


Electrification of transport

European Commission proposal		
Article 33 Ownership of recharging infrastructure	Electricity Directive	✓
Annex V Requirements for alternative measures	EED	✗
Article 8 Requirements on pre-equipment of parking spaces and the installation of EV recharging points in buildings	EPBD	✓
Article 25 Fuel supplier obligation, obligation transfer system and sub-target for advanced biofuels	RED II	✗

The use of electricity is a great opportunity for decarbonisation of transport. Indeed, **electric vehicles (EVs) do not emit CO2 or other pollutants at tailpipe.** Already today, as electricity is increasingly decarbonized, **EVs powered with the current European electricity mix “emit” 50% less CO2 than new internal combustion engine cars.** **Smart charging also allows for a lot of flexibility,** which limits the need to reinforce the electricity grid and helps integrate a higher share of intermittent renewable electricity into the system.

Towards a competitive market for electric vehicle charging infrastructure

EURELECTRIC agrees that the **ownership and operation of charging infrastructure is a market activity.** DSOs should be allowed to own, develop, manage or operate it for a limited time and under certain conditions. It should be clarified that DSOs can recover their costs, once their activity is phased out.

Energy savings in transport must be encouraged, not hampered

Transport represents an important area for energy efficiency. EURELECTRIC therefore welcomes the fact **that energy savings in transport can count towards the energy efficiency obligations.** EVs are 3 to 4 times more energy efficient than Internal Combustion Engine (ICE) vehicles. **The replacement of an ICE vehicle by an EV should be credited and recognized** even if the replacement takes place at the end of the lifetime of the vehicle. The provision of charging infrastructure is crucial for the uptake of electromobility and thus needs to continue to be credited against the obligation.

Recharging infrastructure is key for electricity vehicles market penetration/integration

EURELECTRIC welcomes the Commission’s initiative to address the need for electric vehicle recharging infrastructure in both residential and non-residential buildings. This is crucial to speed up the market penetration of electric vehicles and thereby the decarbonisation of the road transport sector. **Pre-cabling or pre-tubing is a cost-effective measure to ensure easy installation of charging points** at a later point in time and should therefore be extended to non-residential buildings. **Every EV owner should have the right to install a charging point in a co-owned building.** Approval procedures have to be simplified accordingly.

Renewable electricity must be put at equal footing with other renewable transport fuels

The obligation to offer advanced biofuels should not apply to operators of electric vehicle charging infrastructure. As for other renewable transport fuels, renewable electricity used in all transport sectors should be counted towards the fuel supplier obligation. Furthermore, the calculation of renewable electricity needs to be streamlined.

Selection of key amendments

Annex V – Article 3h

the activities of the participating party, entrusted party or implementing public authority are ~~shown to have caused~~ **demonstrably material** to the achievement of the claimed savings

EED

Justification

Direct causality is better, as it might not always be possible to “show” the achievements. For example, the installation of charging infrastructure for electric vehicles is central to the uptake for electric vehicles, which are about 3 times more efficient than internal combustion engine (ICE) vehicles. However, it is impossible to show that the installation on one specific charging station has caused a certain number of vehicle owners to replace their ICE vehicle with an electric one. Therefore, EURELECTRIC proposes to revert to the wording of the current Directive and state that the party’s activities must be “demonstrably material” to the achieved savings.

Article 8 (2)

Member States shall ensure that in all new non-residential buildings and in all existing non-residential buildings undergoing major renovation, **insofar as the renovation measures include the electric infrastructure or the car park**, with more than ten parking spaces, at least one of every ten is equipped with a recharging point within the meaning of Directive 2014/94/EU on the deployment of alternative fuels infrastructure, **and** which is capable of ~~starting and stopping charging in reaction to price signals~~ **dynamically modulating the charging process in reaction to price or load signals**. This requirement shall apply to all non-residential buildings, with more than ten parking spaces, as of 1 January 2025, **unless Member States show that this is not feasible. In any case, Member States shall ensure a « right to install a charging point » for tenants and co-owners. In all new non-residential buildings and in all existing non-residential buildings undergoing major renovation, insofar as the renovation measures include the electric infrastructure or the car park, with more than ten parking spaces, every parking space should be equipped with conduits allowing for the later installation of any standard normal power recharging point.**

EPBD

Justification

So-called smart charging is important for a reliable and cost-effective integration of electric vehicles with the electricity system. While Member States might need some flexibility for the equipment of existing non-residential buildings with recharging points, a “right to install a recharging point” can ensure that no citizen or company is prevented from switching to electrically propelled vehicles by the pure unavailability of a recharging point.

Article 25 (1)

The minimum share shall be at least equal to 1.5% in 2021, increasing up to at least 6.8% in 2030, following the trajectory set out in part B of Annex X. ~~Within this total share, the contribution of advanced biofuels and biogas produced from feedstock listed in part A of Annex IX shall be at least 0.5% of the transport fuels supplied for consumption or use on the market as of 1 January 2021, increasing up to at least 3.6% by 2030, following the trajectory set out in part C of Annex X.~~

RES II

Justification

EURELECTRIC advocates for a technology neutral approach without sub-targets. In case the sub-target for advanced biofuels is kept, suppliers of electricity to the transport sector should be exempted from the obligation to offer advanced biofuels.