ID and Data Collection for Sustainable fuels in Europe

Report

Deliverable 1.2.1 *Report on resource requirements and organisational/legal form for the IDRO at Member State level*

Deliverable 1.2.2 *National ID registration organisation (IDRO) set up within each participating Member State*

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Activity	1.2 Setup of ID registration organisations (IDRO) at national level within each participating Member State
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List of abbreviations

Abbreviation	Definition
CPO	Charge Point Operator
EC	European Commission
EVSE ID	Electric Vehicle Supply Equipment ID
EMAID	E-Mobility Account Identifier
IDRO	ID Registration Organisation
IDRR	ID Registration Repository
MSP	Mobility Service Provider

List of abbreviations

1 Introduction

To support companies and organisations that need an ID for identifying electric mobility contracts and/or for identifying recharging points, specific organisations are needed that supply and manage these IDs. These so-called ID Registration Organisation (IDRO) are a national responsibility.

This document describes the set-up and organisational mechanisms for IDROs and covers **Deliverable 1.2.1** (Organisation IDRO Member States) and **Deliverable 1.2.2** (National IDRO) from the IDACS project.

The following reports are bases for this document:
- IDACS Terminology v1.0
- PSA IDACS Activity 1.1 Deliverable 1.1.1 and 1.1.2 v2.0

As specified in the PSA IDACS Grant Agreement, in a later phase, the IDROs must be connected to an ID Registration Repository (IDRR) on a European level. This document is focused on the processes and functionalities needed for the set-up of the national IDROs. In addition, this document may also serve in the future as a support guide for Member States that did not participate in the PSA IDACS to set-up their national IDRO.

1.1 Purpose of IDs – IDs only as Identifier

The IDRO issues only IDs for Operators and Service Providers (first 5 Digits), but not for recharging Points (EVSE ID) and contracts (EMAID). The EVSE for recharging points and EMAID for contracts contain the Operator/Provider ID and they are issued by the ID-Owner.They are conceived purely as identifiers. Importantly, they are not meant to contain knowledge (e.g. the operator name) and should not be considered as marketing tools.

Nevertheless, the IDs issued by the IDRO of a Member State are inherently a source of information that might constitute a point of union between governments and the e-mobility market.

1.2 IDRO Framework

The set-up of an IDRO can be split in different components, shown in a summarised manner in the following figure. This document describes each component rigorously in Chapter 2.
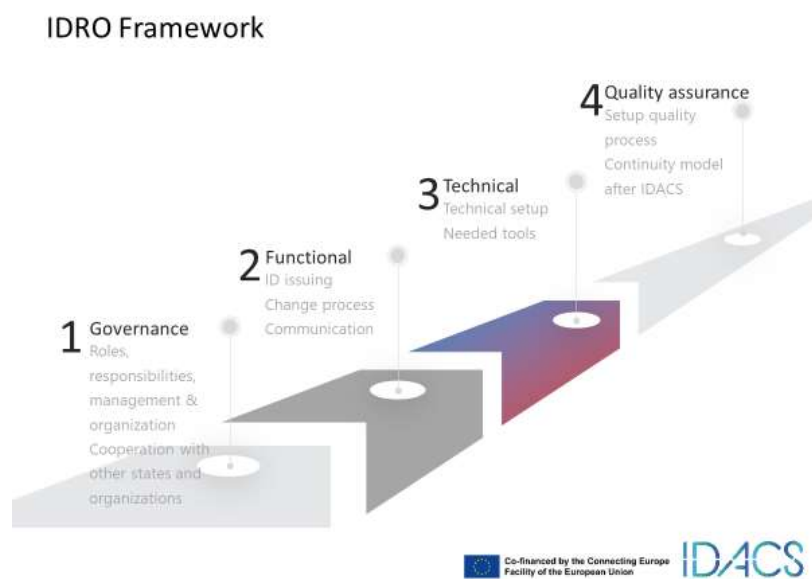

Figure 1: IDRO Framework/components

2 IDRO

The purpose of an ID Registration Organisation is to supply IDs with a national country code for Mobility Service Providers (MSP) and Charge Point Operators (CPO).

According to the standard ISO 15118 '*Road vehicles -- Vehicle to grid communication interface*', each ID starts with a country code. Therefore, the countries are always responsible for issuing these codes. However, there are different implementation schemes, being possible that multiple countries outsource the execution of the IDRO to a common organisation, whilst at the same time keeping the countries responsible and accountable for their (own or outsourced) national IDROs.

2.1 General rules

For submitting and managing IDs there are several general rules that must be taken into account:

1. MSPs and CPOs and/or location owners can request an ID when they have a proven legal entity. A legal entity is defined as a natural or legal person. A location owner is defined as the entity who owns the recharging points to be identified with the ID.
2. A natural or legal person shall request its first ID in the country where they are legally based.
3. A natural or legal person that requests an ID may be legally based in a different country than where the ID is requested.
4. EVSE IDs (IDs for charge points) can be used in other countries, as it is only an identifier. Any laws or regulations that might be applicable can be based on the country location of an EVSE and should not be based on the country code.
5. A natural or legal person can request several IDs.
6. Companies that are both MSP and CPO need 2 IDs: a provider ID for the MSP role and the identification of EV Driver contracts and an operator ID for the CPO role to identify charge points. This can be the same string of characters, as the different purpose of the code is specified via the 'Type character' in the codes. That string of characters must remain unique to the company. An identical ID cannot be given to one MSP and another CPO belonging to different organisations.
7. An ID Registration Organisation may ask a cost covering fee to supply and maintain the codes; this can be a one-time fee and/or time based fee. ID Registration Organizations are free to do this as long as it is clearly mentioned to the applicant of an ID.
8. Provider ID and Operator ID are only valid when published on the website of the ID Registration Organization website. Other IDs may not be used.
9. An ID code cannot be sold or transferred to third parties.

For more background information on the origin of the general rules, please check Annex 1.

2.2 IDRO Governance

This paragraph describes the possible ways to set-up an IDRO and the difference between the Government responsibility and the execution of IDRO activities.
Setting up and maintaining an IDRO is a national responsibility and must be subject to a set of governance principles. This means:
1. There must be a link between IDRO and Government

2. There must be some kind of periodic reporting about the status, functioning and results of the IDRO towards the Government; it is up to the Member States to decide on the exact way of this reporting.
3. How to formalise the set-up this Government responsibility is open:
   a. It can be done via a law or mandate.
   b. It can be done via the set-up of an IDRO foundation or an organisation where the Government is part of.
4. The execution and operation of an IDRO need not necessarily be done by the Government. It can be done by a separate organisation or foundation.
5. The Government must guarantee that there is only one IDRO per country code.

Although there are different ways to manage the link between Government and IDRO, the three that are mainly used are:
   a. Set-up of a separate organisation that is responsible for the IDs via a legal mandate. This organisation can for example be a foundation with several stakeholders in the management board.
   b. Make a department of the Government completely responsible for the management of the IDRO activities.
   c. Via an external organisation that is selected via a tender process and has a mandate from the Government to execute the IDRO activities for a certain period.

2.3   IDRO Functional

From an operational point of view, the following functions must be executed by the IDRO:
1. Offer an application form to request, change or delete an ID, containing at least:
   a. Contact data organization/company: Company name, street, postal code, city, country, address of the company/organisation, Contact person first name, family name, title, function, email-address, phone number, billing address, companies' register number or ZVR-number
   b. A message should be added to announce that the data may be verified. The exact wording is up to the IDRO. Example text: "Please note that your submitted data, VAT number, company address, and company name may be verified. Further, the IDRO may exchange your information with authorities to ensure the correct functioning of the market, intercept fraudulent behavior and illegal activities."
2. Fees for requesting or changing an ID, if any, must be non-discriminatory and transparent.
   Fees are optional, but in the case they apply can consists of:
   a. One-time registration fee
   b. Time based maintenance fee
   c. Change request fee
   In any circumstance, if fees apply, they must be clearly stated on the IDRO website and application form.
3. Set-up a website with an overview of the IDs that are issued by the IDRO
   a. It must be possible for companies to check if a code is available
   b. It can be done via 'simple' overview or via search function
   c. The overview may contain: Company name + ID(s) split for CPO and MSP and Location owners (not for all countries location owners are applicable)
   d. The overview should not contain personal data. Only data like company website and company address should be used.
   e. It must be available to everyone
4. Optional: Providing a possibility to download the overview
   a. The download must at least be in CSV file format
   b. There is no need/must to use DATEX II – this only applies for NAP

a. The reason is that sharing/downloading the data is not required for requesting an ID and downloaded data is not integrated into other systems.
5. Language of documents/website
    a. All information on websites and documents should at least be available in the national language and in English
    b. Other languages are not a must, although websites can easily be translated via several tools
6. Support – how and where organisations can get information about IDs.
    a. At least, contact information e.g. mail address, should be available on website and forms
    b. Name and phone number of contact person or department is very helpful, but not a must
    c. Follow-up of incoming mails and calls should be managed
    d. Information on how to create and use EVSE ID and EMAID should be available on the website.
    e. Information on where to find other IDRO should be on the website
7. Dealing with all that is necessary to know and understand the purpose and use of the delivered ID, and all detailed rules for requesting one and use it.
    a. IDRO and IDRO contact person should understand and be able to explain purpose and use of IDs.
    b. Possibility to add on website and/or for download, additional information about IDs and formats. Or refer to external sources for this information.
8. The IDRO website should provide an overview of the website links of the IDROs active in other member states.
9. On functional and technical level a link must be set-up to the IDRR (ID Registration Repository) when required. This IDRR will act as the EU portal with links to IDROs, facilitating the access to an overview of all submitted IDs in Europe. The exact functions of the IDRR are still to be defined. Deliverable 1.3. of IDACS will deepen on this aspect.

2.4 IDRO Technical

The set-up of an IDRO and its functions also requires a technical set-up. The following aspects should be taken into account on a technical level:
1. Separate from a website with information and ID overview, also an ID register is needed. This can be a complex database or a simple Excel file depending on the number of IDs issued. The higher the number of IDs issued the harder the management using an excel file will become.
2. The website of an IDRO can be set-up in any tool or language. Basic security levels like TLS and/or HTTPS should be implemented.
3. There must be measurements in place to prevent that non-authorized persons or systems can change IDs on website and/or in the register behind it, e.g. avoid a connection between register and website.
4. A technical link to the IDRR must be created– when the IDRR is setup.

2.5 IDRO Quality Assurance Process

To ensure a sustainable long-term ID Registration system and data exchange in Europe, Quality Assurance processes are identified and described in the next chapter.

3   Quality assurance processes

To ensure a long term sustainable and high quality system of international usable ID issuing and maintenance, quality assurance processes need to be in place. This can be split in processes for **daily operations** (§3.1) and a separate **Innovation and Change process** to deal with new developments and possible changes in rules, requirements or ID syntax/format (§3.2). The processes described below can be used as guidelines to draft the specific processes for a national ID Registration Organisation.

3.1   Quality Assurance Process – daily operations

The following figure shows an overview of the processes for the daily operations in a graph.
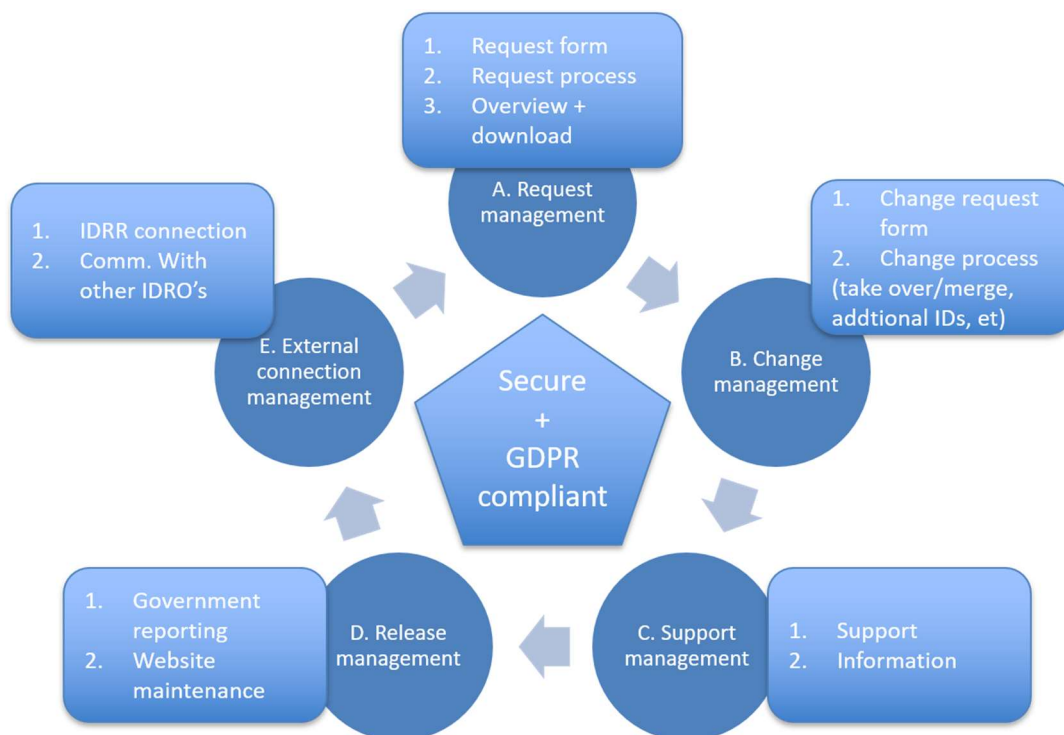

Figure 2: IDRO Quality Assurance Process

The processes are further described in the following paragraphs.

3.1.1   Security and GDPR compliancy

All data that is used must be according to GDPR regulations. This means that requested data is only used for registration and management of IDs and in line with GDPR not used for other purposes. Only the IDs and company contact details will be put on the website of the IDRO and shared with international similar organisations including the European IDRR). No personal data will be shared with others.

The IDRO should ensure that the IDs and information on the website cannot be changed. Although it is purely for informational purposes, it is advised to use at least HTTPS for the website and only distribute PDF files for the registration and change forms.

3.1.2   Registration management

This contains three parts: Registration form, Registration Process and Overview and download possibilities.

3.1.2.1   Registration Form

This is a form which can either be digital (on line) and/or as PDF for download. It should at least contain the following information:
1. Company/Organisation details: Name, address, country etc
2. Website of the company
3. Invoicing details: address, country and, if needed, specific info for e.g. purchase order number
4. Registration info: VAT number, Chamber of Commerce number, etc.
5. Contact details for Business person & Contact details for Technical person
6. Desired ID for specific role (MSP, CPO or Location owner)
7. Info about the cost of the registration
8. Signature of the person requesting it
9. Information must be on the form that the requested data is only used for registration and management of IDs and in line with GDPR not used for other purposes. Only the IDs and company contact details will be put on the website of the IDRO and shared with international similar organisations including the European ID Registration Repository (IDRR).

The website should contain an email address to send the registration form to, unless the registration form is submitted online.
It is also advised to add contact info on the website for additional questions.

3.1.2.2   Registration process

To ensure a good registration, the following procedures should be followed:
1. As companies based in different countries can request an ID, it must be possible to accept signed and scanned registration forms in a digital way
2. Registration forms must be stored digital
3. Following checks should be done:
    a. Are all required fields filled in
    b. In case of an international company, a check must be done if they have already an ID in their main country where they are legally based (see rule 2, chapter 2.1)
    c. Is the required ID acceptable – should not be in contrary to morality (e.g. in combination with country code or the ID itself should not result in swear words)
    d. Does it contain date and signature
4. The ID must be checked on availability in the own national ID register
5. If all OK, confirmation must be sent to the requester
6. If not OK, either additional info must be asked or the requester must be informed that ID request cannot be processed with reason why not.
7. Invoice must be sent to the requesting entity – only after payment the ID is officially approved.

3.1.2.3   Overview and download

To ensure visibility and verification of IDs by other persons and organisations, the IDs must be published:
1. The ID must be placed and published on external visible website with entity name and entity website.
2. The ID with entity name and website must be stored in downloadable overview e.g. a CSV file, which can be downloaded from the website of the IDRO.

3.1.3   Change request management

There are two main reasons for requesting a change related to IDs:
- An entity that already has an ID might want additional IDs, have a need to change some information previously supplied or wants to stop using certain IDs
- Entity is taken over or merging with other organisation which can either result in a change of ownership of IDs or a total stop of using a specific ID.

Above situations must be supported by a change request management process:
1. A form must be available on the website to request a change
2. This form must besides the contact details of the entity also contain the current ID and the requested change, which can either be:
   a. Additional IDs
   b. Removal of IDs
   c. Change of ownership of existing IDs – this should result in a removal at one company and a new request from the new owner, so all right contact details are again available
3. Date and signature
4. The cost of registration must be mentioned
5. Checks should be done on completeness of the form, similar to the ones in the registration process.
6. Forms need to be stored digital
7. If cost of change are involved, invoice must be sent to the entity – only after payment the changes are officially processed.
8. The changes should be processed and made visible on the website and via the downloadable file.

Changing IDs can have considerable impact for the related companies and their customers. It is advised to inform the companies about this.
- IDs are used in roaming agreements between partners – a change of these should also include informing the connecting parties and change of roaming agreements.
- MSP IDs are often used on charge cards/tokens and in apps from EV drivers. When changing or removing IDs this must be taken into account.
- CPO and location owner IDs are often printed on the physical chargers and are used to identify the recharging stations as EVSE IDs. These EVSE IDs are provided by CPOs and location owners through the National Access Points to third parties. When changing these IDs this must be taken into account.

It is the task from the concerning entities to take care of this, but the IDRO should inform about taking the above impacts into account.

3.1.4   Support management

Support management is related to informing entities about the purpose of IDs, the usage and how to obtain them. It is strongly advised to have the following information available on the website:
1. Information about the IDRO, incl. the link to the EU and the national Governmental responsibility
2. The purpose of IDs
3. Explanation how to use IDs
4. Explanation of the format of IDs
5. Information about the cost of registration, time based fees if applicable and cost for changes. Also if it is free of charge, it is advisable to mention.
6. Request and change forms for IDs, including clear overview of the cost of IDs
7. Contact details of your IDRO – at least mail address, but preferable also phone number and contact person or department
8. Link with download possibility to the overview of IDs
9. Link to other IDROs from other countries

10. Information how the IDRO is respecting the GDPR regulations

For usage towards interested external entities, a generic whitepaper should be created which will contain information about: purpose, explanation how to use IDs and the format. This can also be offered as download or direct info on the website.

3.1.5 Release management

The IDROs are a direct responsibility of the national Governments. This requires also reporting to the Governments. As the concrete execution of the IDRO can vary – it can be done by Government department, can be done by external organisation, countries can work together in the execution, etc, the concrete way and frequency of reporting depends on the national situation.

The website and other information must be updated when new IDs are submitted, IDs are changed or when other info is changed.

3.1.6 External connection management

Besides the connection with the national Government, there are two main other connections:
- Other IDROs
- Connection with the IDRR

3.1.6.1 Connection with other IDROs

The agreed type IDs for MSPs & CPOs can be used in different countries. Connection between other IDROs is important because of the following reasons:
- Informing external entities (MSPs, CPOs, etc) about the other IDROs in other countries. Preferable with a link and contact information
  - This requires that if contact info of IDROs are changing the others are informed.
- Exchanging information and experience between IDROs. It is recommended to setup a kind of community of all IDROs and have at least 2 times per year meetings to align and improve processes and share experiences.
- This community can also be lead by the IDRR organisation (see next chapter). However exact role and setup of the IDRR is not yet fully defined.

3.1.6.2 Connection with European ID Registration Repository

As part of the IDACS project a European ID Registration Repository (IDRR) could be set-up. For all kind of parties who want information about IDs or where to obtain them, this IDRR can be used to get information. This IDRR will be a kind of central information portal which will contain at least the following parts:
- General information about IDs
- Information about national IDROs with link to them
- Information about the issued IDs by the IDROs

The ownership, organisational structure of IDRR and what and how the information of the issued IDs are made visible, still needs to be defined. The IDRR will not replace in any case the national IDROs.
The characteristics and set-up of the IDRR will be described in Deliverable 1.3 of the IDACS project.

3.1.6.3   Connection with other stakeholders

Connection with other stakeholders should be part of the activities of the IDRR organisation. These connecting organisations should include, but not be limited to:
- The European Commission (EC)
- Standardization organisations
- eMI3

3.2   Innovation & Change process concerning ID rules, requirements or syntax/format

The EV market is a fast developing and growing market. The market is not yet mature, which results in frequent new insights and visions, based on experience and new developments. This can also have impact on the IDs: the requirements, rules and/or the format. The discussions regarding the ID syntax and format showed that requirements and definitions can change.

It is stated in the definition of the ID syntax that changes of the syntax and format are possible in the future based if there is a need from the market.

In order to facilitate the market regarding IDs and new insights that might result in improvements of the IDs, the IDROs should be open for feedback by the users of IDs and other stakeholders. Collect this information and share it with other IDROs. Changes might also effect the agreed rules and requirements, next to the syntax/format.

The community of IDROs should support these discussions, which can be led by the IDRR organisation – depending on the exact set-up and tasks of the IDRR.

4   Annexes

4.1   Annex 1 - Explanation of the General rules

Below an explanation of the formation and development of the general rules over several meetings and discussions.

1. MSPs and CPOs and/or location owners can request an ID when they have a proven legal entity. A legal entity is defined as a natural or legal person. A location owner is defined as the entity who owns the charge points to be identified with the ID.

> *This general rule was adjusted by Germany and France. It deals with whom can request an ID code.*
>
> *Germany needed the definition of legal entity, because in Germany a natural person can request an ID code. The definition of a legal entity being a natural or legal person originates from the European Energy Directive.*
>
> *France required the inclusion of location owner (more precisely recharging station owner), since in their country it is possible for a location owner to request an ID. This can be useful, when for example a municipality exploits a set of recharging stations, that was put on the market in a public tender, and when due to the end of the contract, another CPO takes over the operation of the charging stations. However, during the Steering Committee this raised the concern that it would now be possible to have more than 1 ID per charging station, if a CPO and a location owner both would apply for an ID code. France, therefore, proposed additional lines, to ensure an unique ID per charge point:*

In order to ensure an unique ID per recharging point and for EV charging contracts the ID Registration Organisation must request the applicant of an ID to specify:
-   The set of recharging points which will be identified with the ID
-   In case of location owner who request the ID: The identity and contact address of the location owner of these recharging points
-   In case of CPO who request the ID: The identity and contact address of the CPO which operates the charge Station
-   In case of MSP who request the ID: The identity and contact address of the MSP who supplies EV recharging contracts

> *However, during the call of 28 January 2021, it was decided to skip these lines, as it would not solve the matter and involve a lot of checks, also because the issue is mainly technical. Back ends of (navigation) systems would resolve the issue immediately.*

2. A natural or legal person shall request its first ID in the country where they are legally based.

> *This rule was included to prevent applicants to request an ID code at a Member State in which the costs for an ID code are less than in their own country.*

3. A natural or legal person that requests an ID may be legally based in a different country than where the ID is requested.

> *This rule was included as for some countries (e.g. Germany) it is necessary to have a local ID code, for example because of technical issues, or regulations. In this case,*

> *an applicant first follows rule 2, and then, if necessary, requests an ID in another country.*

4. EVSE IDs (IDs for recharging points) can be used in other countries, as it is only an identifier. Any laws or regulations that might be applicable can be based on the country location of an EVSE and should not be based on the country code.

> *This rule was included because technically, the ID code is merely an identifier. Therefore, it should not be necessary to apply for another ID code in a different country. Unless, as described in rule 3, the system or regulations require it. However, the local regulations may apply as the country code is not leading for which regulations apply, but the location of the charging station.*

5. A natural or legal person can request several IDs.

> *This rule was included for the Netherlands, as in the Netherlands the current IDRO allowed to have several IDs in use within a company for business management reasons. This does not translate to a charging station having several IDs. When for example, a CPO took over a set of charging stations that previously belonged to another CPO, they requested a different ID code in order to distinguish between the charging stations. Also, in some cases the CPO had several divisions, and used the ID code to distinguish between the charging stations of one division and another. However, as the ID code is merely a identifier, this approach is not recommended.*

6. Companies that are both MSP and CPO need 2 IDs: a provider ID for the MSP role and the identification of EV Driver contracts and an operator ID for the CPO role to identify charge points. This can be the same string of characters, as the different purpose of the code is specified via the 'Type character' in the codes. That string of characters must remain unique to the company. An identical ID cannot be given to one EMP and another CPO belonging to different organisations.

> *This rule shows the functioning of the type character for companies that are both MSP and CPO.*

7. An ID Registration Organisation may ask a cost-covering fee to supply and maintain the codes; this can be a one-time fee and/or time based fee. ID Registration Organisations are free to do this as long as it is clearly mentioned to the applicant of an ID.

> *This rule deals with whether a fee can be requested by an IDRO and the amount of compensation. IDROs usually explain this in their terms of reference.*

8. Provider ID and Operator ID are only valid when published on the website of the IDRO website. Other IDs may not be used.

> *This rule deals with the validity of ID codes. The IDRO publishes an up to date list of which ID codes are currently valid, which can be used by other IDROs and/or the ID Registration Repository for monitoring, or for example to check whether a company has requested its first ID in the country where it is legally based. Also, when there has been a violation by a company, for example when a fee, either an one-time fee or an annual fee has not been paid, the IDRO might not list an ID code anymore as valid.*

9. An ID code cannot be sold or transferred to third parties.

> *This rule was included to prevent fraud, misuse or transfer of ID codes*

4.2   Annex 2 – Overview of current ID Registration Organisations

4.2.1 Austria

The list of IDs
https://www.ladestellen.at

ID request
https://admin.ladestellen.at/#/registrieren

4.2.2 France

The list of IDs
https://www.afirev.fr/en/list-of-assigned-identifiers/

ID request
https://www.afirev.fr/en/request-for-identifier/

4.2.3 Germany

List of Provider IDs
https://bdew-codes.de/Codenumbers/EMobilityId/ProviderIdList

List of EVSE operator IDs
https://bdew-codes.de/Codenumbers/EMobilityId/OperatorIdList

ID Request
https://bdew-codes.de/Codenumbers/EMobilityId/Application?tabIndex=0

4.2.4 Benelux

The list of IDs
ID request | Benelux IDRO (benelux-idro.eu)
ID request
ID-register | Benelux IDRO (benelux-idro.eu)

4.2.5 Poland

ID request
https://eipa.udt.gov.pl/operator/register

4.2.6 United Kingdom

The list of IDs
https://www.realschemes.org.uk/ev-roam

ID Request
https://www.realschemes.org.uk/pdf/ev-roam-id-request-form-2020.pdf

4.2.7 Hungary

The list of IDs
https://idro.hu/en/page/members

ID Request
https://idro.hu/register

4.2.8 Croatia

ID Request

Pametna mobilnost - Registar ID kodova (CRO-IDRO)

4.2.9 Czech Republic
ID Request
idro.rsd.cz

4.2.10 Greece
The list of IDs
Hellenic European ID Registration Organisation (yme.gov.gr)

ID Request
Μητρώο Υποδομών και Φορέων Αγοράς Ηλεκτροκίνησης (yme.gov.gr)

4.2.11 Lithuania
Home - LAKD

4.2.12 Portugal
The list of IDs
3f0f61d7-a579-ca1c-4804-a39d4f2df8bc (mobie.pt)

ID request
IDACS - Mobi.e (mobie.pt)

4.2.13 Slovenia
NAP - National Traffic Management Centre

4.2.14 Spain
Ministry for the Ecological Transition and the Demographic challenge - Energy (energia.gob.es)