

Brussels, 14.06.2011

Public Consultation on:
Accounting methods and conditions for the 10% renewable energy in
transport target – and on the need for additional types of biofuels being listed
in Annex III of the Renewable Energy Directive”

On behalf of Central Europe Energy Partners AISBL (CEEP) we are sending in the frame of public consultationsour position on the document “Public consultation on accounting methods and conditions for the 10% renewable energy in transport target – and on the need for additional types of biofuels being listed in Annex III of the Renewable Energy Directive”

Our answers are as follows:

Section A: Electricity from renewable sources in transport.

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

- Significant, but other policies/developments will be of more importance

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

- When the electricity comes with a tradable certificate showing that that amount of renewable electricity was generated

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

- Additional renewable electricity generation

The introduction of biofuels is costly. Electricity totally classified to calculation might be an interesting alternative. Entities required to achieve an objective may be interested in developing additional sources of renewable energy.

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

- Generating additional information on the basis of existing statistics

Section B: Hydrogen from renewable sources in transport

1. Which are in your view the most likely ways to produce hydrogen from renewable sources (partly or fully) by 2020?

- From biomethane, e.g. by steam reforming/partial oxidation

2. For each option you selected under (2), if it would be used for transport, how would you suggest to calculate its contribution to the 10% target for renewable energy in transport?

To promote this solution (biomethane) double counting should be considered.

Section C: Biomethane via the natural gas grid in transport

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

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?

- When the methane comes with a tradable certificate showing that that amount of biomethane was generated

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

- Additional biomethane generation

Please motivate your answer

The introduction of biofuels is very costly. The biomethane classified to calculation might be an interesting alternative. Entities required to achieve an objective may be interested in developing additional sources of methane production.

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

- Generating additional information on the basis of existing statistics

Section D: Energy content of biofuels

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?

We propose to add to the list a co-hydrogenation (HVO-co-HVO) of vegetable oil. This technology use vegetable oils during the production of diesel as part of raw material. Major European's refineries have the possibility of using this technology. Thus, it will be easier to achieve 10% of energy from renewable sources in transport. As some countries accept HVO and co-HVO technology is questioned, it is suggested to promote expressly both technologies.

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? Please provide references for suggested values

Yes, Biodiesel 37,7 MJ/kg, ON 42,9MJ/kg, Petrol 42,6 MJ/kg

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Central Europe Energy Partners, AISBL (CEEP, AISBL), is an international non-profit association incorporated on the 4th of May, 2010 in Brussels. Its primary mission is to support the integration of the Central Europe Energy Sector within the framework of common EU energy and energy security policy. CEEP members are energy sector companies as well as universities and other research institutions from Central Europe. The purpose of the association is to identify and advocate common problems and their solutions, strengthen the region's energy security and facilitate successful implementation of the EU energy and energy security policy.

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