



Union Française de l'Électricité

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Position Paper

To achieve the decarbonisation of transport, the Directive 2014/94/EU on the deployment of Alternative Fuels Infrastructure needs to be revised with ambitious targets

The French Electricity Industry (UFE) welcomes and fully supports the EU's intention to revise the Directive 2014/94/EU on the deployment of Alternative Fuels Infrastructure (AFID) to align it with the European Green Deal.

Transport accounts for almost a third of the GHG emissions in the EU and represents the only sector where emissions keep rising. **To achieve the objective of carbon neutrality by 2050, the transport sector needs to reach a 90% reduction of its GHG emissions by this time, for which electrification will be a cornerstone.**

UFE firmly believes the revision of the AFID will assure the massive roll-out of an EU-wide harmonised and consistent charging infrastructure adapted to the surge of the e-mobility market. The deployment of charging infrastructure could be supported within the EU recovery plan, so called "Next Generation EU", as the electromobility is key for the decarbonisation of transport. It will contribute to mitigate the impact of the COVID-19 crisis on the sector while staying the course on GHG emission reduction in Europe.

UFE calls to review the list of alternative fuels to be consistent with the objective of 2050, to extend the **scope of the Directive**, to set **minimum binding requirements per Member States for the deployment of charging points**, to assess the possible use of **smart charging in the public charging infrastructure for electric vehicles (EV)** and to improve **interoperability** for road transport.

UFE supports a **fast and ambitious implementation of the revised Directive**, in particular with regard to the articles on the infrastructure for road transport to meet the EU renewed climate objectives.



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The scope of the Directive must be extended

To speed up the roll-out of charging infrastructures across Member States, **the EC should push for the extension of the scope of the AFID.**

First, **the scope of the Directive should be extended to all accessible infrastructure to the public**, i.e. public infrastructure and recharging infrastructure on parking spaces in non-residential buildings accessible to the public (e.g. commercial properties). The EC should **differentiate minimum requirements for the public infrastructure on public grounds and publicly accessible infrastructure on private grounds** (i.e. semi-public) to support fully interoperable charging points without deterring private investments. Such requirements should be highest for public infrastructure than for semi-public ones. In addition, considering that around 90% of the charging take place at home or in the workplace, **the EC should assess the existent obstacles to non-public charging points to guarantee an effective right-to-plug for all European citizens.** Thus, the new AFID could address the gaps related to the private infrastructure existing in the Energy Performance Buildings Directive (EPBD), in particular regarding residential and non-residential co-properties.

Second, the revised AFID should further meet the rapid technological developments which are not sufficiently included in the current Directive. To this end, **the differentiation of the charging power levels, to be in line with the progress made on high-power charging, should be recognised.** This would allow the charging power levels to be adapted, for instance, to the needs of the heavy-duty vehicle segment.

In addition, the revision of the AFID should also encourage the creation of incentives to foster the electrification of maritime transports. Considering several EU initiatives such as EU Fuel Maritime foresee the increase of the electricity usages, the incentivisation of the electrification of maritime transport will play an important role in the decarbonisation of transport and should therefore be examined by the EC. The new AFID should **carefully assess the prospects of decarbonised hydrogen for the long-haul vehicles and maritime transport.** On the issue of the ports for instance, direct electrification should remain the privileged solution in the short term especially considering cold ironing. On the long term, nonetheless, indirect electrification, through low-carbon hydrogen, should be envisaged.



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A new approach should be applied to address the EV market evolution

In the new Directive, the EU needs to ensure **the fuels falling under its scope are consistent with the targets defined in the EU CO2 legislations**. Therefore, **the definition of “alternative fuels” must be revised** and adapted to the type of vehicle.

On the one hand, to ensure technology neutrality and an effective decarbonisation of transport, UFE believes a **new definition should be introduced for the light-duty vehicles (LDVs)**, i.e. cars and vans, establishing a **CO2 emission threshold to support only zero-emission fuels and to ensure technology neutrality**. This definition should be consistent with the CO2 emission thresholds set by the European Parliament and the Council in the Regulation (EU) 2019/631. On the other hand, although this approach violates the principle of technology neutrality, UFE recommends **maintaining an exhaustive list of “alternative fuels” to apply to the heavy-duty vehicles (HDVs)**, while guaranteeing the compatibility of the fuels with the 2030 and 2050 targets. Hence, this list should only include electricity, low-carbon hydrogen, biogas, e-fuels and biofuels. These new definitions will ensure the fuels defined in the AFID are in line with the EU Green Deal and remain adapted to the advancements in technology and the state of the market.

To achieve carbon neutrality by 2050, the EU will need to speed up the roll-out of charging infrastructure across the Member States. **Minimum binding targets should be set per Member States and per vehicle type** (LDVs or HDVs as they use different type of charging points) to accelerate the deployment of recharging points throughout the EU. The EC will need to define **a new methodology** to set the deployment targets, which should reflect the diversity of needs and uses of charging infrastructure among Member States.

The new AFID should recognise **the importance of local and regional authorities in the deployment of charging infrastructure**. They should be further consulted through a **global approach in the drafting of the development plans for the roll-out of charging infrastructure**. The AFID should encourage local authorities to put in place policies allowing citizens to request the installation of charging infrastructure in their **neighbourhood**. It should also provide transparent and accountable processes to assist the decision-taking on the approval of such requests. **The new metric should thus consider geographic and demographic criteria**. Taking France as an example, the French local authorities will be consulted in preparing and implementing the upcoming masterplans which will set up the deployment of charging points through the country.



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The National Policy Frameworks (NPFs) remain therefore a useful tool to respond to the needs of the territories. However, more coordination is required between the Member States to ensure an EU-wide and efficient roll-out of charging infrastructure. UFE points out that the current monitoring is not fully efficient and needs to be improved. Considering the importance of the local level in the deployment of charging infrastructure, the EU should not favour an EU direct monitoring. **The AFID monitoring should be tightened** by for instance **national ad-hoc bodies which could report on the progress of the Member States to the European Commission**. These bodies could be based on the models of the national energy authorities in the Member States or be designed as a specific agency.

Smart charging could be introduced in public charging infrastructure

UFE is confident in the ability of the electricity power system to integrate the important deployment of EVs by 2030 and further. Taking France as an example, the Distribution System Operators (DSOs) have assessed the level of EV uptake into the electricity grids and their level of preparedness. Although further investments will be required to adapt the power networks to e-mobility, the French DSOs have anticipated and planned the needed investments and estimated they will **not count for more than 10% of the total investments incurred by 2030¹**.

Nevertheless, even if the electricity system is prepared to face the integration of EVs into the grids, **the prospects of the deployment of smart charging devices should be assessed** for public normal charging points. Smart charging could in fact contribute to enhance the resilience of the electricity system to cope with random events or crises. In addition, it could provide cost savings and ease the integration of renewable energies into the grids. The deployment of smart charging could provide benefits in particular for **the residential district and tertiary areas where a lack of private charging infrastructure can be observed in condominiums**.

Thus, the scope of the new AFID could be extended to identify the prospects of smart charging technologies by introducing a **definition of “smart charging”**. Minimum functionalities could be set for newly installed publicly accessible normal recharging points equipped with smart charging in residential and tertial districts preferably.

¹ [Report on the integration of electromobility to the public electricity distribution network](#) (November 2019)



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UFE encourages the EC to evaluate the remaining regulatory obstacles to smart charging to guarantee an open and non-discriminatory access to battery-related data, which is a precondition for third party “smart charging services” operators.

Interoperability should be improved to ease the consumer’s experience

UFE recommends the EC to **address interoperability through a consumer approach** by further **guaranteeing payment solutions** (preferably payment by apps or contactless solutions) and **price information**. To ease the consumers’ travelling experience throughout the EU, **information should be made available on the location and access of charging infrastructure** by installing road signs on highways and streets, or leading public advertisement campaign to raise knowledge among consumers. In addition, **open networks based on open standards and protocols** should be ensured as well as **the sharing of information between all the different actors**. It is in the competitive interest of all players to ensure sufficient and high-quality information are available as it is an important aspect of the consumer experience.

UFE warns the EC that roaming must be understood as roaming of charging service and not as roaming of supply of good. By choosing a charging point operator or an e-mobility service provider, an EV driver should be able to charge easily its vehicle throughout Europe without checking the electricity provider (e.g. conventional service stations). The market rules should allow mobility service providers to have a fair and adequate access to the network of the charge point operator on the basis of commercial criteria. Thus, these rules should assure the technical interoperability between the players and infrastructure by facilitating the access to all publicly accessible charging infrastructure with for instance a RFID card or any other technological means. Furthermore, overcharges of the network usage could be regulated by pushing for agreements to compensate it.

The **standardisation of charging infrastructure** should also be encouraged across the EU to help reducing the fragmentation of the market. An EU Mid-certified meter should be promoted in the new AFID as standard for both AC and DC stations. This will enable to avoid national specifications and mandates integrating stringent measuring requirements in existing stations (“grandfathering”). Considering the lack of a uniform standard for HDV charging technology, UFE proposes to recognise the CCS-based communication protocol as the EU standard for high-power charging in the heavy-duty segment and to make it interoperable with all types of vehicles.



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The revised AFID is complementary to the TEN-T Core and Comprehensive Networks

The EC should address the revision of the AFID in tandem with the assessment of the TEN-T Core and Comprehensive Networks as the AFID contributes to deploy adequate charging points alongside the TEN-T roads. The targets enshrined into the TEN-T Core Network should be mandatory for both TEN-T Core and Comprehensive Networks to strengthen the deployment of charging infrastructures across Member States. **The EC should however let the market decide the most useful power level for the minimum requirements** setting the number of charging points, power and ratio to the number of EVs. As for urban nodes, their minimum quantity set across the TEN-T should be revised upwards.

In addition, the new AFID should make sure the deployment of alternative fuels infrastructure across the whole transport network is suitable to the demand trends. By doing so, the EC will ensure the deployed infrastructure match the actual needs on the roads, in terms of demographic density and transit traffic, as well as their use by the consumers.