

# **Review of Regulation (EU) 2023/1804 on the deployment of alternative fuels infrastructure (AFIR)**

**Eurelectric consultation response paper**

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# Review of Regulation (EU) 2023/1804 on the deployment of alternative fuels infrastructure (AFIR)

Fields marked with \* are mandatory.

## 1 Introduction

Regulation (EU) 2023/1804 (<https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32023R1804>) on the deployment of alternative fuels infrastructure (AFIR) creates a common framework for the deployment of alternative fuels infrastructure in the EU. AFIR is an important component of the European Green Deal and the Clean Industrial Deal as it provides for sufficient and user-friendly alternative fuels infrastructure. AFIR sets mandatory deployment targets for publicly accessible recharging and hydrogen refuelling infrastructure for road vehicles, for on shore power supply in inland waterway and maritime ports, for liquid methane infrastructure in maritime ports and for electricity supply to stationary aircraft. It equally sets requirements for the operation of such infrastructure as well as technical standards to ensure interoperability. The regulation also requires Member States to set up long-term National Policy Frameworks (NPFs) for the development of the market as concerns alternative fuels and the planning of the deployment of relevant alternative fuels infrastructure and report on its implementation.

The objective of this public consultation is to allow the general public and stakeholders to express their views on the current state of play and on the need for additional policy action at European level. Under this initiative, the Commission is considering policy measures covering the following aspects:

Ensure sufficient recharging and hydrogen refuelling infrastructure for light-duty and heavy-duty vehicles across all regions; Ensure sufficient recharging and refuelling infrastructure for vessels and aircraft; Improve user aspects, in particular with regards to reasonable and transparent pricing of recharging and refuelling infrastructure for alternative fuels Ensure compliance of recharging and refuelling infrastructure for alternative fuels with technical requirements and standards Reduce the administrative burden related to the national planning and reporting.

This Public Consultation covers different transport sectors. Respondents are encouraged to reply to those sections of the public consultation that are of direct concern to them.

## 2 About you

\*2.1 Language of my contribution

English

\*2.2 I am giving my contribution as

Business association

\*2.3 First name

**\*2.4 Surname****\*2.5 Email (this won't be published)****\*2.9 Organisation name***255 character(s) maximum***\*2.10 Organisation size****2.11 Transparency register number**

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

**\*2.13 Country of origin**

Please add your country of origin, or that of your organisation.

*This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.*

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

**\*2.15 Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☒ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☐ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the personal data protection provisions (<https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement>)

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## 3 Views on the problems

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The present initiative aims at addressing five distinct sets of potential problems, which are described below. The Commission intends to assess the appropriateness of various measures that address the potential problems identified.

**Problem 1:** AFIR sets different targets for the deployment of recharging and refuelling infrastructure for light-duty as well as for heavy-duty vehicles. However, as the targets are set at a national level there is a risk that infrastructure is not developing sufficiently and coherently in all regions across the EU.

**Problem 2:** AFIR sets deployment targets for electricity supply to stationary aircraft and for on shore power supply to vessels. However, AFIR does not set deployment targets for alternative fuels infrastructure for propulsion fuels such as electricity, hydrogen, ammonia or methanol and on shore power supply targets for inland navigation may fall short of market needs. There is a risk that market uptake of alternative fuel vessels and aircraft are delayed.

**Problem 3:** AFIR contains provisions that card payment must be accepted at recharging and hydrogen refuelling points and also contains various provisions aiming to ensure that prices are fair and transparent. However, despite such provisions, there is still a lack of full price transparency for the user and the risk to be exposed to unfair prices.

**Problem 4:** AFIR mandates common technical specifications for the areas referred to in Annex II of the regulation in order to ensure full technical interoperability of the recharging and refuelling infrastructure. However, the legislation does not include any monitoring mechanism which risks that not all standards are properly implemented. Furthermore, the regulation also sets out data sharing requirements on the infrastructure operators but access to data may still be difficult for data users through the National Access Points.

**Problem 5:** The regulation also contains planning and reporting obligations on Member States and the Commission to ensure that mandatory targets are being achieved. However, the current provisions are perceived by some stakeholders as overly detailed, thus leading to unnecessary administrative burden in the form of multiple reporting requirements. At the same time, no data is available on private charging, in particular for depot charging for heavy-duty vehicles, where most recharging sessions currently take place.

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### 3.1 Target setting for recharging and refuelling infrastructure for light-duty vehicles (LDV) as well as for heavy-duty vehicles (HDV)

\*3.1.1 The mandatory targets for **electric recharging** infrastructure of light-duty vehicles (LDV) laid down in AFIR are not sufficient to achieve the objectives of the regulation to ensure a sufficient and coherent recharging infrastructure for **LDV** across the EU.

To what extent do you agree that this is an important problem?

- ☐ Fully agree  
☐ Somewhat agree  
☐ Neutral

- ☐ Somewhat disagree
- ☒ Fully disagree
- ☐ No opinion

\*3.1.2 The mandatory targets for **electric recharging** infrastructure of heavy-duty vehicles (HDV) laid down in AFIR are not sufficient to achieve the objectives of the regulation to ensure a sufficient and coherent recharging infrastructure for **HDV** across the EU.

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☒ Somewhat disagree
- ☐ Fully disagree
- ☐ No opinion

\*3.1.3 The mandatory targets for **hydrogen refuelling** infrastructure of road vehicles laid down in AFIR are not sufficient to achieve the objectives of the regulation to ensure a sufficient and coherent recharging infrastructure for **hydrogen vehicles** across the EU.

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☐ Fully disagree
- ☒ No opinion

3.1.4 Would you like to provide additional comments/explanations in case specific targets for road transport are not sufficient?

*1,000 character(s) maximum*

The current target for LDVs and HDVs are sufficient for coherent charging infrastructure across the EU and should be maintained. For HDVs specifically which require significant grid capacity, it may be relevant for other conditions such as variations in geography or the operational patterns to also be taken into consideration for in case it would translate to low-utilisation rates.

Eurelectric does not see a role for hydrogen in road transport and this can be reflected in the lack of hydrogen refuelling sites across the EU.

The deployment of public charging infrastructure, particularly for HDVs and megawatt charging systems, must be accompanied by timely grid reinforcement and investments.

AFIR should remain closely coordinated with network planning to avoid where infrastructure deployment obligations exceed available connection capacity.

For HDVs, most charging is expected to take place in overnight depots which will require smart energy management.

## 3.2 Target setting for alternative fuels infrastructure for vessels and aircraft

\*3.2.1 The lack of mandatory targets for alternative fuels infrastructure for propulsion fuels for **maritime vessels** risks that the market uptake of alternative fuel maritime vessels is delayed.

To what extent do you agree that this is an important problem?

- ☒ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☐ Fully disagree
- ☐ No opinion

\*3.2.2 The lack of mandatory targets for alternative fuels infrastructure for propulsion fuels for **inland waterway vessels** risks that the market uptake of alternative fuel inland waterway vessels is delayed.

To what extent do you agree that this is an important problem?

- ☒ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☐ Fully disagree
- ☐ No opinion

\*3.2.3 The lack of mandatory targets for alternative fuels infrastructure for propulsion fuels for **aircraft** risks that the market uptake of alternative fuel aircraft is delayed.

To what extent do you agree that this is an important problem?

- ☒ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☐ Fully disagree
- ☐ No opinion

3.2.4 Would you like to provide additional comments/explanations in case specific targets for shipping or aviation are not sufficient? Would you have suggestions about other solutions to reach the same results?

*1,000 character(s) maximum*

Mandatory infrastructure targets are important, but for shipping they are not sufficient on their own. For onshore power supply, deployment depends not only on port-side equipment, but also on distribution-network capacity, connection planning, investment cost recovery, transparent pricing and coordination between ports, DSOs, electricity suppliers and ship operators. AFIR implementation could therefore be supported by port-DSO coordination plans, tariff transparency, grid-upgrade cost-allocation rules and non-discriminatory supplier-access principles.

The implementation of AFIR and FuelEU Maritime should also be closely aligned by synchronising port infrastructure deployment with ship obligations, promoting EU-wide technical interoperability, coordinating investments for future low-carbon fuels, and ensuring attractive pricing for shore-side electricity. A common governance and financing framework is also essential to accelerate port decarbonisation across Europe.

### 3.3 Price transparency and reasonable prices at publicly accessible recharging infrastructure

\*3.3.1 There is a lack of price transparency for recharging prices charged by operators of recharging points for recharging services paid for by payment card (debit/credit card).

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☒ Fully disagree
- ☐ No opinion

\*3.3.2 Prices charged by operators of recharging points for recharging services paid for by payment card are not reasonable.

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☒ Fully disagree
- ☐ No opinion

\*3.3.3 There is a lack of price transparency for recharging prices charged by mobility service providers (MSP) for recharging services paid through apps or MSP cards.

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☒ Fully disagree
- ☐ No opinion

\*3.3.4 Prices charged by mobility service providers (MSP) for recharging services paid through apps or MSP cards are not reasonable.

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☒ Fully disagree
- ☐ No opinion

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### 3.4 Compliance with standards and access to data

\*3.4.1 Compliance with technical specifications and standards mandated under AFIR is not ensured because of a lack of an appropriate compliance framework (e.g., certification scheme, common testing protocols).

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☒ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☐ Fully disagree
- ☐ No opinion

\*3.4.2 Access to data provided by operators of recharging and refuelling points, for example on location of infrastructure, available power output and pricing, is not ensured for end users.

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☒ Fully disagree
- ☐ No opinion

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## 3.5 Planning and reporting requirements

\*3.5.1 The current planning and reporting requirements by Member States and the Commission are excessive and lead to unnecessary administrative burden.

To what extent do you agree that this is an important problem?

- ☒ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☐ Fully disagree
- ☐ No opinion

\*3.5.2 There is currently a lack of information on private recharging infrastructure, in particular for depot recharging for heavy-duty vehicles.

To what extent do you agree that this is an important problem?

- ☐ Fully agree
- ☐ Somewhat agree
- ☒ Neutral
- ☐ Somewhat disagree
- ☐ Fully disagree
- ☐ No opinion

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## 4 Views on possible policy measures

Below there are statements on a number of possible policy measures to address the problem areas.



The policy measures described below are without prejudice to the instrument used, and may entail a mix of legislative and soft law measures (including guidelines). Given the complexity and multifaceted nature of the problems, these approaches are not necessarily mutually exclusive.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

## 4.1 Measures related to target setting for infrastructure for road vehicles

4.1.1 Adjusted target levels for recharging infrastructure for light-duty vehicles (LDV) to ensure a sufficient and coherent coverage of infrastructure across the EU while maintaining the dynamics of the recharging market.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                                                              | 1                                | 2                     | 3                                | 4                     | 5                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Setting of higher deployment targets for recharging infrastructure by increasing the power output that needs to be provided by publicly accessible recharging stations for each registered electric vehicle. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Setting of sub-targets at a regional level, to ensure regional coherence and a minimum infrastructure across all regions of the EU territory, including in cities.                                           | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Setting higher power output targets for recharging pools for LDV along the main EU transport corridors (TEN-T network).                                                                                      | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Adding flexibility in the target setting for LDV recharging pools along the TEN-T network to better reflect actual demand in different segments of the TEN-T network.                                        | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

4.1.2 Adjusted target levels for recharging infrastructure for heavy-duty vehicles (HDV) to ensure a sufficient and coherent coverage of infrastructure across the EU.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                                                          | 1                                | 2                     | 3                     | 4                     | 5                                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Setting higher power output targets for recharging pools for HDV along the TEN-T network.                                                                                                                | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Setting higher power output targets of individual recharging points within recharging pools (e.g. mandating a minimum number of Megawatt recharging stations within recharging pools dedicated for HDV). | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Adding flexibility in the target setting for HDV recharging pools along the TEN-T network to better reflect actual demand in different segments of the TEN-T network.                                    | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Setting higher targets for recharging infrastructure for HDVs in urban nodes.                                                                                                                            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |

|                                                                                                                                                                                                                                                                                                                           |                                  |                                  |                       |                       |                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| Setting higher targets for recharging infrastructure for overnight recharging of HDVs along the TEN-T network.                                                                                                                                                                                                            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Introducing minimum criteria for a recharging point or recharging pool so it can be classified as a recharging point or pool dedicated to HDV. Those criteria can include for example provisions on layout dimensions and other criteria to ensure that dedicated recharging points/pools are fully usable by all trucks. | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

#### 4.1.3 Adjusted target levels for hydrogen refuelling infrastructure for road vehicles to ensure a sufficient and coherent coverage of infrastructure across the EU.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                                                                                                 | 1                                | 2                     | 3                     | 4                     | 5                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Setting higher targets for hydrogen refuelling infrastructure along the TEN-T network.                                                                                                                                                          | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Setting higher targets for hydrogen infrastructure in urban nodes.                                                                                                                                                                              | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Providing more flexibility in the target setting for hydrogen refuelling infrastructure to better reflect actual demand based on hydrogen vehicle uptake.                                                                                       | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Setting capacity targets for individual refuelling stations not only in relation to the daily capacity but also in relation to how much hydrogen can be dispensed in e.g. one hour to allow refuelling of multiple trucks in a short timeframe. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Mandating that hydrogen refuelling points must provide gaseous and liquid hydrogen to ensure compatibility with all hydrogen vehicle technologies.                                                                                              | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |

## 4.2 Measures related to deployment targets for shipping and aviation

This section is specific to inland waterway and maritime shipping as well as to aviation.

#### 4.2.1 Measures to accelerate the deployment of alternative fuel infrastructure for inland waterway vessels in line with market needs.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                        | 1                     | 2                     | 3                     | 4                                | 5                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| Setting of targets for shore side electricity outside inland waterway ports as inland waterway vessels are often moored outside inland waterway ports. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Setting of deployment targets for recharging and refuelling infrastructure for alternative propulsion fuels for inland waterway vessels.               | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

|                                                                                                                                                     |                       |                                  |                       |                       |                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| Mandate that payment card payments (e.g. debit or credit card) are possible at all alternative fuels infrastructure for inland waterway operations. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|

#### 4.2.2 Measures to accelerate the deployment of alternative fuel infrastructure for maritime vessels in line with market needs.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                                                                                                                                                | 1                     | 2                     | 3                                | 4                     | 5                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|----------------------------------|-----------------------|----------------------------------|
| Expanding the scope of the regulation to setting targets for the deployment of shore side electricity supply for passenger or container ships of a minimum of 400 gross tonnes.                                                                                                                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> |
| Expanding the scope of the regulation to setting targets for the deployment of shore side electricity supply for other ship categories than passenger and container vessels, such as tankers.                                                                                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> |
| Setting of deployment targets for recharging and refuelling infrastructure for alternative propulsion fuels for maritime vessels.                                                                                                                                                              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> |
| Strengthening of Member States planning or the decarbonisation of the maritime sector with regards to the required alternative fuels infrastructure in ports. This can for example be achieved by adding further planning requirements for Member States under the National Policy Frameworks. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            |

#### 4.2.3 Measures to accelerate the deployment of alternative fuel infrastructure for aircraft in line with market needs.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                                                                                                                                                   | 1                     | 2                     | 3                     | 4                     | 5                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Setting of deployment targets for electric recharging infrastructure in airports for battery-electric aircraft.                                                                                                                                                                                   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Setting of deployment targets for hydrogen refuelling infrastructure in airports for hydrogen-powered aircraft.                                                                                                                                                                                   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Strengthening of Member States planning or the decarbonisation of the aviation sector with regards to the required alternative fuels infrastructure in airports. This can for example be achieved by adding further planning requirements for Member States under the National Policy Frameworks. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

### 4.3 Measures to improve user experience at publicly accessible recharging and hydrogen refuelling points

Users of alternatively fuelled vehicles should be able to refuel/recharge their vehicles easily and in an interoperable manner, having access to all relevant information. The regulation requires prices charged by

recharging point operators to be reasonable, easily and clearly comparable, transparent and non-discriminatory. The questions below seek feedback on the user experience on these aspects.

#### 4.3.1 Measures to improve price transparency at publicly accessible recharging and refuelling points.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                                                                                                                                     | 1                                | 2                     | 3                     | 4                     | 5                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Mandate that ad hoc recharging prices must be <b>displayed</b> at every recharging station. Currently, this is only required for recharging points above 50 kW while for other recharging points the ad hoc price must be made clearly and easily available (e.g., in an app only). | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Mandate that charge point operators may only charge an ad hoc price based on kWh, plus an occupancy fee at all recharging points. Currently this is only mandated for recharging points with a power output above 50 kW.                                                            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Mandate that mobility service providers may only charge a price based on kWh, plus an occupancy fee for recharging services at all recharging points.                                                                                                                               | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

#### 4.3.2 Measures to ensure reasonable prices at publicly accessible recharging and refuelling points.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                  | 1                                | 2                                | 3                                | 4                     | 5                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|----------------------------------|-----------------------|----------------------------------|
| Mandate that national competent authorities regularly monitor and report on competition in the recharging market and on price developments.      | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Measures to ensure fair tender and concession practices at Member State level that promote more competition in the recharging market.            | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> |
| Regulatory measures intervening in the price setting of charge point operators.                                                                  | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/>            |
| Regulatory measures intervening in the price setting of mobility service providers.                                                              | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/>            |
| Further specification in the recitals of the regulation what constitutes fair and reasonable prices as well as non-discriminatory price setting. | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/>            |

#### 4.3.3 Other possible measures to improve user experience at publicly accessible recharging and refuelling points.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|  | 1 | 2 | 3 | 4 | 5 |
|--|---|---|---|---|---|
|  |   |   |   |   |   |

|                                                                                                                                                                                                                                                                                                                                                                                                  |                                  |                       |                                  |                       |                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Mandate that payment card (credit/debit) must be possible at every recharging point through a payment terminal or NFC reader. Currently such terminals or readers are only required for recharging points above 50 kW, whereas for recharging points below 50 kW, payment card (credit/debit) can also be ensured through other devices using an internet connection such as a specific QR code. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Mandate that all new recharging points accessible to the public are capable of bi-directional recharging.                                                                                                                                                                                                                                                                                        | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Measures to ensure that prices at publicly accessible recharging points reflect price developments at the electricity markets, which could lead to lower prices at times of overall low electricity demand and high renewable generation and to higher prices at times of overall high electricity demand.                                                                                       | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Measures to ensure that recharging and refuelling points are accessible to persons with disabilities.                                                                                                                                                                                                                                                                                            | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

#### 4.3.4 Are there any other measures to improve the user experience at publicly accessible recharging and refuelling points that should be considered?

*500 character(s) maximum*

We support the introduction of a more gradual implementation of V2G technology to provide market participants sufficient time to adapt. Ad hoc payments like static QR codes at smaller recharging locations should be explicitly maintained. They are cost-efficient, technology-neutral and support market entry for smaller CPOs. Communication standards: explicitly recognise OCPI as a valid default data exchange protocol and avoid requiring parallel DATEX II interfaces.

## 4.4 Measures on technical interoperability aspects

### 4.4.1 Measures to ensure full compliance with technical standards.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                                                         | 1                                | 2                     | 3                                | 4                     | 5                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Mandate a self-certification scheme for the manufacturers and/or operators of recharging and refuelling points on the basis of the conformance tests specified in the corresponding mandated standards. | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Mandate manufacturers and/or operators of recharging and refuelling points to obtain a certification from a relevant national or European certification scheme.                                         | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Mandate national competent authorities to monitor the implementation of the technical specifications in the regulation and to sanction cases of non-compliance.                                         | <input type="radio"/>            | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

### 4.4.2 Measures to ensure data accessibility for end users.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                  | 1                     | 2                     | 3                                | 4                                | 5                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|
| Development of further technical specifications to ensure that the National Access Points are better harmonised and fully functional for alternative fuels data. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Strengthening the role and technical functions of the Common European Access Point to facilitate EU-wide data accessibility.                                     | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Strengthening the coordination between National Access Points and the Common European Access Point to ensure all data are made accessible in a coherent manner.  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |

## 4.5 Measures on administrative aspects

### 4.5.1 Measures to ensure fit for purpose planning and reporting.

Please rate the policy measures from 1 (not relevant) to 5 (most relevant). Not all of them need to be rated, not indicating a rating for one of the measures means that you do not have an opinion about the relevance of this specific policy measure.

|                                                                                                                                                                                                                         | 1                     | 2                     | 3                                | 4                     | 5                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Reducing reporting requirements by Member States under Art 15.                                                                                                                                                          | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Reducing the data sharing requirements under Art 18 as the data is in any case publicly available under eafv.eu.                                                                                                        | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Strengthening the planning requirements for Member States on recharging and refuelling infrastructure for HDV to include monitoring and reporting requirements on such infrastructure in private depots and warehouses. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

## 4.6 Other Measures

### 4.6.1 Are there any other measures that should be considered for revising Regulation (EU) 2023/1804?

*2,000 character(s) maximum*

The review of AFIR should focus on fine-tuning the existing framework, not replacing it. Regulatory stability is essential to protect committed investments, with priority given to improving implementation and introducing targeted adjustments while preserving the current level of ambition. Several MSs have yet to publish their NPFs. A robust governance and monitoring framework is needed to ensure effective implementation. MS NPFs should ensure closer coordination between AFIR deployment planning and distribution network development planning, enabling DSOs to anticipate future charging demand and optimise network investments.

Revising AFIR is an important step that will only be effective if accompanied by an adequate framework to support the necessary adaptation of distribution networks. Delivering the AFIR objectives requires regulatory provisions that enable DSOs to anticipate and finance grid investments ahead of demand, particularly for the deployment of charging infrastructure. Thus, the review should assess the relationship between deployment targets and network readiness, including connection lead times, availability of network capacity and consistency with network development plans.

Appropriate financial mechanisms and network tariff arrangements should support these investments, including for the deployment of HDV charging infrastructure. AFIR should also support smart charging and market-based flexibility by promoting interoperability and digital functionalities that allow EV charging to respond to electricity market signals and system needs. Non-discriminatory data access for all EV-related data is critical to ensure seamless interoperability across the EV ecosystem.

There should be greater integration and coherence between national platforms and access points. A Single European Access Point for infrastructure data could then eventually be implemented.

Lastly, electricity should be taxed less than fossil fuels and chargepoints need faster permitting

4.6.2 You may also attach any document(s) to provide evidence to support your responses.

**Eurelectric-AFIR-position-paper-FINAL\_\_1\_.pdf**

## Contact

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Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent a total of +3500 companies 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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