

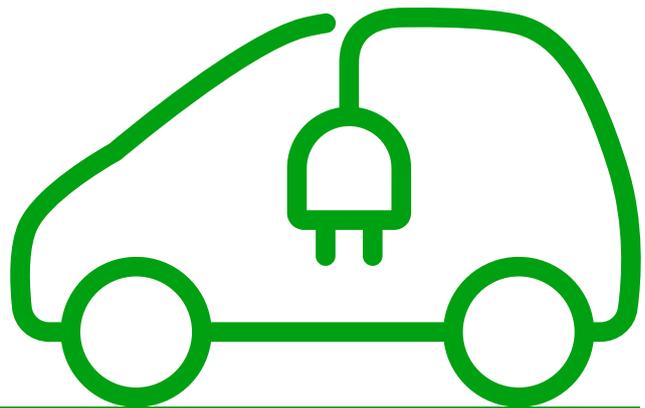
ALTERNATIVE FUELS INFRASTRUCTURE

E.DSO | FIT FOR 55 | POSITION PAPER

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E.DSO welcomes the revision of the EU's approach to Alternative Fuels Infrastructure and the FF55 package as a tool to equip the EU's economy for climate neutrality. DSOs will be key actors for the achievement of the objectives of the regulation (AFIR) as the charging infrastructure for electric vehicles (EVs) as well as other modes of transport will be connected to their distribution grids. It should also be considered that DSOs are allowed to own, develop, manage, or operate recharging points for EVs subject to certain conditions and Member State decision (Article 33 (3) of Directive 2019/944/EU).

E.DSO supports the introduction of mandatory MS targets for the deployment of EV charging infrastructure as it will enable the electrification of the transport sector. E.DSO also welcomes the role that the proposal attributes to electricity DSOs in the management of grid stability and flexibility, in the deployment of grid extensions and in reporting on bidirectional charging as an instrument for integration of Renewable Energy Sources.



Our Recommendations

Smart Meters

Since most of the EV chargers are connected to the distribution grid and will withdraw from and/or inject electricity to the grid, DSOs will be at the centre of such operations. Smart meters, when already deployed by Member States, are relevant tools for this activity as they give secure and reliable data and facilitate smart charging as well as the participation of EV owners in the provision of flexibility services. Smart meters' contribution should be concretely acknowledged as an integral part of smart charging operation and included in its definition in **Article 2**.



Evaluation of Flexibility Needs

Electric mobility and the uptake of EV charging will greatly contribute to system integration by providing demand side flexibility to the energy system (as mentioned in the Energy System Integration Strategy). E.DSO's members fully agree with this statement and will substantially contribute to the redaction of a future network code on Demand side flexibility through the newly established EU DSO Entity.

Nevertheless, **Article 14 (3)** confers large powers to NRAs in assessing the contribution of EVs to the flexibility of the energy system. 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.



Technical Specifications

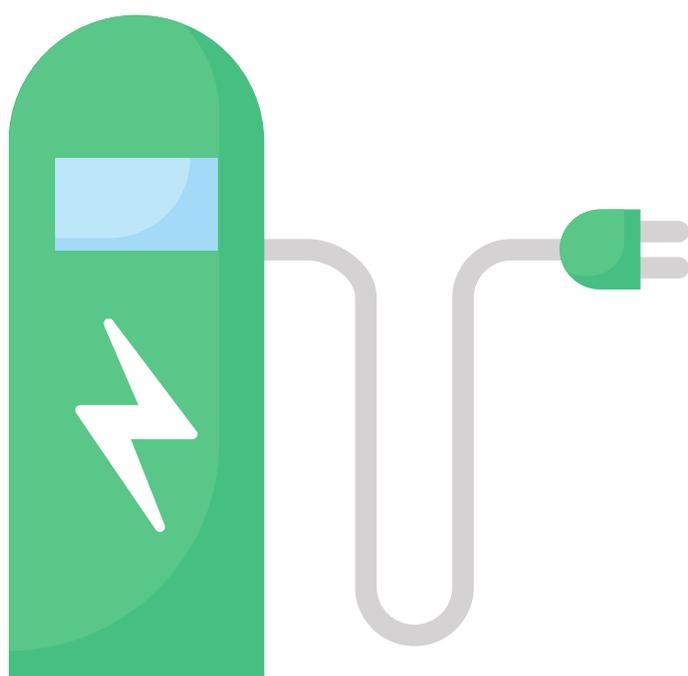
Concerning **Article 19 (6) and Annex II (2)**, DSOs must be associated to the definition of technical specifications on communication with the grid. DSOs are central to this process and will be directly impacted by the development of the technical specifications. For this reason, they should be included in their definition in alignment with the best practises for development of standards.

Reinforcement of Grid Capacity

While the proposal acknowledges the role of DSOs in the electrification of mobility and increases their responsibility, it does not account sufficiently for the need to reinforce their distribution grid to achieve the regulation's objectives. This is despite the proposal's *Impact Assessment* which states that “[DSOs] will have to invest into grid stability and flexibility and – where necessary - into grid extensions” (p. 108, part 1/2).

This approach, to emphasise the need for investment in grid connectivity and not in capacity, is upheld also in the Strategic rollout plan for the deployment of alternative fuels infrastructure. E.DSO invites the Commission to change its view on this matter as the study “Connecting the Dots” carried out by E.DSO and Deloitte suggests that in Europe DSOs only will need 375-425 bln EUR of investment in 2020-2030 in order to research, innovate and deploy new technologies to guarantee the safest and most reliable network for all customers.

It would be more appropriate to adopt a similar approach to the one E.DSO recommends about the Renewable Energy Directive. In this way Member States should be mandated to facilitate the electrification of transport by encouraging investments in the capacity of distribution networks as far as this is necessary and proportional.



E.DSO is a European association gathering leading electricity distribution system operators (DSOs) shaping smart grids for your future.

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