

A New Era in Electric Vehicle Charging Services: Draft Amendment to the Charging Service Regulation by EMRA

The Energy Market Regulatory Authority (“EMRA”) has announced that it has submitted a comprehensive draft amendment to the Charging Service Regulation (“**Regulation**”) for public consultation, signalling preparations for a new era that will bring dynamism to the rapidly growing electric vehicle charging sector in Türkiye and enhance service quality for users.

This regulation is of a nature that may introduce changes directly affecting not only charging network operators but also electric vehicle drivers. Indeed, the aim of the regulation is to increase competition in the sector, strengthen infrastructure, and provide users with more flexible, economical, and accessible services.

Key points highlighted in the draft amendment to the Charging Service Regulation (“**Draft Regulation**”) include:

- Transition to a **flexible pricing model** allowing operators to apply discounts at certain locations and times,
- Introduction of **new licensing requirements**, including converting the minimum charging network size from 50 charging units to 150 charging points (sockets) and increasing the geographical coverage requirement to 15 different districts,
- Introduction of an obligation, as of 1 July 2026, for at least one of all DC 50 kW and above units to be added to highways and state roads to have **bank/credit card or cash payment infrastructure**,
- Granting authority to terminate the charging process, upon informing the user, when a **vehicle battery reaches 85% or higher charge** during peak periods, in order to increase station efficiency,
- Imposing obligations on charging network operators to transparently publish their tariffs, reservation fees, and occupancy fees on their websites.

Following the submission of sector opinions to EMRA by the end of business on 26 December 2025, the final form of the regulation is planned to be determined.

You may access the relevant Draft Regulation [here](#).



In this information note, the innovations planned to be introduced by the Draft Regulation and the new era envisaged in charging services are explained in detail under the relevant headings.

I. Mobile Charging Units Are Planned to Be Included Within the Scope of the Regulation

The Draft Regulation indicates that EMRA aims to officially include mobile charging stations within the scope of the Regulation.

With the inclusion of mobile charging stations within the scope, companies holding a charging network operator license will be able to operate mobile charging stations nationwide. It is observed that enabling licensed companies to operate mobile charging stations is planned to offer an accessible alternative, particularly during peak periods and in emergency situations.

II. Transformation in Electric Vehicle Charging Services Is Targeted Through New Definitions Planned to Be Added to the Regulation

With the new definitions planned to be added to Article 3 of the Regulation, it is aimed to officially define new concepts and service

types within the electric vehicle ecosystem and bring them under regulation.

- The official definition and inclusion of **roaming agreements** in the Regulation strengthens the legal basis for users of different operators to easily use other operators' stations. Thus, drivers will be able to access charging stations throughout Türkiye without difficulty, reducing concerns about finding charging opportunities during long journeys or in different cities.
- The definition of **smart charging systems** is of critical importance for managing load on the grid. Through these systems, the amount of energy transferred from the charging unit to the electric vehicle can be adjusted in real time. This regulation is directly related to the flexible pricing (location- and time-based pricing) model included in the draft by EMRA.
- With the definition of **charging point (socket)**, minimum charging network size obligations to be established by charging network operators will be calculated on a charging point (socket) basis rather than charging unit basis.

III. Tightening of Exemption Conditions for Non-Commercial Charging Stations Is Targeted

Through amendments made to Article 5 titled "**Exemptions**" in the Draft Regulation, it is aimed to tighten the exemption conditions provided for privately used, non-commercial charging units.

With the planned amendment, the requirement that such units be used strictly for the user's own needs in order to continue benefiting from the exemption from the



obligation to be connected to a charging network is strengthened on a legal basis.

The aim is to prevent even privately owned charging units from turning into commercial activities, even on a small scale. If a user begins allowing third parties to use such a unit beyond their own needs in return for a certain fee, they may be deemed to have violated the “non-commercial activity” condition and may lose the right to exemption.

IV. Obligation to Publish Information on Licensed Companies in the Official Gazette Is Introduced

The planned amendment to Article 8 of the Regulation aims to strengthen and formalize the method of informing the public about licensed companies. Under the previous version of the Regulation, information such as the trade name, registered trademark, and license term of licensed legal entities was announced only on the EMRA’s website.

With the amendment, these critical details regarding legal entities granted a license by Board decision after fulfilling the relevant obligations will now be published in the



Official Gazette and will additionally continue to be announced on the EMRA’s website. This obligation aims to bring the highest level of formality and transparency to the licensing process.

V. Expansion of the Charging Network Definition and Elevation of Licensing Criteria Are Targeted

The comprehensive amendments included in the Draft Regulation aim both to expand the technological scope of charging networks and to significantly raise the minimum infrastructure standards required for operators in the sector.

With the Draft Regulation, it is observed that the term “charging units” in Article 15, which regulates the physical infrastructure requirements to qualify as a charging network operator, has been replaced with “**charging points (sockets)**”. This change indicates that the physical infrastructure obligations required to qualify as a charging network operator will be assessed based on the number of charging points (sockets).

In addition, it is observed that the minimum number of charging units (now charging points) that a company applying for a license must establish within six months from the effective date of its license has been increased from 50 to 150. Moreover, the geographical coverage requirement has also been increased, making it mandatory for the charging network to consist of charging stations in at least 15 different districts. Existing operators are granted time until **31 December 2026**. This comprehensive step is expected to ensure a more balanced distribution of electric vehicle charging infrastructure across Türkiye and to facilitate

seamless access to charging stations nationwide.

On the other hand, pursuant to additions planned to Article 15, it has been clarified that a charging network does not consist solely of physical stations, but also includes a system that establishes connections between multiple charging stations through software and hardware support. One of the most significant expansions is the inclusion of mobile charging stations within the scope of the charging network. In this way, licensed companies are granted the opportunity to operate mobile charging stations, aiming to offer users a new accessible alternative, particularly during peak periods and emergency situations.



VI. New Rights and Obligations Are Envisaged for License Holders

The amendments planned to be made to Article 16 of the Regulation aim to expand the rights and obligations of licensed companies. The practical consequences of the amendments targeted in the Draft Regulation are as follows:

➤ Opportunity to Enter into Roaming Agreements:

License holders are granted the opportunity to enter into roaming agreements. This enables different charging network operators to directly provide services to each other's users through agreements covering data and payment exchange. Thus, drivers' seamless access to charging stations throughout Türkiye will be facilitated. In addition, license holders will be under an obligation to notify the Authority of the roaming agreements they enter into.

➤ Issuance of Invoices and Collection of Fees:

The authority to issue charging service invoices to users and collect charging service fees from users had not been explicitly regulated in the Regulation. With the Draft Regulation, it is envisaged that the right and authority of operators to issue charging service invoices to users and collect charging service fees from users will be explicitly regulated.

➤ Operation of Mobile Charging Stations:

Companies holding a license are granted the right to operate mobile charging stations.

VII. Regulation of Charging Station Transfers and Mobile Charging Station Operation Procedures Is Targeted

Through additions to be made to Article 17 of the Regulation, it is aimed to standardize charging station transfer transactions. In the event that a charging network operator wishes to transfer a station within its network to another operator, it will be mandatory to submit an application electronically in the format determined by the Authority and to obtain the Authority's approval before the transfer takes place. This regulation can be said to aim at increasing transparency in the transfer of charging stations among licensed companies. In addition, in applications made to the Authority for adding a new station to the charging network, the obligation to submit the document obtained pursuant to the Regulation on Workplace Opening and Operating Licenses, which was mandatory under previous regulations, has been removed from the procedure set forth in this article.

Moreover, with the addition made to Article 17, the application procedures regarding the authority granted to license holders to operate mobile charging stations have been determined. Accordingly, when an operator wishes to operate a mobile charging station, it will submit to EMRA, electronically, a notification containing information such as the province(s) where it will operate, the number of charging units and sockets, and their types and capacities. This notification obligation supports the expansion of mobile charging services while enabling EMRA to monitor the geographical distribution and capacity of this flexible infrastructure.

VIII. Removal of Provisions Related to the Regulation on Workplace Opening and Operating Licenses from the Regulation Is Targeted

With the Draft Regulation, it is aimed to remove all provisions requiring the submission to EMRA of documents obtained pursuant to the Regulation on Workplace Opening and Operating Licenses, which entered into force by the Council of Ministers Decision dated 14/7/2005 and numbered 2005/9207. As a result of these amendments, EMRA will not request any documents pursuant to the Regulation on Workplace Opening and Operating Licenses from operators who will operate charging stations.

IX. Opportunity for Secondary Brand Use at Charging Stations Is Introduced

With the paragraph planned to be added to Article 20 of the Regulation, flexibility regarding brand use at charging stations is planned to be introduced.

Since the main legal entity holding the license is the charging network operator, it is expected that the station will primarily operate under its brand. However, this new paragraph grants the charging station operator that actually operates the station the opportunity to additionally use its own brand together with the brand of the main charging network operator.

Through this regulation, users will be able to see both the licensed main company operating the charging network and the local operator operating the station.

This allows sub-operators that provide services on behalf of a charging network operator under an agreement to gain

commercial advantages by using their own regional or local recognition and brands.

X. Direct Payment Convenience and Smart Meter System Integration on Highways and State Roads Are Targeted

The amendments planned to be made to Article 21 of the Regulation and the new paragraphs planned to be added significantly affect both the technical infrastructure standards of stations and users' payment convenience.

With the amendment made to the fifth paragraph of the article, it has become mandatory for meters used to measure electricity consumption at stations to be compatible with the smart meter system to be installed pursuant to the relevant legislation. This obligation provides a technical basis for more accurate, standardized, and grid-integrated management of consumption data at high-capacity charging stations, enabling efficient use of grid capacity.

On the other hand, the eighth paragraph of Article 21 of the Draft Regulation introduces one of the most critical innovations in terms of user experience. According to this paragraph, as of 1 July 2026, it is mandatory to provide direct payment options via bank/credit card or cash at least one of the DC fast charging units with a power of 50 kW and above located at charging stations newly added to highways and state roads under the responsibility of the General Directorate of Highways.

The practical result of this obligation is that electric vehicle drivers will be able to receive services using direct physical payment methods, without being required to use the

mobile applications of different operators, especially during long journeys. This practice aims to facilitate user access, increase flexibility in charging services, and contribute to seamless access to charging stations across Türkiye.

XI. Provision of Services by Multiple Charging Network Operators at the Same Location Will Become More Common

Paragraph (6) planned to be added to Article 23 of the Regulation allows charging services to be provided simultaneously by more than one charging network operator at the same location.

The most significant result of this practice, which already exists de facto, is that it will pave the way for competition in the sector. The ability of multiple operators to provide services at the same location will encourage competition in terms of price and service quality.

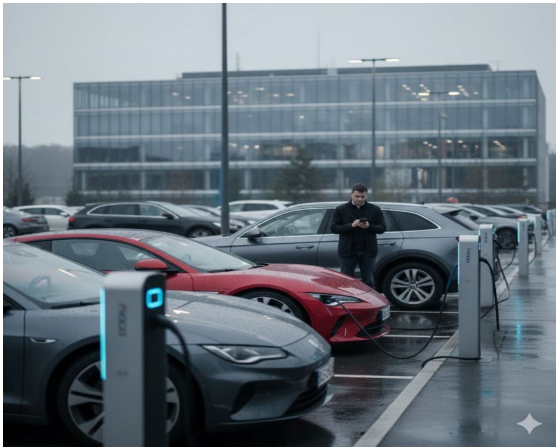
Through this, it is aimed to expand charging services and provide users with more options. In this way, users will have the opportunity to compare the tariffs and services of different operators at a single location and choose the most suitable one for themselves.

XII. Transparency in Charging Service Prices Is Targeted

The amendment planned to be made to Article 25 of the Regulation aims to increase price transparency. According to the planned regulation, charging network operators will be required to simultaneously announce not only charging service prices but also reservation fees and occupancy fees related to this service on their own websites, digital

platforms, and in a manner accessible from charging stations.

Thus, it is aimed for consumers to access more transparent information regarding total costs. Through this regulation, users will be able to see in advance not only charging prices, but also reservation fees paid to reserve a charging point and occupancy fees applied in cases where the station is occupied after the charging process is completed.



XIII. Step to Encourage Competition Through Increased Efficiency and Flexible Pricing in Electric Vehicle Charging Services

With paragraphs (11), (12), and (13) planned to be added to Article 25 of the Regulation, it is aimed to increase efficiency in the use of charging services and encourage competition by providing flexibility in pricing.

a) Efficiency-Oriented Charging Termination (Paragraph 11):

The eleventh paragraph proposed to be added to the article grants charging network operators the authority, particularly during the use of fast charging units, to terminate the charging service of electric vehicles whose battery charge reaches 85% and above, provided that the user is informed. The main

purpose of this practice is to increase station efficiency and ensure more balanced use of electricity grid capacity. This step provides a legal basis for power management practices by helping to reduce waiting times, especially at busy urban stations.

b) Flexible Pricing Opportunity and Rules (Paragraph 12):

The twelfth paragraph proposed to be added to the article provides charging network operators with the opportunity to apply discounted pricing based on location and time of day in order to expand charging services and increase user preference. This flexible pricing model aims to encourage station use during periods of low demand and to connect consumers with more advantageous tariffs. The paragraph states that, in order to ensure pricing transparency, the price applicable at the time the charging service begins will be taken as the basis for the fee charged to the user. In addition, it is mandatory to announce discounted prices and notify the Authority thereof.

c) Prevention of Parking Obstructions in Electric Vehicle Charging Areas (Paragraph 13):

The thirteenth paragraph planned to be added to the same article grants the charging network operator or charging station operator the authority to take necessary measures and make applications/notifications to relevant institutions in order to prevent vehicles from being parked in electric vehicle parking areas in a manner that obstructs the provision of charging services.

XIV. Ensuring Higher Standards in Responding to User Complaints and Service Quality Is Targeted

The comprehensive amendments planned to be made to Article 28 of the Regulation aim to significantly increase charging network operators' service quality and transparency obligations toward consumers. The new version of the article places charging network operators under heavy obligations in two main areas:

- i. Operators are required to establish or procure an ISO 18295-certified call center to provide uninterrupted service 24 hours a day. While ISO 18295 certification ensures that call centers comply with international service quality standards, the 24-hour uninterrupted service obligation ensures that electric vehicle users can receive technical or administrative support at any time.
- ii. Operators are required to provide instant service to all users, whether or not they are party to a loyalty agreement, via their website or mobile application, and to provide users with real-time information on the usage status, availability, and prices of all stations and sockets within the

charging network through their website or mobile application.

Through these regulations, it is aimed to ensure rapid intervention in any technical issues experienced during charging and to protect consumer rights.

XV. Raising Information Security Standards and Introducing an ISO 27001 Obligation Is Targeted

Pursuant to the provision planned to be added to Article 18 of the Regulation, charging network operators are placed under a significant obligation to increase the security of data obtained through their licensed activities. Accordingly, software systems used within the scope of charging service provision are required to be ISO 27001 certified. This obligation aims to prevent unauthorized access to data obtained by operators and to ensure the implementation of information security measures within the framework of internationally recognized standards.

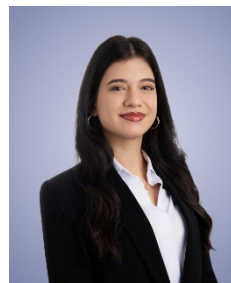
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