From: Marc GILLMANN [marc.gillmann@total.com]
Sent: mercredi 25 mai 2011 17:48
To: ENER ACCOUNTING RES TRANSPORT
Cc: Daniel LE-BRETON; Philippe MARCHAND
Subject: Public consultation, reply from a registered organisation

Vous trouverez ci-joint la réponse de Total, concernant la consultation publique sur la directive 2009/28/CE de promotion des énergies renouvelables :

Vous en souhaitant bonne réception.

Cordialement,

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Section A: Electricity from renewable sources in transport
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%5 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.

2. under what condition do you think it would be justified to count the whole amount of electricity in electric vehicles as renewable?
- None
-Other : A statistical approach based on the electric mix in each Member states during the hours of the most representative charging time during the day (if during peaks of consumption, then additional GHG due to an increased share of coal and natural gas. Nuclear electricity must not be considered as a renewable electricity.

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
Please motivate your answer.
Electric vehicules are not a silver bullet. They must compete with other vehicules on a leveled playing field. The statistical approach suggested here above allows such a fair competition.

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
- Other (please specify): Low (construction of a reference of the electric mix among each member states and/or EU during an average day + statistics on hours of plug-in).

5 This 0.2% counts however with a multiplication factor of 2.5 towards the 10% target - Cf. Article 3(4) of the Directive.

Section B: Hydrogen from renewable sources in transport

According to the National Renewable Energy Action Plans, only one Member State estimates that hydrogen from renewables will be used in transport by 2020.

1. Which are in your view the most likely ways to produce hydrogen from renewable sources (partly or fully) by 2020?
- None are likely to be significant by 2020. Only excess production from natural gas steam reforming

2. For each option you selected under (2), if it would be used for transport, how would Certificates of origin could be a solution since it will remain a niche activity if any.

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 (but more than bioH2)

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 (no way)
- 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): 4th option ("when development of vehicules has led to...") is not acceptable since it can't be proven. Methane has a potential for development and a tradable certificate or supply contracts could foster its development. When Member states have segregated targets, biomethane based certificates should be able to be used for gasoline or diesel objectives according to customer's preference.

3. what benefits do you expect the option you selected under (2) will have:
- Additional biomethane generation (but less efficient than a feed-in tariff).
- Faster development of methane vehicles
- Other (please specify):
- None, it only changes the accounting method

Please motivate your answer

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): creation of a tradable mechanism or standard contracts.
- None

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?
Please provide references for suggested values

There are numerous new biofuels that can be produced by fermentation of sugars. Some of them require a downstream processing others don't. It is highly probable that several such new molecules –mostly new biodiesels- will be industrialized before 2015 however it is hard to predict which one will reach that phase of industrial development. It is also impossible neither to list the potential candidates in Annex III nor to summarize their energetic properties in a generic line (their properties differ substantially from one to another).

Thus it is of the highest importance to add a paragraph at the bottom of the Annex III that would :

- explicitly oblige Member states to take immediately into account new biofuels that would arrive on the market.
- Request MS to report the use of such new molecules to the EC in order to update the table accordingly.

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

It is not essential to have additional decimals but it is important to check that same values in all member states to have a leveled playing field (and not to have additional priviledge like Italy with its + 10 % LHV for European biofuels).

Additionnal element: the double counting of the lower calorific value should be:

- extended to other advanced biofuels (new biodiesels produced from sugar : better properties, higher yields, fit the market demand in Europe, breakthrough technology, reduced food/fuel competition).
- Adjusted according to the cost of the feedstock, the market needs and the cost of the technology: it is not fair to give the same support to used cooking oil methyl esters (cheap feedstock, well known technology) and biodiesel produced from syngas (BTL-FT). The existing situation may delay the industrialization of advanced pathways.