



EASE's Reply – Public consultation concerning the Revision of the Directive 2014/94/EU on the Deployment of Alternative Fuels Infrastructure (AFID)

June 2020

INTRODUCTION

Following the policy ambition set out by the European Green Deal for the EU to become a climate neutral economy by 2050, transport emissions have to decrease by 90% by that year.

Recharging and refuelling infrastructure need to be ready to meet the demand for sustainable alternative fuels in all modes of transport.

Directive 2014/94/EU on deployment of alternative fuels infrastructure (AFID) was adopted in 2014 to ensure a common framework of measures for the deployment of alternative fuels infrastructure in Member States. The central means are national policy frameworks that Member States had to adopt in 2016. Moreover, the Directive sets technical specifications for the interoperability of infrastructure. However, alternative fuels infrastructure is not available evenly across the EU. Member States' national policy frameworks under Directive 2014/94/EU show, on average, a lack of ambition to ensure adequate rollout and easy cross-border usability in the critical period post 2020.

The European Commission is inviting the public and stakeholders to express their opinion and share information on the impact of the existing Directive as well as on possible measures and potential impacts of its revision. EASE believes this a great opportunity to present the EASE position on how the transport sector can be decarbonised thanks to a.o. energy storage solutions.

General assessment of the Directive's relevance and scope (questions related to the evaluation)

The Alternative Fuels Infrastructure Directive aims at a coordinated approach for the roll out of alternative fuels infrastructure in Member States by means of setting obligatory requirements for the development of national policy frameworks. Member States had to outline national targets, objectives and supporting actions for the deployment of such infrastructure that should be coordinated and coherent at EU level. Common technical specifications adopted under that Directive should support this approach.

1. In your view, how relevant is a policy on alternative fuels infrastructure at EU level as established by the Alternative Fuel Infrastructure Directive to support the uptake of alternative fuels?

- Very relevant
- Relevant
- Less relevant
- Not relevant
- No opinion

2. Currently, the Directive covers electricity, hydrogen, biofuels, synthetic and parafinic fuels, compressed natural gas (CNG), liquefied natural gas (LNG) and liquefied petroleum gas (LPG) as main alternative transport fuels. In your view, is this scope still appropriate in the context of the long-term objective of the European Green Deal to reduce transport emissions by 90% by 2050?

- It is fully appropriate
- It is appropriate
- It is rather not appropriate
- It is not appropriate
- No opinion

In case you answered "It is rather not appropriate" or "It is not appropriate", can you please indicate why?

- Some fuels are missing (please specify)
- Some fuels are not relevant anymore (please specify)

Other (please specify)

Please specify "Some fuels are missing"

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Please specify "Some fuels are not relevant anymore"

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Please specify "Other"

The Alternative Fuels Infrastructure (AFI) Directive – or, as EASE will suggest later, a new AFI Regulation – should focus mainly on new emerging transport means, mainly BEVs and FCEVs, and support synthetic fuels (which can be made based on methanised renewable hydrogen from power-to-gas-to-fuels processes) such as synthetic LNG and CNG and methanol, coherently with e.g. REDII. The infrastructure for BEVs and FCEVs needs to be rolled out. For synthetic fuels, e.g. CNG/LNG and methanol, although parts of the infrastructure may exist already, availability and access to filling stations is still a key issue.

3. Currently the Alternative Fuel Infrastructure Directive covers alternative fuels infrastructure for road and shipping. In your view, is this appropriate?

- the Directive should also cover rail infrastructure
- the Directive should also cover airport infrastructure for ground movements (e.g. vehicles for transport of passenger or for supporting taxiing of aircraft etc.)
- Other (please specify)
- the Directive already covers all relevant transport modes
- No opinion

Please specify

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4. The Alternative Fuels Infrastructure Directive currently requires from Member States to establish “National Policy Frameworks” (NPFs). Within this framework, Member States have to develop targets and objectives for the deployment of alternative fuels infrastructure, based on an assessment by the Member States of national, regional or EU-wide demand. In your view, are the NPFs the right instrument to ensure the development of a coherent infrastructure network throughout the EU?

- They are the right policy instrument
- They are the right instrument but the provisions in the directive are not prescriptive enough to avoid diverging interpretation and application by Member States. The provisions in the directive should therefore be strengthened
- They are only partly sufficient. Additional/complementary instruments would be needed to avoid diverging interpretation and application by Member States
- They are not the right instrument because they are not sufficiently stringent. Therefore they should be replaced by alternative, more stringent instruments
- They are not the right instrument and should be abandoned without being replaced by alternative instruments
- No opinion

Please explain briefly your answer in particular what additional/complementary/alternative instruments you would suggest. 500 character(s) maximum

The revised legislation should enforce binding targets for Member State in the deployment of public electric charging and refuelling infrastructure, including binding targets on the minimum proportion of fast charging points based on a sound methodology. Regarding such methodology, EASE has published a Position Paper on the matter (see last answer).

5. Currently the Alternative Fuel Infrastructure Directive addresses publicly accessible fuels infrastructure only. Should it also address infrastructure not accessible to the public?

- It should cover all infrastructure, publicly accessible and not publicly accessible
- It should cover publicly accessible infrastructure only, with distinction required between public infrastructure on public grounds and publicly accessible infrastructure on private grounds ("Semi public" infrastructure)
- The current scope (publicly accessible fuels infrastructure only) is fine
- Other (please specify)
- No opinion

6. The Alternative Fuels Infrastructure Directive currently requires from Member States to ensure that relevant, consistent and clear information is made available to consumers/users as regards those motor vehicles which are fueled with alternative fuels. Such information has to be made available in motor vehicle manuals, at refueling and recharging points, on motor vehicles and in motor vehicle dealerships in their territory (Article 7). In your view, are the current provisions in AFID effective in ensuring that consumers/users receive relevant, consistent and clear information on the compatibility of their vehicle engine/model with the alternative fuels/recharging options available at each refueling/recharging point?

- These provisions in the directive are effective
- These provisions in the directive are only partly or not at all effective and additional/complementary provisions are needed
- The directive is not the right instrument and corresponding provisions should be replaced by more effective instrument(s)
- The directive is not the right instrument and corresponding provisions should be abandoned without being replaced by alternative instruments
- No opinion

Please explain briefly your answer.

500 character(s) maximum

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Main Problems

1. A rapid uptake of alternatively fuelled vehicles and vessels is expected in the next decade. For example, the European Green Deal considers it likely that by 2025 around 13 million zero and low emission vehicles will circulate on roads. In your view, are the National Policy Frameworks the adequate instrument to ensure that a sufficient number of publicly accessible infrastructure will be deployed over the next decade?

	Fully adequate	Adequate	Rather not adequate	Not adequate	I don't know
Electric rechargers for cars and light duty vehicles in urban/suburban agglomerations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electric rechargers for cars and light duty vehicles along the main highways	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electric rechargers for trucks / heavy duty vehicles in urban/suburban agglomerations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electric rechargers for trucks / heavy duty vehicles along the main highways	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electric rechargers for busses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
CNG refuelling stations in urban/suburban agglomerations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
CNG refuelling stations along the main highways	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
LNG refuelling stations at maritime ports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
LNG refuelling stations at inland ports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
LNG refuelling stations along the main highways	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hydrogen refuelling stations in urban/suburban agglomerations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Hydrogen refuelling stations along the main highways	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
On Shore Power Supply in inland waterway ports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
On Shore Power Supply in maritime ports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

2. In your opinion, do users of electric vehicles face problems when it comes to payments when charging their vehicles at re-charging points operated by an entity with which the user does not have a contract?

- Yes, frequently
- Sometimes
- Seldom
- Never
- I don't know

3. In your view and experience, is the information that is currently provided on location, availability, etc. of re-charging and re-fuelling points sufficient to cover the needs of the user?

- Information to users is fully sufficient
- Information to users is largely sufficient
- Information to users is rather insufficient
- Information to users is insufficient
- I don't know

4. The Commission assessment of the national policy frameworks developed under the Directive shows a variety of approaches to setting targets, objectives and supportive actions. Please indicate to what extent do you agree with the following observations?

	Fully agree	Largely agree	Rather disagree	Completely disagree	No opinion
"There is uneven and insufficient deployment of alternative fuels infrastructure within a Member State because the Directive does not specify in sufficient detail the requirements for the roll out of alternative fuels infrastructure, with respect to the required number and technical requirements."	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"There is uneven and insufficient deployment of alternative fuels infrastructure across Member States because the Directive does not ensure that Member States cooperate with stakeholders and with other Member States to deliver a sufficiently dense and interoperable network throughout the	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Fully agree Largely agree Rather disagree Completely disagree No opinion

EU."

"Users cannot easily recharge or refuel their vehicles/vessels throughout the EU because the directive does not ensure a uniform approach towards the use of alternative fuel infrastructure and subsequent payments."



5. In your view, are there are other causes of the limited impact of the Directive? Please explain. 1000 character(s) maximum

Member States (MS) were required to set up National Policy Frameworks (NPFs). In the NPFs, MS outline their national targets, objectives, and supporting actions for development of the market, including deployment of the necessary infrastructure to be put in place. The NPFs had differing levels of effort and available funding between MS. The deployment of all types of suitable recharging infrastructure may fall short of being comprehensive/evenly distributed at EU level. Also, the NPFs feature very different ambition levels across the MS in terms of projected future deployment and their corresponding infrastructure. Future estimates are lower than what was estimated in the Impact Assessment for the Directive: even considering a low ambition scenario, very few NPFs define sufficient corresponding targets. This leads to the risk of falling short of the publicly accessible charging points/fuelling stations required in the EU; and to market fragmentation at EU level and within certain MS

6. Are there other aspects you would like to underline regarding the functioning and/or impact of Directive 2014/94/EU? Are there issues that could be simplified? 1000 character(s) maximum

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Policies

This section aims at identifying potential policy measures to overcome identified problems related to the uptake of alternative fuels.

1. In your opinion, how important is it to revise the following parts of the Alternative Fuels Infrastructure Directive?

	Very important	Important	Less important	Not important	I don't know
Scope with respect to fuels addressed in the directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Scope with respect to transport modes addressed in the directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on ensuring an appropriate infrastructure coverage	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on monitoring and reporting	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on interoperability and user information	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on technical specifications	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on market access	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on interlinkages between the electric vehicles and their infrastructure and electricity markets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Targets to achieve a coherent network

At present, Member States are obliged to establish targets for the roll out of alternative fuels infrastructure through their national policy frameworks. However, those national targets are being set without using a common methodology.

2. In your view, how useful are mandatory deployment targets for Member States that are derived by using a common methodology to ensure a coherent minimum alternative fuels infrastructure roll out in the following areas:

	Very useful	Useful	Less useful	Not useful	No opinion
Electricity for cars & vans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electricity for heavy duty vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electricity for busses	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Very useful	Useful	Less useful	Not useful	No opinion
Electricity for inland waterway	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electricity for short-sea shipping	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hydrogen for cars & vans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hydrogen for heavy duty vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hydrogen for inland waterway	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hydrogen for short-sea shipping	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
CNG for cars & vans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LNG for heavy duty vehicles	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LNG for inland navigation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LNG for maritime vessels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On shore power supply at inland waterway ports	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On shore power supply at maritime ports	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hydrogen for rail	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electricity for aviation ground movement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electricity for port service provisions (pilotage, towage, cargo handling equipment)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer. 1000 character(s) maximum

Renewable/low-carbon electricity, hydrogen, and synthetic fuels are key fuels able to contribute to the decarbonisation of the transport sector. Proper infrastructures and targets should be in place to favour uptake of these solutions. As highlighted in a previous answer, the infrastructure for BEVs and FCEVs needs to be rolled out. For synthetic fuels from Power-to-Gas/Power-to-Liquid, although parts of the infrastructure may already exist, availability and access to e.g. CNG/LNG filling stations is still a key issue.

Reply to questions 3-10 only in case you believe that mandatory deployment targets are useful for at least some of the above mentioned areas.

3. In your view, should such mandatory targets be applicable throughout the whole transport network or only for specific parts of it?

- Applicable to the TEN-T core network (including the most important transport connections and nodes in the EU represented by the core network corridors (railway lines,

roads, inland waterways, maritime shipping routes, ports, airports and railroad terminals)

- Applicable to the TEN-T core and comprehensive network (covering important transport connections and nodes in all EU regions)
- Applicable throughout the whole transport network
- Other (please specify)

Please specify

The Comprehensive Network is a critical point that will need to be addressed quite urgently by the revised legislation, fostering zero emission vehicles uptake also in regions not covered by the Core Network, hence bridging the gap in terms of social and economic disparity.

4. In your view, who should set mandatory deployment targets?

- Member States under national law but following a common European methodology set out in EU legislation
- European legislation to set binding targets for Member States following a common methodology
- Other (please specify)

5. In your view, which power should be required in case of mandatory targets for publicly accessible recharging infrastructure for passenger cars and light duty vehicles along the TEN-T network?

- 50 kW
- 100 kW
- 150 kW
- 350 kW
- Other (please specify)

Please specify

It is important to underline that minimum requirements may vary according to the different environments – urban environments may have different, possibly lower requirements than peri-urban environments and secondary roads; or primary roads and highways.

6. In your view, which power should be required in case of mandatory targets for publicly accessible recharging infrastructure for heavy duty vehicles along the TEN-T network?

- 350 kW
- 1000 kW
- >1000 kW
- Other (please specify)

Please specify

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7. In your view, which power should in case of mandatory requirements shall apply for onshore power supply in maritime ports of the TEN-T network?

- >100 kW
- >500 kW
- >1 MW
- Other (please specify)

>100 kW for what types of vessels?

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>500 kW for what types of vessels?

/

>1 MW for what types of vessels?

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Please specify

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8. In your view, which alternative fuel should – in case of mandatory targets – port service providers (pilotage, towage, cargo handling equipment) have to offer in ports of the TEN-T network?

- Electricity
- Hydrogen
- LNG

- CNG
- LPG
- Other (please specify)
- Any of the above, chosen freely by the port service provider

Please specify

The Alternative Fuels Infrastructure (AFI) Directive – or, as EASE will suggest later, a new AFI Regulation – should focus mainly on new emerging transport means, mainly BEVs and FCEVs, and support synthetic fuels (which can be made based on methanised renewable hydrogen from power-to-gas-to-fuels processes) such as synthetic LNG and CNG and methanol, coherently with e.g. REDII. The infrastructure for BEVs and FCEVs needs to be rolled out. For synthetic fuels, e.g. CNG/LNG and methanol, although parts of the infrastructure may exist already, availability and access to filling stations is still a key issue.

9. In your view, which power should – in case of mandatory targets – be required for recharging infrastructure for inland waterways vessels along the TEN-T network?

- 350 kW
- 1000 kW
- >1000 kW
- Battery swapping technology
- Other (please specify)

Please specify

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10. In your view, how could the compliance with mandatory targets be best monitored?

- Through reporting of public authorities in Member States to the EU
- Through direct monitoring of infrastructure roll out at EU level
- Other (please specify)

Please specify

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Other deployment measures for publicly accessible and non publicly accessible recharging points

11. Do you believe that owners of an electric vehicle should be entitled to have a re-charging point installed in their neighborhood?

- Yes
- No
- No opinion

12. How useful would you consider the following measures to facilitate and accelerate the development of recharging points not accessible to the public (such as private re-charging points in apartment buildings, offices, etc.)?

	Very useful	Useful	Rather not useful	Not useful	No opinion
Mandatory installation of recharging points in car parks of non-residential buildings (e.g. office buildings) that go beyond existing provisions in the Energy Efficiency for Buildings Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory installation of recharging points in apartment buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Right for individuals who rent an apartment/garage to install recharging points	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Right for individuals who own an apartment to install recharging points in apartment buildings	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment. 1000 character(s) maximum

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Interoperability/Technical Specifications

In order to ensure technical interoperability between vehicles/vessels and the infrastructure throughout Europe, the directive already sets certain technical specifications, e.g. with respect to socket outlets at recharging points, and enables the Commission to adopt secondary legislation with respect to technical specifications.

13. Do you believe that further mandatory technical requirements/standards are required to ensure full interoperability of infrastructure and services across Europe?

- Yes
- No
- No opinion

14. If "yes" to the previous question, in which areas would technical requirements/ standards be needed?

- Physical interfaces between vehicles/vessels and the infrastructure
- Identification and authentication of electric vehicles
- E-roaming protocols
- Interface to energy networks and / or building management systems to enable electric vehicles to provide electricity back to the grid
- Communication security
- Others
- No opinion

Please explain briefly your answer. 1000 character(s) maximum.

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User Information

15. In your view, should EU legislation ensure that certain information on alternative fuels infrastructure is made available to the user by digital means (e.g. through an app)?

- Yes
- No
- No opinion

16. If you replied yes to the previous question, which information should be provided?

- Location of re-charging/re-fueling points
- Operator of recharging/refueling points
- Opening hours Refueling / recharging prices
- Type of re-charging/re-fueling points (e.g. max. power of a recharging point, installed capacity of a recharging station, available connector type, e.g. CCS))
- Compatibility of re-charging/re-fueling points with the user's engine/car model
- Comparable (e.g. €/100km) refueling / recharging prices of different fuels
- Real Time Availability of recharging/refueling points
- Accessibility for persons with disabilities
- Other (please specify)

Please specify

It is paramount that end-users can easily access information. At the same time, it is important to design legislation able to avoid putting excessive burdens on operators of recharging/refuelling points - it may lead to disproportionate costs for them.

17. In your view, should the EU legislation ensure that certain information is made available to the user by physical means?

- Yes
- No
- No opinion

18. If you replied yes to the previous question, which physical means are you referring to?

- Road signs on highways
- Road signs on all streets
- Other (please specify)

Please specify

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19. In your view, how often are the prices charged at publicly accessible re-charging points clearly identifiable?

- Always
- Sometimes
- Seldom
- Never
- I don't know

20. Currently many different concepts and price components exist to price electric recharging services, e.g. initial fee, time fee, kWh fee, possibly roaming fee. Should there be a harmonization of the display of recharging fees required at EU level?

- Yes
- No
- I don't know

21. In your view, where should information on the refueling/re-charging price be displayed?

- At the refueling/re-charging station
- In every app that provides information on charging infrastructure
- In every vehicle information system
- Other (please specify)

Please specify

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Semi Public Chargers

Currently the Directive only distinguishes between publicly accessible and non-publicly accessible recharging infrastructure (private infrastructure located in apartment buildings or offices). However, some publicly accessible infrastructure is not located on public grounds along roads but on private property, e.g. chargers on supermarket parking lots, hotels or private car parks. It is being debated if such “semi public” infrastructure would need to be defined separately in a revision of the Directive. On that basis “semi public” infrastructure could be exempted from fulfilling some minimum requirements applicable to publicly accessible infrastructure.

22. On the possible exemption of recharging points from certain minimum requirements, to what extent, do you agree with the following statements?

	Strongly agree	Agree	Rather disagree	Strongly disagree	No opinion
Re-charging points that are located on private properties to which access can be restricted by the owner (such as charging points located on supermarket car parks, hotels, etc.) should be exempted from certain minimum requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Recharging points where the recharging service is free of charge should be exempted from certain minimum requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
All publicly accessible recharging points should fulfil all minimum requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Are there any other re-charging points that should be exempted from certain minimum requirements? Please explain. 500 character(s) maximum

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23. In case you believe that some recharging points should be exempted from fulfilling some minimum requirements, which requirements should those be?

- Location and other static information
- Availability, and other dynamic information
- Information on re-charging prices
- Ad hoc payment functions
- Interoperability requirements with regards to the physical interface
- Interoperability requirements with regards to communication protocols

Other (please specify)

Please specify

For semi public charging points (private charging points of public access), interoperability requirements should be ensured.

Market Access (e-mobility markets)

24. In your view, are there currently problems that e-mobility service providers face when they want to offer their services on charging points that are operated by a third party?

- Yes
- No
- I don't know

If you answered yes, please explain. 500 character(s) maximum

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25. In your view, should policy measures be introduced at the EU level to provide for the following as regards to market access for service providers?

- All e-mobility service providers should be allowed to offer their services at any charge-point free of charge
- All e-mobility service providers should be allowed to offer their services at any charge-point for a fee set by the legislator
- All e-mobility service providers should be allowed to offer their services at any charge-point at a non-discriminatory price set by the charge point operator
- Other measures (please specify)
- No additional regulation required at the EU level
- No opinion

Please specify

Different EU member states may have different approaches on this matter, following different models (e.g. liberalised vs DSO); therefore, policy measures should not be introduced at the EU level.

Integration of electro-mobility into the electricity system

26. In your view, which policy measures listed below are essential to ensure that the efficient integration of electro mobility into the electricity system is possible and fully aligned with the electricity market rules?

- Mandatory requirement for all publicly accessible recharging points (existing and new) to be equipped with smart metering systems
- Mandatory requirement for newly installed publicly accessible recharging points to be equipped with smart metering systems
- Mandatory requirement for newly installed publicly accessible recharging points to have smart charging functionalities, such as the ability to react to price and grid signals, respond to local renewable electricity generation and the ability to be controlled
- Mandatory requirements for charging points not accessible to the public to have smart charging functionalities
- Mandatory interoperability requirements for the communication between the electric vehicle and the recharging point to enable smart charging
- Mandatory interoperability requirements for the communication between the electric vehicle and the recharging point to enable vehicle to grid services
- Ensure that necessary battery data is available to authorized third parties for the provision of smart charging services and vehicle to grid services
- None
- Other (please specify)

Please specify

Enabling Vehicle-to-Grid solutions should be a priority – they allow for sector integration and significantly contribute to decarbonisation. Still, when setting mandatory interoperability requirements, it is important to properly assess how to avoid too strict requirements that could hamper the deployment of Vehicle-to-Grid solutions.

Impacts

The Inception Impact Assessment discusses possible impacts of potential measures for the review of this Directive. Those measures relate to a) expanding the scope of the directive to other transport modes, b) strengthening requirements on Member States to ensure the deployment of an adequate number of recharging and refuelling stations and c) ensuring user friendliness and interoperability. Please indicate your view on the impact of such measures aimed at accelerating the deployment of interoperable infrastructure and the uptake of alternative fuels in the following questions.

27. To what extent do you agree with the following statements on the likely economic impacts of measures outlined in the Inception Impact Assessment?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
They will lead to growth and jobs in in the production of vehicles/vessels and manufacturers of alternative fuels infrastructure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
They will contribute to a bigger market in the EU for alternative fuels	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
They will improve international competitiveness of European industry	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
They will have a positive impact on research and innovation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
They will initially put a strain on investment budgets of citizens and transport operators due to higher purchase cost of alternatively fuelled vehicles	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
They will reduce overall expenditures of citizens and transport operators due to low maintenance cost and over time reduced investment cost	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

28. To what extent do you agree to the following statements on environmental impacts of measures outlined in the Inception Impact Assessment?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
They will lead to less emissions of CO2 from vehicle/vessel fleets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
They will lead to less emissions of air pollutants from vehicle/vessel fleets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
They will have positive effects on human health	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

29. To what extent do you agree to the following statements on administrative burden and simplification?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
Expanding the scope of the Directive will lead to an increased administrative burden	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Replacing the National Policy Frameworks with mandatory targets will increase administrative burden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Introducing more detailed requirements on interoperability and user information will increase administrative burden	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

30. Do you have any comment on other potential impacts (not mentioned above) of the possible policy measures?

1000 character(s) maximum

/

Relevance of other action at European level

31. To what extent do you agree with following statements?

	Fully agree	Agree	Rather disagree	Completely disagree	No opinion
The objectives of the revision of the Directive could be better accomplished through deployment of non-legislative tools based on guidance or recommendations by the Commission	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The objectives could be achieved better if policy measures discussed for the revision of the Directive were implemented through an Alternative Fuels Infrastructure Regulation that would replace the current Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer. 1000 character(s) maximum

Moving from a Directive to a Regulation, able to set binding targets with binding legal force and direct effect throughout every EU member state, is key.

Final remarks

32. Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report.

EASE, *Energy Storage and the Alternative Fuels Infrastructure Directive*, 2020. <https://ease-storage.eu/es-alternative-fuels-infrastructure/>

EASE, *Energy Storage: A Key Enabler for the Decarbonisation of the Transport Sector*, 2019. <https://ease-storage.eu/energy-storage-transport-sector/>

EASE, *Power-to-Gas Business Cases: Revenue Streams, Economic and Regulatory Barriers, Business Opportunities*, 2020. <https://ease-storage.eu/power-to-gas-business-cases-revenue-streams-economic-and-regulatory-barriers-business-opportunities/>

EASE, *EASE Recommendations on Sectoral Integration Through Power-to-Gas/Power-to-Liquid*, 2017. https://ease-storage.eu/wp-content/uploads/2017/05/2017.05.15_EASE-Recommendations-PtG-PtL_final.pdf

About EASE

The European Association for Storage of Energy (EASE) is the voice of the energy storage community, actively promoting the use of energy storage in Europe and worldwide. It supports the deployment of energy storage as an indispensable instrument within the framework of the European energy and climate policy to deliver services to, and improve the flexibility of, the European energy system. EASE seeks to build a European platform for sharing and disseminating energy storage-related information and supports the transition towards a sustainable, flexible and stable energy system in Europe.

For more information please visit www.ease-storage.eu

Disclaimer

This response was elaborated by EASE and reflects a consolidated view of its members from an energy storage point of view. Individual EASE members may adopt different positions on certain topics from their corporate standpoint.

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