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Public consultation concerning the Revision of the Directive 2014/94/EC on the Deployment of Alternative Fuels Infrastructure (AFID)

A Eurelectric response paper

June 2020

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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WG E-mobility

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Fields marked with * are mandatory.

Introduction

Following the policy ambition set out by the European Green Deal for the EU to become a climate neutral economy by 2050, transport emissions have to decrease by 90% by that year. Fuels decarbonisation and the deployment of adequate alternative fuels infrastructure are key necessities in this context. Forecasts foresee a strong increase of market uptake, particularly of alternative fuels road vehicles, post 2020. Recharging and refuelling infrastructure needs to be ready to meet the demand for sustainable alternative fuels in all modes of transport. A lack of interoperable, easy-to-use infrastructure for recharging and refuelling those vehicles, and vessels, should not become a barrier and slow-down market uptake.

An uncoordinated introduction of alternative fuels infrastructure policies in the Member States can lead to fragmentation of market action and a lack of security for long-term public and private investment in vehicle and fuel technologies. Directive 2014/94/EU on deployment of alternative fuels infrastructure (AFID) was adopted in 2014 to ensure a common framework of measures for the deployment of alternative fuels infrastructure in Member States. The central means are national policy frameworks that Member States had to adopt in 2016. Moreover, the Directive sets technical specifications for the interoperability of infrastructure. However, alternative fuels infrastructure is not available evenly across the EU. Member States' national policy frameworks under Directive 2014/94/EU show, on average, a lack of ambition to ensure adequate rollout and easy cross-border usability in the critical period post 2020.

The European Commission is inviting the public and stakeholders to express their opinion and share information on the impact of the existing Directive as well as on possible measures and potential impacts of its revision. Information received in this consultation will support the evaluation and the Impact Assessment that the European Commission is currently carrying out. Respondents are welcome to expand on their answers in the text boxes foreseen for this purpose. At the end of the questionnaire, it is also possible to upload supporting evidence documents to complement the contribution.

About you

*Language of my contribution

English

*I am giving my contribution as

Business association

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*Organisation name

255 character(s) maximum

Eurelectric (the Union of the Electricity industry)

*Organisation size

Small (10 to 49 employees)

Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register (http://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en). It's a voluntary database for organisations seeking to influence EU decision-making.

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Belgium

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Citizens experience with Alternative Fuels Infrastructure

1. Do you own or regularly drive an alternatively fueled vehicle?

- ○ Yes, an electric car
- ○ Yes, a vehicle running on natural gas
- ◉ Yes, other (please specify)
- ○ No

Please specify

Individual Eurelectric member companies have largely started implementing strategies for electrifying their fleets -- a trend that needs to be strongly taken into consideration within policy-makers' decisions.

2. Do you have difficulties finding alternative fuels infrastructure to recharge/refuel your vehicle?

- ○ Yes, on a regular basis
- ○ Sometimes
- ○ Seldom
- ○ Never
- ○ No opinion

3. In case you have difficulties finding recharging/refueling infrastructure, what are the main underlying problems?

- ☐ There is not sufficient infrastructure in urban areas
- ☐ There is not sufficient infrastructure along highways and other large interurban roads
- ☐ There is not sufficient infrastructure in rural areas
- ☐ Even if there is infrastructure, I have trouble identifying where they are located
- ☐ Other (please specify)

Please specify

4. In case you do not own an alternatively fueled vehicle, would you buy one, if you were certain that there was sufficient recharging or refueling infrastructure available?

- ○ Yes
- ○ Maybe
- ○ No, the price for alternatively fueled vehicles is too high
- ○ No, the technology is not yet mature
- ○ No, the vehicles on the market are not attractive enough

Questions 5 – 9 concern electro-mobility only

5. When you recharge your electric-vehicle, do you feel well informed in advance on the price you will have to pay for the charging service?

- ○ Yes, on a regular basis
- ○ Sometimes
- ○ Seldom
- ○ Never
- ○ I don't know

6. The directive already requires that users can pay ad hoc at the recharging point. However, in practice, many different payment options have developed throughout Europe. How often do you face difficulties when trying to pay?

- On a regular basis
- Sometimes
- Seldom
- Never
- I don't know

7. If you believe that a common payment method should be available at all publicly accessible recharging points, please indicate which payment option should be available?

- Cash Payment (coins / cash payment terminal)
- Payment by debit card / credit card (card payment terminal or contactless payment)
- Payment by Smartphone / Banking App without the need to download a specific app from the operator of that recharging-point
- Payment by specific app from the operator of that recharging-point
- Other (please specify)
- There is no need for a common payment method

8. Do you believe that roaming (payment through the user's electro-mobility service provider) should be available at every publicly accessible recharging point?

- Yes
- No
- I don't know

9. Do you have any general comment on using alternative fuels infrastructure that you would like to share?

500 character(s) maximum

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Anonymised user data about driving and charging behaviour suggests that
currently 20% of charging processes take place on a publicly available charger,
while the rest occur at home (40%) and at work (40%). This trend is expected to
remain the same throughout the next decade, which also raises the importance of
understanding the availability (not regulation) of private charging points.
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The following questions of the consultation are open to all participants, but address particularly expert views and require more detailed and technical input.

General assessment of the Directive's relevance and scope (questions related to the evaluation)

The Alternative Fuels Infrastructure Directive aims at a coordinated approach for the roll out of alternative fuels infrastructure in Member States by means of setting obligatory requirements for the development of national policy frameworks. Member States had to outline national targets, objectives and supporting actions for the deployment of such infrastructure that should be coordinated and coherent at EU level. Common technical specifications adopted under that Directive should support this approach.

1. In your view, how relevant is a policy on alternative fuels infrastructure at EU level as established by the Alternative Fuel Infrastructure Directive to support the uptake of alternative fuels?

- (●) Very relevant
- ( ) Relevant
- ( ) Less relevant
- ( ) Not relevant
- ( ) No opinion

2. Currently, the Directive covers electricity, hydrogen, biofuels, synthetic and parafinic fuels, compressed natural gas (CNG), liquefied natural gas (LNG) and liquefied petroleum gas (LPG) as main alternative transport fuels. In your view, is this scope still appropriate in the context of the long-term objective of the European Green Deal to reduce transport emissions by 90% by 2050?

- ( ) It is fully appropriate
- ( ) It is appropriate
- ( ) It is rather not appropriate
- (●) It is not appropriate
- ( ) No opinion

In case you answered "It is rather not appropriate" or "It is not appropriate", can you please indicate why?

- [ ] Some fuels are missing (please specify)
- [x] Some fuels are not relevant anymore (please specify)
- [x] Other (please specify)

Please specify "Some fuels are not relevant anymore"

The definition of 'alternative fuel' in Directive 2014/94/EU is not fit-for-purpose and does not fully support decarbonisation in the transport sector. Eurelectric proposes new and separate 'sustainable fuels' definitions for light and heavy-duty vehicles as well as maritime (reflecting the market maturity in each segment) that would address the required levels of ambition under the Green Deal and the assessment by the European Commission on achieving climate neutrality. Classifying fossil fuels as a clean alternative in Article 2 of the Directive is not acceptable in view of the Green Deal objectives and the definition should prioritise zero-emission sources.

Recent European Commission decisions on State aid have further asserted that measures incentivising electric mobility contribute to the Green Deal goals and at the same time outweigh any potential distortion of competition they could lead to. In this sense, the European Commission should display greater assertiveness in policy making in addition to such ad-hoc decisions.

What's more, the recently revised Clean Vehicles Directive (CVD) links with AFID. The CVD defines light-duty vehicles (LDV) in terms of tailpipe emissions expressed in CO2 g/km and for heavy-duty vehicles (HDV) refers to the definition set in AFID. More specifically, the 50 grams per kilometre definition for LDVs has been accepted as the benchmark for zero-and low-emission vehicles in the CO2 emissions performance standards post-2020.This benchmark was further reasserted in the EU's green finance taxonomy, whose technical annex also defines low-emission vehicles as those with tailpipe emissions of 50g CO2/km or less by 2025 and 0g CO2/km from 2026 onwards.

To avoid a negative domino effect, Eurelectric proposes a consistent approach in legislation and amended list of sustainable fuels for light-duty vehicles which answers the significantly greater need to invest in zero-emission solutions. This would also reflect the market maturity for passenger cars. Increased attention and political support is at the same time needed for buses and trucks charging infrastructure to attain the desired decarbonisation efforts for these vehicle segments.

Please specify "Other"

A dedicated piece of legislation to electric vehicle charging infrastructure could make more sense in light of the recent market developments and related questions and opportunities to this specific segment.

3. Currently the Alternative Fuel Infrastructure Directive covers alternative fuels infrastructure for road and shipping. In your view, is this appropriate?

- [x] the Directive should also cover rail infrastructure
- [x] the Directive should also cover airport infrastructure for ground movements (e.g. vehicles for transport of passenger or for supporting taxying of aircraft etc.)
- [ ] Other (please specify)
- [ ] the Directive already covers all relevant transport modes
- [ ] No opinion

4. The Alternative Fuels Infrastructure Directive currently requires from Member States to establish "National Policy Frameworks" (NPFs). Within this framework, Member States have to develop targets and objectives for the deployment of alternative fuels infrastructure, based on an assessment by the Member

States of national, regional or EU-wide demand. In your view, are the NPFs the right instrument to ensure the development of a coherent infrastructure network throughout the EU?

- ○ They are the right policy instrument
- ○ They are the right instrument but the provisions in the directive are not prescriptive enough to avoid diverging interpretation and application by Member States. The provisions in the directive should therefore be strengthened
- ◉ They are only partly sufficient. Additional/complementary instruments would be needed to avoid diverging interpretation and application by Member States
- ○ They are not the right instrument because they are not sufficiently stringent. Therefore they should be replaced by alternative, more stringent instruments
- ○ They are not the right instrument and should be abandoned without being replaced by alternative instruments
- ○ No opinion

Please explain briefly your answer in particular what additional/complementary/alternative instruments you would suggest.

500 character(s) maximum

Legislation should take into consideration expected vehicle sales, their charging capacities, the power classes of charging points and locations. This would require a dynamic methodological model which at the same time allows MS some flexibility in determining how to establish public charging infrastructure sufficiency, based on the number of vehicles on the road and amount of power delivered. Need for more specific requirements regarding NPF content, structure and revision (TEN-T context)

5. Currently the Alternative Fuel Infrastructure Directive addresses publicly accessible fuels infrastructure only. Should it also address infrastructure not accessible to the public?

- ○ It should cover all infrastructure, publicly accessible and not publicly accessible
- ○ It should cover publicly accessible infrastructure only, with distinction required between public infrastructure on public grounds and publicly accessible infrastructure on private grounds (“Semi public” infrastructure)
- ○ The current scope (publicly accessible fuels infrastructure only) is fine
- ◉ Other (please specify)
- ○ No opinion

Please specify

Legislation should cover publicly accessible infrastructure only, with distinction required between public infrastructure on public grounds and publicly accessible infrastructure on private grounds ("Semi public" infrastructure).

This being said, private charging infrastructure should be taken into account, since approx. 80-85% of the charging processes currently take place privately at home or at work.

However, at private grounds with private access, each Member State may experience very distinct situations, to which European regulation may end up being ineffective or eventually detrimental to foster/support the deployment.

The European Commission should set dedicated minimal requirements for semi-public infrastructure to support interoperability without discouraging private investments. In addition, the Commission should address the remaining obstacles to non-public charging points to ensure an effective and need-based right-to-plug. From a user perspective, charging at home/office is a strong prerequisite service for an efficient roll-out of EVs.

Important to ensure consistency with the regulations of the Energy Performance of Buildings Directive (EPBD) and the expected levels of fleet electrification that would require setting the right conditions for placing chargers in the context of buildings. Opportunities to improve EPBD's transposition into national law have to be incentivised.

6. The Alternative Fuels Infrastructure Directive currently requires from Member States to ensure that relevant, consistent and clear information is made available to consumers/users as regards those motor vehicles which are fueled with alternative fuels. Such information has to be made available in motor vehicle manuals, at refueling and recharging points, on motor vehicles and in motor vehicle dealerships in their territory (Article 7). In your view, are the current provisions in AFID effective in ensuring that consumers/users receive relevant, consistent and clear information on the compatibility of their vehicle engine/model with the alternative fuels/recharging options available at each refueling/recharging point?

- ○ These provisions in the directive are effective
- ◉ These provisions in the directive are only partly or not at all effective and additional/complementary provisions are needed
- ○ The directive is not the right instrument and corresponding provisions should be replaced by more effective instrument(s)
- ○ The directive is not the right instrument and corresponding provisions should be abandoned without being replaced by alternative instruments
- ○ No opinion

Please explain briefly your answer.

500 character(s) maximum

Improved information availability and facilitating easy access and use of infrastructure across Europe.

Key to keep in mind that vehicles capabilities can be altered through software updates. The information should be provided by OEMs who own the responsibility about the vehicle specifications. The charging stations work only with the known vehicles capability.

Main problems

1. A rapid uptake of alternatively fuelled vehicles and vessels is expected in the next decade. For example, the European Green Deal considers it likely that by 2025 around 13 million zero and low emission vehicles will circulate on roads. In your view, are the National Policy Frameworks the adequate instrument to ensure that a sufficient number of publicly accessible infrastructure will be deployed over the next decade?

	Fully adequate	Adequate	Rather not adequate	Not adequate	I don't know
Electric rechargers for cars and light duty vehicles in urban/suburban agglomerations	○	○	◉	○	○
Electric rechargers for cars and light duty vehicles along the main highways	○	○	◉	○	○
Electric rechargers for trucks / heavy duty vehicles in urban/suburban agglomerations	○	○	◉	○	○
Electric rechargers for trucks / heavy duty vehicles along the main highways	○	○	◉	○	○
Electric rechargers for busses	○	○	◉	○	○
CNG refuelling stations in urban/suburban agglomerations	○	○	◉	○	○
CNG refuelling stations along the main highways	○	○	◉	○	○
LNG refuelling stations at maritime ports	○	○	◉	○	○
LNG refuelling stations at inland ports	○	○	◉	○	○
LNG refuelling stations along the main highways	○	○	◉	○	○
Hydrogen refuelling stations in urban/suburban agglomerations	○	○	◉	○	○
Hydrogen refuelling stations along the main highways	○	○	◉	○	○
On Shore Power Supply in inland waterway ports	○	○	◉	○	○
On Shore Power Supply in maritime ports	○	○	◉	○	○

2. In your opinion, do users of electric vehicles face problems when it comes to payments when charging their vehicles at re-charging points operated by an entity with which the user does not have a contract?

- ○ Yes, frequently
- ◉ Sometimes
- ○ Seldom
- ○ Never
- ○ I don't know

3. In your view and experience, is the information that is currently provided on location, availability, etc. of re-charging and re-fuelling points sufficient to cover the needs of the user?

- ○ Information to users is fully sufficient
- ◉ Information to users is largely sufficient
- ○ Information to users is rather insufficient
- ○ Information to users is insufficient
- ○ I don't know

4. The Commission assessment of the national policy frameworks developed under the Directive shows a variety of approaches to setting targets, objectives and supportive actions. Please indicate to what extent do you agree with the following observations?

	Fully agree	Largely agree	Rather disagree	Completely disagree	No opinion
"There is uneven and insufficient deployment of alternative fuels infrastructure within a Member State because the Directive does not specify in sufficient detail the requirements for the roll out of alternative fuels infrastructure, with respect to the required number and technical requirements."	○	◉	○	○	○
"There is uneven and insufficient deployment of alternative fuels infrastructure across Member States because the Directive does not ensure that Member States cooperate with stakeholders and with other Member States to deliver a sufficiently dense and interoperable network throughout the EU."	○	◉	○	○	○
"Users cannot easily recharge or refuel their vehicles/vessels throughout the EU because the directive does not ensure a uniform approach towards the use of alternative fuel infrastructure and subsequent payments."	○	○	◉	○	○

5. In your view, are there are other causes of the limited impact of the Directive? Please explain.

1,000 character(s) maximum

Inadequate methodology/model for understanding sufficient deployment of the charging network. It should take into account different parameters such as expected vehicle sales, charging power classes, vehicles' charging capacity, locations (including understanding the developments in private locations) drivers' behaviour, battery technology developments, etc.

Stronger synergies with TEN-T in the context of Core and Comprehensive networks

Extremely limited consultation with local actors.

Lack of differentiation between requirements as well as market reality for different vehicle segments

The Directive should also include equipment and services and harmonize communication towards drivers such as clear signals to customers about stations availability for example.

6. Are there other aspects you would like to underline regarding the functioning and/or impact of Directive 2014/94/EU? Are there issues that could be simplified?

1,000 character(s) maximum

The implementation of the Directive should not leave space for lack of harmonization across the EU. Lack of consequences for Member States when Directive is not applied (e.g. in some countries it is still not possible to have ad hoc payment in any public electric charging point)

The example of the possibility to impose a mechanical shutter on AC station has created a market exception in one member state. Through this obligation, the European consumer has a limited choice of charging stations available. Indeed the obligation of having a shutter on the charging station prevents the possibility to opt for a cable attached station (for which a shutter is not necessary).

For the successful expansion of electromobility, a flexible and dynamic expansion framework for the charging infrastructure is recommended, based on requirements, vehicle inventory and technology, demographic distribution and individual vehicle use.

Policies

This section aims at identifying potential policy measures to overcome identified problems related to the uptake of alternative fuels.

1. In your opinion, how important is it to revise the following parts of the Alternative Fuels Infrastructure Directive?

	Very important	Important	Less important	Not important	I don't know
Scope with respect to fuels addressed in the directive	○	◉	○	○	○

Scope with respect to transport modes addressed in the directive	○	○	◉	○	○
Provisions on ensuring an appropriate infrastructure coverage	◉	○	○	○	○
Provisions on monitoring and reporting	○	◉	○	○	○
Provisions on interoperability and user information	○	◉	○	○	○
Provisions on technical specifications	○	◉	○	○	○
Provisions on market access	○	◉	○	○	○
Provisions on interlinkages between the electric vehicles and their infrastructure and electricity markets	○	◉	○	○	○

Targets to achieve a coherent network

2. Right now, Member States are obliged to establish targets for the roll out of alternative fuels infrastructure through their national policy frameworks. However, those national targets are being set without using a common methodology. In your view, how useful are mandatory deployment targets for Member States that are derived by using a common methodology to ensure a coherent minimum alternative fuels infrastructure roll out in the following areas:

	Very useful	Useful	Less useful	Not useful	No opinion
Electricity for cars & vans	○	◉	○	○	○
Electricity for heavy duty vehicles	○	◉	○	○	○
Electricity for busses	○	◉	○	○	○
Electricity for inland waterway	○	◉	○	○	○
Electricity for short-sea shipping	○	◉	○	○	○
Hydrogen for cars & vans	○	○	○	◉	○
Hydrogen for heavy duty vehicles	○	○	◉	○	○
Hydrogen for inland waterway	○	○	◉	○	○
Hydrogen for short-sea shipping	○	○	◉	○	○
CNG for cars & vans	○	○	○	◉	○
LNG for heavy duty vehicles	○	○	○	◉	○
LNG for inland navigation	○	○	○	◉	○
LNG for maritime vessels	○	○	○	◉	○
On shore power supply at inland waterway ports	○	◉	○	○	○

On shore power supply at maritime ports	○	◉	○	○	○
Hydrogen for rail	○	○	◉	○	○
Electricity for aviation ground movement	○	◉	○	○	○
Electricity for port service provisions (pilotage, towage, cargo handling equipment)	○	◉	○	○	○

Please explain your answer.

1,000 character(s) maximum

"Common methodology" is a positive point but since the focus is rather on mandatory targets, we present a comprehensive answer below related to provisions for charging infrastructure planning:

Experience in our sector shows that fixed targets (e.g. using the ratio 1 to 10) usually do not represent customer requirements or user behaviour and situations differ across regions and locations.

Instead, legislation should require to take into consideration expected vehicle sales, their charging capacities, the power classes of charging points and locations. This would require a dynamic methodological model which at the same time allows Member States some flexibility in determining how to establish public charging infrastructure sufficiency, based on the number of vehicles on the road and amount of power delivered.

Government plans and requirements would be useful when complemented with dedicated funding as a part of a larger strategy to deploy battery electric vehicles in particular.

Reply to questions 3-10 only in case you believe that mandatory deployment targets are useful for at least some of the above mentioned areas.

3. In your view, should such mandatory targets be applicable throughout the whole transport network or only for specific parts of it?

- ○ Applicable to the TEN-T core network (including the most important transport connections and nodes in the EU represented by the core network corridors (railway lines, roads, inland waterways, maritime shipping routes, ports, airports and railroad terminals)
- ○ Applicable to the TEN-T core and comprehensive network (covering important transport connections and notes in all EU regions)
- ○ Applicable throughout the whole transport network
- ◉ Other (please specify)

Please specify

The expansion of charging infrastructure deployment should consider the full TEN-T network (both Core and Comprehensive as well as important urban nodes) as a part of a larger dynamic model as referred to in the answer above. A clear link with focus on zero-emission mobility is required also within the revision of the TEN-T Guidelines Regulation.

4. In your view, who should set mandatory deployment targets?

- ○ Member States under national law but following a common European methodology set out in EU legislation
- ○ European legislation to set binding targets for Member Sates following a common methodology
- ◉ Other (please specify)

Please specify

At EU level, framework conditions should be established that enable the Member States to set dynamic targets that reflect market developments and take into account customer needs, usage behaviour, locations and the development of the number and technologies of vehicles.

The detailed regulation should take place at the national level on the basis of the respective market conditions. The method for determining and monitoring the strategic framework should be kept up to date consistently.

5. In your view, which power should be required in case of mandatory targets for publicly accessible recharging infrastructure for passenger cars and light duty vehicles along the TEN-T network?

- ☐ 50 kW
- ☐ 100 kW
- ☐ 150 kW
- ☐ 350 kW
- ☑ Other (please specify)

Please specify

This technical aspect should not be set in legislation but rather left to the market to naturally build up on the most suitable solutions based on charging needs and vehicles, local situation, grid connection, allow price differentiation.

6. In your view, which power should be required in case of mandatory targets for publicly accessible recharging infrastructure for heavy duty vehicles along the TEN-T network?

- ☐ 350 kW
- ☐ 1000 kW
- ☐ >1000 kW
- ☑ Other (please specify)

Please specify

This technical aspect should not be set in legislation but rather left to the market to naturally build up on the most suitable solutions based on charging needs and vehicles, local situation, grid connection, allow price differentiation.

7. In your view, which power should in case of mandatory requirements shall apply for onshore power supply in maritime ports of the TEN-T network?

- ☐ >100 kW
- ☐ >500 kW
- ☐ >1 MW

- [x] Other (please specify)

Please specify

Legislation should never support a specific form of fuels or power capacity. These should follow the requirement that market will dictate based on best available technologies. If the legislation is too prescriptive, there is a risk to have a negative impact on technology development and R&D that would not go towards a common interest. As an example, today only a couple of vehicles are capable to charge at 150kW.

8. In your view, which alternative fuel should - in case of mandatory targets - port service providers (pilotage, towage, cargo handling equipment) have to offer in ports of the TEN-T network?

- [x] Electricity
- [x] Hydrogen
- [ ] LNG
- [ ] CNG
- [ ] LPG
- [x] Other (please specify)
- [ ] Any of the above, chosen freely by the port service provider

Please specify

Legislation should promote ports as the green gateways with zero-emission mobility. This would not limit in essence the individual choices of port service providers but rather encourage clean technologies.

9. In In your view, which power should - in case of mandatory targets - be required for recharging infrastructure for inland waterways vessels along the TEN-T network?

- [ ] 350 kW
- [ ] 1000 kW
- [ ] >1000 kW
- [ ] Battery swapping technology
- [x] Other (please specify)

Please specify

This technical aspect should not be set in legislation but rather left to the market to naturally build up on the most suitable solutions based on charging needs and vehicles, local situation, grid connection, allow price differentiation.

10. In your view, how could the compliance with mandatory targets be best monitored?

- ( ) Through reporting of public authorities in Member States to the EU
- ( ) Through direct monitoring of infrastructure roll out at EU level
- (•) Other (please specify)

Please specify

National institutions for monitoring infrastructure development have already been established in some Member States and this should be improved in other countries where those do not yet exist or functional suboptimally.

An improved monitoring capacity is relevant, including an improved EAFO portal.

No strong preference as long as same methodology and standardized reporting format is agreed at EU level.

Other deployment measures for publicly accessible and non publicly accessible recharging points

11. Do you believe that owners of an electric vehicle should be entitled to have a re-charging point installed in their neighborhood?

- Yes
- No
- No opinion

12. How useful would you consider the following measures to facilitate and accelerate the development of recharging points not accessible to the public (such as private re-charging points in apartment buildings, offices, etc.)?

	Very useful	Useful	Rather not useful	Not useful	No opinion
Mandatory installation of recharging points in car parks of non-residential buildings (e.g. office buildings) that go beyond existing provisions in the Energy Efficiency for Buildings Directive	◉	○	○	○	○
Mandatory installation of recharging points in apartment buildings	◉	○	○	○	○
Right for individuals who rent an apartment/garage to install recharging points	◉	○	○	○	○
Right for individuals who own an apartment to install recharging points in apartment buildings	◉	○	○	○	○
Other	○	○	○	○	○

Please comment

1,000 character(s) maximum

For first 2: Should be a right to request installation - any obligation should make sure they are smart/connected stations. Pre-cabling is more important than just mandating stations;

For Last 2: Would be very useful to have the right

Our industry welcomes the strengthening of the contribution of the building sector to the expansion of the charging infrastructure for electromobility, especially in view of the fact that it can be assumed that a larger proportion of charging processes will continue to take place at home or at the office.

Simplifications for the installation of charging infrastructure in residential buildings are therefore essential for the full breakthrough of electromobility, since apartment owners and tenant communities make up a large proportion of private vehicle owners. At the same time in many European countries, these groups face significant obstacles when it comes to building a charging infrastructure on property.

Interoperability

Technical Specifications
In order to ensure technical interoperability between vehicles/vessels and the infrastructure throughout Europe, the directive already sets certain technical specifications, e.g. with respect to socket outlets at recharging points, and enables the Commission to adopt secondary legislation with respect to technical specifications.

13. Do you believe that further mandatory technical requirements/standards are required to ensure full interoperability of infrastructure and services across Europe?

- (●) Yes
- ( ) No
- ( ) No opinion

14. If "yes" to the previous question, in which areas would technical requirements/ standards be needed?

- [ ] Physical interfaces between vehicles/vessels and the infrastructure
- [ ] Identification and authentication of electric vehicles
- [ ] E-roaming protocols
- [ ] Interface to energy networks and / or building management systems to enable electric vehicles to provide electricity back to the grid
- [ ] Communication security
- [ ] Others
- [ ] No opinion

Please explain briefly your answer
1,000 character(s) maximum

Answer yes in order to specify in here:

Further mandatory technical requirements and standards are not needed. Mandating certain standards in an already competitive market could lead to a technological lock-in and distortion of market competition.

The Commission should instead support the capabilities of these standards and ensure their application does not cause any negative market effects. Legislation should therefore only set minimum level of criteria as well as the description of the capability instead of mandatory standards.

Moreover, national regulators should not impose additional technical specification in national laws that would hinder the single market approach.

Legislators should set a minimum set of criteria and a description of skills rather than binding standards. It is important that the best and most useful standards prevail among the competition. Binding standards or communication protocols do not mean best results.

User Information

15. In your view, should EU legislation ensure that certain information on alternative fuels infrastructure is made available to the user by digital means (e.g. through an app)?

- ○ Yes
- ○ No
- ◉ No opinion

17. In your view, should the EU legislation ensure that certain information is made available to the user by physical means?

- ◉ Yes
- ○ No
- ○ No opinion

18. If you replied yes to the previous question, which physical means are you referring to?

- ☑ Road signs on highways
- ☐ Road signs on all streets
- ☐ Other (please specify)

19. In your view, how often are the prices charged at publicly accessible re-charging points clearly identifiable?

- ○ Always
- ◉ Sometimes
- ○ Seldom
- ○ Never
- ○ I don't know

20. Currently many different concepts and price components exist to price electric recharging services, e.g. initial fee, time fee, kWh fee, possibly roaming fee. Should there be a harmonization of the display of recharging fees required at EU level?

- ○ Yes
- ◉ No
- ○ I don't know

21. In your view, where should information on the refueling/re-charging price be displayed?

- ☑ At the refueling/re-charging station
- ☑ In every app that provides information on charging infrastructure
- ☐ In every vehicle information system
- ☑ Other (please specify)

Please specify

The requirement to communicate this information should be on display only (not sticker) allowing for real-time communication with the driver. The customer should be able to receive price information before charging, regardless whether it is ad-hoc or contract-based charging. This could be also done through digital means.

Semi Public chargers

Currently the Directive only distinguishes between publicly accessible and non publicly accessible recharging infrastructure (private infrastructure located in apartment buildings or offices). However, some publicly accessible infrastructure is not located on public grounds along roads but on private property, e.g. chargers on supermarket parking lots, hotels or private car parks. It is being debated if such “semi public” infrastructure would need to be defined separately in a revision of the Directive. On that basis “semi public” infrastructure could be exempted from fulfilling some minimum requirements applicable to publicly accessible infrastructure.

22. On the possible exemption of recharging points from certain minimum requirements, to what extent, do you agree with the following statements?

	Strongly agree	Agree	Rather disagree	Strongly disagree	No opinion
Re-charging points that are located on private properties to which access can be restricted by the owner (such as charging points located on supermarket car parks, hotels, etc.) should be exempted from certain minimum requirements	○	○	◉	○	○
Recharging points where the recharging service is free of charge should be exempted from certain minimum requirements	○	○	◉	○	○
All publicly accessible recharging points should fulfil all minimum requirements	○	◉	○	○	○

Are there any other re-charging points that should be exempted from certain minimum requirements? Please explain.

500 character(s) maximum

23. In case you believe that some recharging points should be exempted from fulfilling some minimum requirements, which requirements should those be?

- [ ] Location and other static information
- [ ] Availability, and other dynamic information
- [ ] Information on re-charging prices
- [ ] Ad hoc payment functions
- [ ] Interoperability requirements with regards to the physical interface
- [ ] Interoperability requirements with regards to communication protocols
- [x] Other (please specify)

Please specify

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If an EV charger is publicly accessible, it should comply with all requirements.
If the charging station has restricted access, those minimum requirements should
not be mandatory applicable as either some functions would be redundant or not
relevant. Need to ensure that ad-hoc-charging and connectivity features are a
necessary condition in any case.
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Market Access (e-mobility markets)

24. In your view, are there currently problems that e-mobility service providers face when they want to offer their services on charging points that are operated by a third party?

- ○ Yes
- ◉ No
- ○ I don't know

25. In your view, should policy measures be introduced at the EU level to provide for the following as regards to market access for service providers?

- ○ All e-mobility service providers should be allowed to offer their services at any charge-point free of charge
- ○ All e-mobility service providers should be allowed to offer their services at any charge-point for a fee set by the legislator
- ○ All e-mobility service providers should be allowed to offer their services at any charge-point at a non-discriminatory price set by the charge point operator
- ◉ Other measures (please specify)
- ○ No additional regulation required at the EU level
- ○ No opinion

Please specify

EMSPs should be allowed to offer services on the basis of a contract with a CPO and non-discriminatory prices will be solved by market forces

Oversight question and system of arbitrage - neutral party who would bring in a CPO and EMSP to solve differences/get an agreement on issues e.g. relevant regulatory body at EU level

Some of our members are committed to market-oriented solutions that offer all market participants the opportunity to develop economical and customer-friendly products. For this, they should also be allowed to negotiate a price to cover their respective cost structure.

Integration of electro-mobility into the electricity system

26. In your view, which policy measures listed below are essential to ensure that the efficient integration of electro mobility into the electricity system is possible and fully aligned with the electricity market rules?

- [ ] Mandatory requirement for all publicly accessible recharging points (existing and new) to be equipped with smart metering systems
- [ ] Mandatory requirement for newly installed publicly accessible recharging points to be equipped with smart metering systems
- [ ] Mandatory requirement for newly installed publicly accessible recharging points to have smart charging functionalities, such as the ability to react to price and grid signals, respond to local renewable electricity generation and the ability to be controlled
- [ ] Mandatory requirements for charging points not accessible to the public to have smart charging functionalities
- [ ] Mandatory interoperability requirements for the communication between the electric vehicle and the recharging point to enable smart charging
- [ ] Mandatory interoperability requirements for the communication between the electric vehicle and the recharging point to enable vehicle to grid services
- [x] Ensure that necessary battery data is available to authorized third parties for the provision of smart charging services and vehicle to grid services
- [ ] None
- [x] Other (please specify)

Please specify

In the context of the electricity market, charging should be seen as providing a behind-the-meter service.

The best possible integration of electromobility in the energy infrastructures requires intensive cooperation between all parties involved (manufacturers, operators of charging stations and distribution network operators) and a corresponding exchange of data, especially at the interface between vehicle and charging station.

Measuring Instrument Directive meters across EU should be the reference to avoid different technical requirements in various Member States.

Eurelectric members work towards making stations capable of smart charging but it’s important that the market decides on what is needed. Mandatory is not advisable approach – preference to leave to market. Regulating only one technology would prevent from maximising the opportunities for flexibility.

Impacts

The Inception Impact Assessment (https://ec.europa.eu/transport/sites/transport/files/2020-afid-inception-ia.pdf) discusses possible impacts of potential measures for the review of this Directive. Those measures relate to a) expanding the scope of the directive to other transport modes, b) strengthening requirements on Member States to ensure the deployment of an adequate number of recharging and refuelling stations and c) ensuring user friendliness and interoperability. Please indicate your view on the impact of such measures aimed at accelerating the deployment of interoperable infrastructure and the uptake of alternative fuels in the following questions.

27. To what extent do you agree with the following statements on the likely economic impacts of measures outlined in the Inception Impact Assessment?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
They will lead to growth and jobs in in the production of vehicles/vessels and manufacturers of alternative fuels infrastructure	◉	○	○	○	○
They will contribute to a bigger market in the EU for alternative fuels	◉	○	○	○	○
They will improve international competitiveness of European industry	◉	○	○	○	○
They will have a positive impact on research and innovation	◉	○	○	○	○
They will initially put a strain on investment budgets of citizens and transport operators due to higher purchase cost of alternatively fuelled vehicles	○	◉	○	○	○

They will reduce overall expenditures of citizens and transport operators due to low maintenance cost and over time reduced investment cost	○	◉	○	○	○

28. To what extent do you agree to the following statements on environmental impacts of measures outlined in the Inception Impact Assessment?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
They will lead to less emissions of CO_2 from vehicle/vessel fleets	◉	○	○	○	○
They will lead to less emissions of air pollutants from vehicle/vessel fleets	◉	○	○	○	○
They will have positive effects on human health	◉	○	○	○	○

29. To what extent do you agree to the following statements on administrative burden and simplification?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
Expanding the scope of the Directive will lead to an increased administrative burden	○	○	◉	○	○
Replacing the National Policy Frameworks with mandatory targets will increase administrative burden	○	○	○	○	◉
Introducing more detailed requirements on interoperability and user information will increase administrative burden	○	○	○	○	◉

30. Do you have any comment on other potential impacts (not mentioned above) of the possible policy measures?

1,000 character(s) maximum

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More cohesive and functioning single market for e-mobility is needed.

More accurate counting of charging infrastructure will need to be presented
(e.g. by the EAFO portal)

Taxation has a major impact on the price competitiveness of alternative fuels.
Member States have to review their energy taxation frameworks in order to remove
current distortions and facilitate and incentivize the uptake of carbon-free
alternative fuels.
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Relevance of other action at European level

31. To what extent do you agree with following statements?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
The objectives of the revision of the Directive could be better accomplished through deployment of non-legislative tools based on guidance or recommendations by the Commission	○	○	◉	○	○
The objectives could be achieved better if policy measures discussed for the revision of the Directive were implemented through an Alternative Fuels Infrastructure Regulation that would replace the current Directive	○	◉	○	○	○

Please explain your answer.

1,000 character(s) maximum

The European Commission must perform a thorough analysis of the trade-off between a Regulation and a Directive before supporting either of the options.

In any case, a Regulation could help promoting a consistent and enforceable nature of the legislation, notably in view of potential discrepancies arising from the transposition into national laws. In addition, a Directive supposes a longer process before implementing the agreed provisions which is contrary to the urgency to improve EU's transport infrastructure laws.

Unified approach to technical requirements can be reached easier through a regulation as well. This would in turn provide competitive advantage for European companies in global markets.

The EU should work towards global standards and in turn foster greater possibilities for EU companies.

Yet for certain aspects, non-binding tools are good options – e.g. certain standards, the EU could put guidance on standard development or recommendations for standards bodies.

Final remarks

32. Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report.

1. Eurelectric approach to policies for sufficient EV charging infrastructure

This paper from August 2019 provides for a context on the general Eurelectric views on charging infrastructure and in particular a call that the current Alternative Fuels Infrastructure Directive (AFID) does not set an adequate framework to incentivise and accompany a growing uptake of electric vehicles (EVs). The paper reiterates the call for its urgent revision in view of the detailed approach on understanding charging infrastructure sufficiency as well as the guiding principles for infrastructure operability.

Link:
https://cdn.eurelectric.org/media/3972/policies_for_sufficient_ev_charging_infrastructure-2019-030-0482-01-e-h-35B30B2D.pdf

2. Charging infrastructure in Europe fit for the next decade: five key Eurelectric priorities

This paper from April 2020 denotes the main Eurelectric priorities in the context of the revision of Europe's infrastructure laws (AFID and TEN-T)

Link: https://cdn.eurelectric.org/media/4396/afid_review_-_eurelectric_priorities-2020-030-0229-01-e-h-7BB0CFF7.pdf

3. Eurelectric policy brief on TEN-T: priorities for sustainable transport and financing electricity infrastructure

This paper from June 2020 puts forward guiding policy principles for a revised and modernised TEN-T and discusses a set of policy options while sharing the experience of our members in infrastructure-related projects.

Link:https://cdn.eurelectric.org/media/4502/eurelectric_ten-t_policybrief_final-2020-030-0416-01-e-h-3AA36CE2.pdf

4.EV interoperability - use cases and recommendations for further developments (upcoming paper, summer 2020) - looking at the importance of guiding principles regarding protocols and standards

You may also want to upload some supporting documents

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Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability

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