
From: Josef Breinesberger [josef.breinesberger@agrarplus.at]
Sent: mardi 14 juin 2011 14:19
To: ENER ACCOUNTING RES TRANSPORT
Subject: Public consultation, reply from an NON-registered organisation

Dear Ladies and Gentlemen!

I got the information about your consultation today, so I beg your pardon that I am answering very late.

Section A:

- 1) not significant
- 2) none, because if the cars are loaded not always on the own station of the car-owner, and this will happen if the distances of batteries don't get a longer range, the mix of different electricity sources is standard.
- 3) + 4) In which way would you count different electricity on different loadstations? The statistic is always wrong because the renewable electricity Production and consum is counted by different offices. Which form you will really count doubled?

Section B:

- 1) none are likely to be significant by 2020, because we don't have solutions in the market which would be able to get greater market shares by cars or lorries.

Section C:

- 1) Important, along with other policies/developments
- 2) When the methane comes with a tradeable certificate showing that that amount of biomethane was generated
- 3) None, it only changes the accounting method

The production of biomethane belongs in the moment on an interesting feed in tariff for electricity. The natural gas price is to low, that the costs for the production of biomethane for use as fuel can be covered. So the existing plants are only demoplants, which shows, that this possibility is possible. For getting higher market shares more different general requiremntents are necessary.

- 4) additional statistics collection in all member states

Section D:

- 1) no
- 2) Yes, because in the case of trade and the necessary mass balance for the sustainability, and also for the tax-systems of the member states it necessary to get not to much differences in the systems, otherwise the companies wouldn't understand why they should make different mass balances. For example the question of the mass density of different biodiesel sources: from coconut oil 874,85 g/l (15° C) and soy bean oil – mid oleic 892,69 g/l (15° C).

With best regards

Josef Breinesberger

Dipl.-Päd. Ing. Josef Breinesberger
AGRAR PLUS GmbH and also Bundesverband Pflanzenöl Austria
Bräuhausgasse 3, A-3100 St. Pölten
Telefon: 0043(0)2742 352234
Telefax: 0043(0)2742 352234-4
email: josef.breinesberger@agrarplus.at
Internet: www.agrarplus.at
www.pflanzenoel-austria.at
Firmenbuchnr.: FN 93770 y
Firmenbuchgericht: Landesgericht St. Pölten

