



E.DSO Reaction to MEP Ismail Ertug's Draft Report on the Regulation on Alternative Fuels Infrastructure

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Introduction

E.DSO widely welcomes the Parliament's progress on the Regulation on Alternative Fuels Infrastructure (AFIR) in view of the publication of the draft report (14.02.2021 under reference PE719.568) of TRAN's rapporteur, MEP Ismail Ertug (S&D, DE). We appreciate major improvements to the file including a wider recognition of electricity networks for the electrification of transport. The strengthened framework for the application of the Energy Efficiency First Principle is also a step forward. The amendments to the regime on provision of data and the suggested development of a European access point demonstrate an ambitious view about system integration. E.DSO would, however, like to propose several recommendations based on [our position paper](#) how to make the AFIR more fit for purpose from the perspective of the DSO industry.

E.DSO recommendations on key elements

Grid capacity. E.DSO appreciates the recognition of networks for the uptake of electric vehicles (EVs) as portrayed in the **amendment to Recital 32 of the AFIR report**. The grid, and especially the distribution grid, will be central for the electrification of transport. Nevertheless, we believe that the draft report does not go sufficiently far in building a solid regulatory basis for this transition. The study, [Connecting the Dots](#), which E.DSO conducted with Eurelectric and Deloitte, identifies that **distribution grids in Europe alone will need 375-425 bln EUR of investment by 2030** in order to sustain the energy transition, incl. the electrification of transport. For this reason, AFIR should mandate Member States to encourage investments in the capacity of distribution networks as far as this is necessary and proportional. In this regard, the proposal of the ITRE Committee to create a national policy framework for the development of a resilient grid infrastructure which relies on smart solutions and local system integration is in line with what is necessary to facilitate electrified transport.¹

Definition of smart charging. This definition in **Article 2** must be expanded to include smart metering systems as these are the backbone of system integration which relies on data collection and management.

Evaluation of flexibility potential. The requirement for NRAs to evaluate the flexibility potential of electric vehicles should be designed coherently with the Electricity Market Directive which already foresees an exhaustive regime for this evaluation. According to this regime DSOs are responsible for ensuring a non-discriminatory participation into the market of all flexibility providers. **Article 14 (3)** should recognize the position of DSOs in the evaluation of flexibility potential. In this regard, the amendments suggested by the ITRE Committee offer a more consistent framework reflecting the Electricity Market Directive.²

Conclusion

E.DSO looks forward to a continued legislative dialogue on the RED and is open to participate in discussions about its recommendations. DSOs have an important role to play in facilitating the energy transition and we can provide a strong perspective how the industry can be equipped for the challenges ahead.

¹ Amendments 579 and 601 to MEP Michael Bloss' Draft Opinion (document reference PE704.872v01-00).

² Amendments 622-624 to MEP Michael Bloss' Draft Opinion (document reference PE704.872v01-00).