
From: Felix Creutzig [creutzig@mailbox.tu-berlin.de]
Sent: samedi 14 mai 2011 2:36
To: ENER ACCOUNTING RES TRANSPORT
Subject: Public consultation, reply from a citizen
Attachments: CreutzigMcGlynnMinxEdenhofer2011.pdf; FlachslanBrunnerEdenhoferCreutzig2011.pdf

Dear Madame/Sir,

I would like to respond to some of the questions on the accounting of RE for the 10% 2020 transport target.

Section A:

- The 10% has a non-significant effect on electric-car development and deployment (dominated by other policies/incentives)
- Electricity for electric cars, in my opinion, should be accounted as 100% renewables, if provided by a 100% renewable energy utility. Reason: this minimizes shifting/shuffling effects compared to when the certificate option is chosen.
- The option mentioned above will have an effect on additional RE deployment.
- Additional statistical burden.

Section B:

- biomethane (and natural gas) by steam reforming
- I don't know how to best calculate the corresponding contribution

I would like to point out that the 10%-2020 target is likely to be net harmful in inducing global unwanted land use change (e.g. deforestation) via general equilibrium effects. The current sustainability accounting, to my best knowledge, is not sufficient to deal with indirect land use change.

I recommend to establish a level playing field across all transport fuels by a) regulating cars according to ambitious MJ/km values; b) include all transport-induced GHG emissions into the EU ETS.

The two papers attached try to clarify the claim.

Best regards,
Felix Creutzig

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