

STF report on the possible AFID revision

smartEn inputs to DG MOVE

August 2019

The present document aims at providing some comments to DG MOVE on the Report “Analysis of stakeholder views on key policy needs and options for action in Alternative Fuel Infrastructure deployment and consumer services” shared to stakeholders on 19 July.

As requested, smartEn’s recommendations aim at highlighting (i) obvious factual errors; (ii) issues that were clearly overlooked; (iii) lack of clarity of the report.

- **Page 10: Contemplate the complementarity between National Policy Frameworks (NPF) and mandatory deployment targets**

The report seems to put in contradiction the improvement of National Policy Frameworks (NPF) and the identification of mandatory deployment targets for alternative fuels infrastructures. However, the two measures can be complementary.

While setting new mandatory targets is welcomed, the NPF mechanism should be reinforced by taking inspiration from the Governance Regulation and the development of National Energy and Climate Plans that follow a common binding template to ensure comparability.

- **Page 11: Consider the energy system when planning deployment of publicly accessible infrastructures**

The report correctly highlights the need to identify a new set of metrics to underpin the (possible) mandatory deployment targets. Even if not supported by a target, any efficient planning should also take into account the status of the electricity system (i.e. possible congestion areas, digitalisation and flexibility of the grid), beyond the fleet and traffic volumes and spatial requirements already listed in the report.

Planning of deployment should be part of the emerging discussions about local flexibility. For example, DSOs should publish maps showing where implementing a charging station could be beneficial to the grid.

- **Page 18: Investigate the possibility to set special incentives for smart charging infrastructures in shared buildings**

The report highlights the consensus among stakeholders on the need to provide public funds for charging infrastructures, notably for fast charging. However, both the questionnaire and the report overlook on the difference between building types which can deploy normal charging infrastructure. Along with multi-family buildings, also shared commercial buildings can host normal charging infrastructures. This is an issue that should be targeted through the revised AFID (and not left to an ambitious implementation of the revised EPBD) because such charging points could be semi-public. In particular, a special incentive should be provided for the installation of centralized smart charging for common use in shared commercial buildings. This is a cost-efficient solution which should be supported through public incentives due to the higher capex investment.

- **Page 38: Consider also DC charging for normal power**

In the new classification suggested by the JRC and highlighted in the report, DC is limited to fast charging and high power. However, this is not systematic as DC charging can enable the charging point to charge at normal power (< 22 kW).

- **Pages 57/58: Contemplate the possibility to avoid double taxation through EU law**

The report states that Member States are solely responsible for their own tax regimes, but EU policy-makers can set minimum requirements across Europe. A possible revision of the 2003 Energy Taxation Directive can be instrumental to eliminate this bottleneck.

Beyond taxes, also double network charges and levies currently make the business case negative for V2G. Although the issue was addressed in the Electricity Directive (article 15), the report does not identify them as current bottlenecks.

In addition, the report (and the questionnaire) does not address two issues that the revised AFID should target to enhance e-mobility. [smartEn White Paper “Making electric vehicles integral parts of the power system”](#) explains and provides further details on the need to:

- Simplify the interconnection process of the charging infrastructure with the grid (Chapter 1.c);
- Set a common registration process for EVs as service providers (Chapter 4.e).