provide charging services for electric vehicles. According to Art. 31c of the Rules for electricity trading:

„Charging station operators may provide their customers with services related to electric vehicles charging on a contractual basis, including on behalf of and at the expense of other service providers.“

This means that charging station operators can be intermediaries between end customers and small and medium-sized companies that have chosen to install a charging station for electric cars at the place where they provide their services. In this way, these companies would benefit further from charging their customers' electric cars. The possible additional profit will also be determined by the contractual relationship between the charging point operator and the other type of service provider.