



14 June 2011

Ministry of Enterprise, Energy and
Communications Sweden

**Sweden's response to the public consultation on accounting methods and
conditions for the 10% renewable energy in transport target**

Sweden's answers in bold.

Section A: According to the National Renewable Energy Action Plans, Member States estimate that the contribution of renewable electricity will by 2020 account for approximately 1% of energy consumed in transport: 0.8% in non-road transport (mainly in trains) and 0.2% in road transport, including electric cars, trolleybuses, etc. Given that electricity is generated from both renewable as well as non-renewable sources,

1. how do you value the impact of the 10% target for renewable energy in transport by 2020 on the development of electric vehicles?

- **Not significant**
- *Significant, but other policies/developments will be of more importance*
- *Important, along with other policies/developments*
- *A key driver*

Kommentar: Endast 0,2 % av energianvändningen utgörs av förnybar el i vägfordon år 2020 enligt NREAP, vilket tyder på att de flesta länder inte räknar med att el kommer slå igenom i större utsträckning innan 2020. Elfordon kommer därmed inte utgöra en så stor del av uppfyllelsen av 10 %-målet.

2. under what condition do you think it would be justified to count the whole amount of electricity in electric vehicles as renewable?

- **None**
- *When the electricity is produced fully from renewable energy and without connection to the electricity grid*
- *When the electricity comes with a tradable certificate showing that that amount of renewable electricity was generated*
- *When there is a supply contract showing that that amount of renewable electricity was generated*

- *When there is evidence on a Member State level that the development of electric vehicles has led to that amount of additional renewable electricity generation*
- *Other (please specify):*

Kommentar: Nuvarande sätt att beräkna andel förnybar el är tillräckligt bra (dvs. att utgå från inhemsk elmixalternativt EU-snitt). Det blir sannolikt en mycket tung administrativ börda att upprätta ett system som ska ta hänsyn till det faktiska ursprunget på elen. Dessutom är nyttan med ett sådant system begränsat med tanke på hur liten del av 10 %-målet som förväntas uppnås genom el i vägfordon.

Troligtvis blir det en tillräckligt svår uppgift att överhuvudtaget samla in statistik för hur mycket el som elfordonen använder. Det är viktigt att Eurostat utvecklar en metodik för mätning av elanvändning i vägfordon.

3. *what benefits do you expect the option you selected under (2) will have:*

- *Additional renewable electricity generation*
- *Faster development of electric vehicles*
- *Other (please specify):*
- **None, it only changes the accounting method**

4. *what costs in terms of administrative burden do you expect the implementation of the option you selected under (2) will have:*

- *Additional statistics collection in all Member States*
- *Generating additional information on the basis of existing statistics*
- *Other (please specify):*
- **None**

Section B: Hydrogen from renewable sources in transport

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Section C: Biomethane via the natural gas grid in transport

According to the National Renewable Energy Action Plans, Member States estimate that biofuels other than first and second generation bioethanol and biodiesel will by 2020 account for approximately 0.2% of energy consumed in transport, part or all of which may be biomethane. Given that methane in the gas grid originates mostly from non-renewable sources (natural gas),

1. *how do you value the impact of the 10% target for renewable energy in transport by 2020 on the development of methane vehicles fuelled by methane from the gas grid?*

- *Not significant*
- **Significant, but other policies/developments will be of more importance**
- *Important, along with other policies/developments*
- *A key driver*

Kommentar: I Sverige kommer biogas att stå för en relativt stor del av uppfyllelsen av 10 %-målet fram till år 2020 enligt den prognos som ligger till grund för Sveriges NREAP. Det finns flera anledningar till satsningar på biogasproduktion och biogasfordon, inte bara det faktum att det finns ett förnybartmål. Däremot är det viktigt att 10 % målet inkluderar biogas så att Sverige kan tillgodoräkna sig de satsningar som gjorts.

2. under what condition do you think it would be justified to count the whole amount of methane extracted from the gas grid for the use in vehicles as renewable?

- *None, until the time that all methane injected into the gas grid concerned is originating from renewable sources*
- **When the methane comes with a tradable certificate showing that that amount of biomethane was generated**
- **When there is a supply contract showing that that amount of biomethane was generated**
- *When there is evidence on a Member State level that the development of methane vehicles has led to that amount of additional biomethane generation*
- *Other (please specify):*

Kommentar: I Sverige finns redan idag ett system för detta i skattelagstiftningen eftersom biogas beskattas annorlunda än naturgas. Skattefriheten för biogasen följer gasen till kund via avtal. Den skattemässiga bedömningen sker via avtal istället för via faktisk leverans. Detta motsvarar ”supply contract” ovan. ”Tradable certificates” skulle kunna vara en alternativ metod för andra länder inom EU.

3. what benefits do you expect the option you selected under (2) will have:

- **Additional biomethane generation**
- *Faster development of methane vehicles*
- *Other (please specify):*
- *None, it only changes the accounting method*

Kommentar: I Sverige kan möjligheten att tillgodoräkna sig den biogas som matas in i naturgasnätet ge incitament att producera mer biogas. (Det krävs dock kompletterande nationella styrmedel, dvs. 10 %-målet leder inte direkt till ökad biogasproduktion).

4. what costs in terms of administrative burden do you expect the implementation of the option you selected under (2) will have:

- *Additional statistics collection in all Member States*
- *Generating additional information on the basis of existing statistics*
- **Other (please specify):**
- *None*

Kommentar: Det kommer behövas ett administrativt system för hantering av certifikaten alt. kontrakten. Vad gäller biogasstatistik så bör den kunna samlas in inom ramen för hållbarhetskriterierna.

Section D: Energy content of biofuels

According to the National Renewable Energy Action Plans, Member States estimate that the contribution of biofuels will be approximately 9.5% of energy consumed in transport, most of which is expected to be biodiesel and bioethanol.

1. Do you think additional types of biofuels need to be listed in Annex III of the Directive? If yes, which ones and could you provide values?

Kommentar: Nej, däremot saknas värden för flytande biobränslen utöver biodrivmedel.

2. Do you think more precision in terms of decimals is necessary in the values in the Annex? If yes, could you provide such values?

Kommentar: Ja, en decimal hade gjort beräkningarna mer exakta. I Sveriges energistatistik används följande decimaler för biodrivmedel:
Etanol: 21,2 MJ/l
Biodiesel/FAME: 33,0 MJ/l