Union Française de l'Électricité

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UFE answers to the EC consultation on the Roadmap on the Revision of Regulation on Union Guidelines for the development of the transEuropean transport network (TEN-T)

Given the surge of electric vehicle (EV) sales in 2020 and the 90% emission reduction objective set by 2050 for the transport sector in the EU Green Deal, UFE fully welcomes the announced revision of the EU guidelines for the development of Trans-European Transport Network (TEN-T).

UFE agrees with the problems identified in the Inception Impact Assessment (IIA) and would like to highlight some key features to be considered when aligning the TEN-T guidelines with the last EU transport policies developments.

1. *Ensure the consistent coverage of charging infrastructure on public roads for all TEN-T modes*

In light of the surge of EVs in 2020 and the objective of 1 million public charging points to be installed in Europe by 2025, **it is vital that Member States acquire the right and necessary charging infrastructure and deploy them on both the TEN-T Core and Comprehensive Network**.

To this end, UFE supports **integrating minimum binding requirements per vehicle type for charging infrastructure from the upcoming revised Alternative Fuels Infrastructure Directive (AFID) and other related transport policies into the TEN-T Core Network** taking into account the geographic, density and traffic specificities of territories. Additional ad-hoc subsidies should be introduced to cope with the expected costs of deploying charging infrastructure and ensure consistency between TEN-T and AFID.

Moreover, UFE believes **the principle of corridor could be reassessed in light of national needs** in order to ensure the full and appropriate coverage of all Member States with

charging infrastructure. The deployment of charging infrastructure should therefore go beyond the main axes defined at EU level.

2. *Strengthen the synergies between TEN-T and energy policies*

UFE has long emphasised the **existing synergies between transport, energy and climate policies** and the need to create further linkages between them. We thus endorse the EC's intention to **make sure the revisions of TEN-T and TEN-E guidelines go hand in hand** in order to coordinate the coherent planning and construction of the European electricity infrastructure and to decarbonise the end-using sectors. Indeed, linking TEN-T and TEN-E will provide several benefits such as allowing and providing further support to new projects and could also contribute to assessing the prospects of projects regarding smart charging or renewables for EV charging.

3. *Extend the provisions on urban nodes*

UFE considers that **the revision of the TEN-T guidelines should address the need to increase the number of urban nodes** and accelerate the coordination between the Member States for cross-border charging. To do this, stakeholders should be more involved in the promotion of EV charging infrastructure in urban nodes by continuing to enhance the Sustainability Urban Mobility Plans (SUMPs).

4. *Enhance the digitalisation of TEN-T infrastructure*

UFE supports the strengthening of provisions to improve the digital dimension of TEN-T. To ensure the development of new intelligent services for EVs and charging infrastructure, the EC must ensure non-discriminatory access to relevant data on EVs (e.g. state of charge of the battery), for all types and brands of vehicles, and for all concerned actors. It will contribute improving EV-user experience and developing charging services.