

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

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SECTION A: Electricity from renewable sources in transport

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

Response: Significant, but other policies/developments will be of more importance.

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

Response: Other (please specify). Condition 4 ("When there is a supply contract showing that the amount of renewable electricity was generated") is the ideal option but the sector also supports condition 3 ("When the electricity comes with a tradable certificate showing that the amount of renewable electricity was generated") as a feasible and acceptable solution. In this case it could also be sensible to suggest a (optional) use of a "Guarantee of Origin" or another means to show the renewable electricity used is additional to what was produced before.

Question 3 - what benefits do you expect the option you selected under (2) will have?

Response - Other (please specify). Option 1 (additional renewable electricity generation) and option 2 (Faster development of electric vehicles) could be two possible benefits expected from the option selected in Question 2. However, it is important to stress that the calculation methodologies described in Question 2 can have two very important effects on the rail sector.

1. It encourages further electrification of the current rail network (around 80% of European railway transport takes place using electric traction while 20% is diesel traction, but around 50% of Europe's rail network is still non-electrified). More electrification can further reduce the already low CO2 emissions from rail, its specific energy consumption, and remove the local air pollution caused by diesel exhaust emissions. Rail operators are also very large electricity customers - in some countries they are the biggest individual consumers of electricity - so their decisions can help move markets and influence decisions on future generating capacity.
2. It encourages more railway operators to use green energy and shift to CO2-free energy sources as it facilitates more renewable and carbon-free electricity coming onto the market.

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

Response - Generating additional information on the basis of existing statistics.

For further information, please contact:

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