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Statement from Business Region Göteborg on

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

on the deployment of alternative fuels infrastructure, and repealing Directive 2014/94/EU of the European Parliament and of the Council

according to request from Stadsledningskontoret Göteborgs Stad on 2021-08-11.

Summary

Generic comments from a business climate perspective

The proposed regulation appears to be a great and welcome improvement of previous directive, with specific targets and a coverage aiming for a European-wide transition to an integrated zero-emission transport system, both on land, water and in the air. The regulation will greatly support both the public sector and the markets to align to, and prepare for, the necessary transition in a predictable and fair way. For member states with strong economies and developed industrial cluster with a high level of research and innovation, the regulation appears defensive regarding target levels and target years.

The proposed regulation creates a clear picture of expected deployment of charging and refuelling infrastructure for zero-emission vehicles. The regulation creates a predictability regarding market expectations on technical level, expected features, network density, etc supporting in product and service development as well as investment decisions.

The proposed regulation regarding smart charging and smart metering, offers an interesting foundation for an open data eco-system, which can serve for innovative service development. To further support this, especially interesting for a broadly digitalised society as in Sweden, further requirement on data sharing from charging/refuelling infrastructure usage would be beneficiary for both business possibilities and users.

Some further clarifications and specifications are needed to increase useability and relevance of the proposed regulation. Further detailing would support investment decisions and minimizes risk taking for involved market stakeholders.

Some sections of the regulation seem very defensive considering the market development and market position in leading EU member states. This could lead to a passive and retarded deployment and roll-out of the zero-emission vehicles on markets which could go ahead – both regarding technical matureness and economic strength.

Assessment

On details of proposed regulation:

- Articl 3-§1: changing measurement method from number of charging points per electric vehicle to amount of kW installed charging effect per electric vehicle.
    - Comment: New measurement/comparison method gives a clearer and fairer picture on the actual availability of energy amount per time period, i.e. how fast and convenient available electric vehicles can charge. With new measurement method, faster charging infrastructure get higher weighting and higher valued. Relevant for roll-out and acceptance of electric vehicles and their lower driving range compared to conventional (diesel/petrol) vehicles.
- Article 3-§2: For LDV should every 60 km from 2025 charging stations exist, with at least 300kW installed effect, whereof at least one charging point offering at least 150kW. From 2030 charging stations shall offer total effect of 600 kW, whereof at least 2 charging points with 150 kW.
    - Comment: Few LDV today with charging effects above 100kW. Prognosis 2025 – still the major part of electric vehicles on the road will have charging effects limited to 50-100kW (technical limitations). Possibly better to lower the requirement on minimum charging effect in favour of more charging points for the 2025 target.
    - Comment regarding bidirectional charging: a target and policy for bidirectional charging is missing. This would beneficial both to grid owners/operators, vehicle (fleet) owners and users, real estate sector.
- Article 4-§1: For HDV a 1400kW/1x350kW regulations is valid from 2025, and a 3500kW/2x350kW regulation from 2030.
    - Comment: With market expectation of 50% sales of battery electric vehicle 2030, the charging infrastructure for regional (and long-haul) must be in place earlier than that. Charging rates of HDV are expected to be in the range of 350 kW and above and regulation shall take this into account for the 2030 target and propose ~700kW charging points. Especially for the top-up charging needed between depots and distribution centrals, ultra-fast charging is required to minimize vehicle “down-time”. Also higher top-up charging rates will become necessary with larger distance between charging stations as proposed for TEN-T comprehensive network (100km).
    - C), d), e) – in general, HDV will need charging rates from 350 kW for top-up charging for competitiveness.
    - Comment regarding bidirectional charging: a target and policy for bidirectional charging is missing. This would beneficial both to grid owners/operators, vehicle (fleet) owners and users, real estate sector.
- Article 5 §2: Regulation to payment methods and pricing.
    - Comment: very welcome regulation for all users of charging infrastructure, greatly improving convenience. The refitting regulation proposal for charging stations till 2027 is late – the technology is already mature and globally available, the market/users demand/request this already today. The refitting regulation shall also comprehend charging stations with a power output below 50kW, i.e. all charging stations subject to payment requirement.
- Article 5 §6: Reasonable, transparent and non-discriminatory pricing
    - If this paragraph means that no roaming fees are allowed, either between service providers nor cross-border, this is welcome – otherwise this should be the case. Similar to mobile network roaming regulation.

- Article 6: Hydrogen refuelling infrastructure deployment targets
    - Comments: No comment, due to lack of competence
- Article 7: Regulation to payment methods and pricing
    - Comment: See comment on Article 5
- Article 8: LNG infrastructure
    - Comment: No comments
- Article 9 §1-2: Targets for shore-side electricity supply in maritime ports
    - Comment: No comments on ship and shipment limits for which the proposed regulation would be relevant – competence missing. However, the target year of 2030 seems very defensive as shore-side electricity supply serves for a great impact on local air pollution in built-up areas and workplaces. It is a simple technicality, however access to required power levels from electricity grid can be a limiting factor. However, compared to changing the fuel for off-shore transport it is a simple measure to lower the overall, and especially local emissions to improve health.
- Article 10: Targets for shore-side electricity supply in inland waterway ports
    - Comment: Target year and target level (at least one (1) installation) for shore-side electricity seems defensive. Inland waterway vessels are most likely smaller than ocean waterway vessels and requires less energy/effect.
- Article 11: Targets for LNG supply in maritime ports
    - Comment: No comment – competence missing
- Article 12: Targets for supply of electricity to stationary aircraft
    - Comment: Good regulation, but target years seems defensive. Airports have good opportunities for locally produced regenerative electricity to cover for effect peaks. Regulation should be amended with targets also for ground bound vehicles on airports. Great potential for vehicle electrification on airport ground bound service vehicles has been shown.
- Article 13: Preparation of national policy frameworks
    - Comment: To keep up the speed in transition to a zero-emission transport system, the market and business climate would benefit from an iterative approach and yearly, possibly biennial, preparation of national policy frameworks. This document sets the foundation and the “game rules” for the market and clarifies the expectations and measures required. The national policy framework offers a fair competition between stakeholders and an agreed set of targets and objectives to arrange to and gives important information for market actors to decide on investments and risk taking. Higher frequency would also be in line with the yearly reporting of progress as described in Article 16.
- Article 14: Reporting
    - Comment: No comment
- Article 15: Review of national policy frameworks and progress reports
    - Comment: No comment
- Article 16: Progress tracking
    - Comment: No comment
- Article 17: Progress tracking
    - Comment: No comment
- Article 18: Data provisions
    - Comment: Proposed data to deliver is kind of standard already now (2021) and the target year seems defensive. However, a central organisation for gathering is not available, but needed. For further investments with lower risk (hence more attractive to

be market driven) in charging/refuelling installations, open data regarding utilisation (anonymised) of existing infrastructure is important and valuable.

- Article 19 - 24: Common technical specifications, Exercise of delegation, Committee procedure, Review, etc.
    - Comment: No comment
- Annex I: Reporting
    - Comment: No comment
- Annex II: Technical specifications
    - Comment: Many points of technical specifications that needs to be agreed upon.
- Annex III: Reporting requirements
    - Comment: No comment
- Annex IV: Correlation table
    - Comment: No comment

Anne Piegsa, 2021-08-23

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