

Inception Impact Assessment on the AFID revision

smartEn contribution to the European Commission

smartEn welcomes the launch of a consultation phase with stakeholders in view of the revision of the Alternative Fuels Infrastructure Directive (AFID).

We would like to highlight the following inputs on the published Roadmap/Inception Impact Assessment:

- the scope of the identified Objectives and Policy Options to tackle Problems n. 1 and 2 on the lack of a comprehensive network of charging points should be expanded. While the current AFID focuses only on infrastructure along nodes and the Trans-European Network, the revised legislation should focus more on urban areas as well as buildings where the vast majority of charging will take place, whether in public (streets, public parking) or private space (at work, at home), and possibly adapt the requirements to the nature of the charging place;
- the identified Problem n. 4, i.e. the lack of a proper integration between energy and transport sectors, is a crucial one. Building-up an EV charging infrastructure network will be an important enabler for the transition to a carbon-neutral economy not only if it is dense, widespread, reliable and easy-to-use, but also if it is integrated with the grid to allow the power system to benefit from the TWhs of capacity of batteries on wheels in parking lots, garages and streets. And vice-versa, to allow EVs to benefit from green energy when it is cheap and abundant.
In order to overcome Problem n. 4, smartEn supports the identified Objective and Policy Option to enable deployment of “smart recharging infrastructure”. However, smart charging infrastructure should be future proof and not preclude future evolution, for example bidirectional flows of energy with the grid. Vehicle-to-grid services should be possible wherever the driver plugs in Europe. The transition to a climate-neutral economy requires a robust policy framework that must keep open to future innovations. Avoiding lock-in, stranded assets and avoiding deployment of non-future-proof infrastructure should be a key objective of a revised AFID.

To conclude, smartEn believes that given the fundamentally new nature of EV charging infrastructure, an Implementation Plan to provide guidance to Member States for implementing key provision will be required.