E.DSO reaction to the Parliament position on the Alternative Fuels Infrastructure Regulation (AFIR).

The relevance of AFIR for Distribution System Operators (DSOs):

The efforts to move forward with the electrification strategy in the transport sector in order to achieve necessary emission reductions and to meet European climate neutrality targets are making DSOs more and more the backbone of an increasingly integrated, decentralized and digitalized energy system. New charging points for electrical vehicles will widely be connected to the distribution grids, increasing the need for operational and strategical planning to guarantee the functionality of the grid, as well as security of supply and affordability for costumers.

This paper presents the **main recommendations** of DSOs in view of the recently adopted **main position of the European Parliament** concerning the proposal of the Commission to recast the Directive on the deployment of alternative fuels infrastructure.

The table below analysis the main position of the Parliament with the following symbols illustrating E.DSO's **support** , **ideas for improvement** or **rejection**

AMENDMENTS	E.DSO POSITION
Amendments 8, 10, 11, 21, 24 and 76 of the Parliament position include the call on Member States to ensure full coverage along the Unions main road networks, including in and to the outermost regions and islands of the Union. Where economically disproportionate cost occur, **Member States are incentivized to consider off grid infrastructure.**	E.DSO acknowledges the attempt to ensure full coverage of all Unions main roads, can however, not support the incentive to consider off grid infrastructure solutions as it **does not bring any added value to the energy system and risks overriding DSOs core mission of providing a secure electricity supply and quality of service.**
The Parliament relied on the Commission's proposal regarding the definition of **'smart recharging'**. (*Article 2*)	E.DSO **welcomes the definition of smart metering included in Recital (20).** To underline the importance of smart metering as **backbone of system integration** which relies on data collection and management, we believe it should equally be included directly in the **definitions under Article 2 (59) about 'smart recharging'.**

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AMENDMENTS	E.DSO POSITION
Amendment 85 in the Parliament main position adds the obligation regarding "a sufficient number of publicly accessible recharging stations for light duty vehicles is **deployed on public roads in residential areas where vehicles typically park for extended periods of time**;" (*Article 3*).	E.DSO welcomes the **limited cost impact** on consumers and the implicated **benefits for the grid.** We thus advocate for the **inclusion of this point in the final text**.
Amendments 86 and 116 in the Parliament position include a new subparagraph to ensure that publicly accessible recharging stations for light and heavy-duty vehicles are enabled for smart ***and*** bi-directional recharging (*Article 3*).	**The difference between bi-directional recharging and smart recharging should be clear**. While smart recharging refers to a **recharging operation in which the intensity of electricity delivered to the battery is adjusted in real-time**, based on information received through electronic communication (*Article 2 (59)*), bi-directional recharging means a smart **recharging operation where the direction of the electricity flow may be reversed**, allowing that electricity flows from the battery to the recharging point it is connected to (*Article 2 (9)*). The addition to Article 3 should thus replace the '***and***' with '***where appropriate***' or '***where economically efficient***' to clarify that bi-directional charging is not always the most efficient solution.
Several amendments, such as no. 87 in the Parliament position explicitly mention the need to take into consideration **grid capacity** (*e.g. Rec. 32/ Am. 37; Rec. 32a/Am. 38; Art.4/ Am. 122; Art. 10/ Am. 169; Art. 13/ Ame. 199*).	E.DSO supports the **importance grid capacity** was given throughout the Parliament's position.
Amendment 191 of the Parliament position obliges Member States to add a **6-month deadline** between the initial application and actual deployment with regards to **planning, permitting and procuring** of alternative fuels infrastructure in their national policy frameworks (*Article 13*).	The **6-months period set in the regulation is prescriptive and does not give enough flexibility** for all stakeholders acting at the end of the value chain. We therefore support the alignment of the Parliament's position with the Council's General Approach (GA), which leaves it to Membre States to decide **where such measures are suitable**.

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AMENDMENTS	E.DSO POSITION
Amendment 210 of the Parliament position refers to the inclusion of **a comprehensive investment plan** in the publicly available draft national policy framework (*Article* 13).	E.DSO supports the ambition to render national policy frameworks more **transparent** with respect to investment planning.
Amendment 216 of the Parliament position mandates **National Regulatory Authority (NRAs) for the evaluation of flexibility potential** and establishes that the evaluation must be **renewed annually** (*Article* 14).	**DSOs are the more relevant stakeholders to assess the flexibility needs** as stated in **Article 32** of the **Electricity Directive (EU) 2019/944**. The evaluation of EV contribution should be done **coherently with the Clean Energy Package** which already **set a requirement for DSOs** to conduct a periodical evaluation of flexibility needs in their own network development plans while consulting all interested parties. E.DSO considers a yearly evaluation to be an unproportionate bureaucratic burden and supports therefore the Council's GA setting a periodical assessment every **four years**.