

ChargeUp Europe input to Consultation on Revision of TEN-T – additional comments

The revision of the TEN-T needs to take place in the broader context of the ongoing revision of AFID and EPBD. This is a critical time in the transition to zero emission transport. The decarbonization of road transport is an achievable mid-term goal and can be accomplished with e-mobility at its core. A comprehensive EU wide governance regime for e-mobility should be developed to deliver a comprehensive and harmonized approach to EV charging rollout through coordinated revision of TEN-T, AFID, EPBD and TEN-E. This can provide the framework for EV charging infrastructure rollout at all levels - private, public and cross-border level and for different use cases.

For the TEN-T revision specifically, a number of key factors must be taken into account in order to deliver the most widespread, harmonized and effective EV charging rollout across the European road network which makes the transition to zero emission transport successful and doesn't leave any regions behind.

Make decarbonization of transport an explicit priority of the regulation

The revision should include language making this an explicit priority. Doing so will set a clear priority, resolve conflicts between objectives and give the necessary guidance to grant officers, network coordinators, and others making project decisions.

Introduce specific category for e-mobility

The TEN-T revision should create a category for zero emission fuels (at the same level as road/maritime/rail) within which electrification has its own focus. This will be necessary in order to properly prioritize, set deployment criteria and establish clear rules regarding funding and guidelines for EV infrastructure rollout.

Binding targets

The TEN-T Revision should include binding targets for publicly accessible EV infrastructure which are a subset of broader Member State binding targets introduced in the AFID revision. Such TEN-T targets should not be developed according to a simple X number of chargers per KM approach but rather be based on a comprehensive methodology that takes into account key elements such as EV sales numbers, power levels, use cases, grid capacity, traffic density, existing infrastructure etc. Targets should lead to the deployment of a sufficiently dense EV charging network across and beyond the TEN-T comprehensive network.

Open market and tenders

Finding suitable sites to operate is a core challenge in particular for fast charging stations. Along with the setting of binding targets, it is therefore important that the revision of the TEN-T sets out principles for Member States to develop a site allocation plan to facilitate the targets. The organisation of open and non-discriminatory tender procedures is key in this regard.

The revised TEN-T should provide guidance to ensure that highway concession procedures are in line with principles of EU competition law and ensure that these public procurement processes are non-discriminatory and based on an open market model. These concessions should be accessible to all interested, relevant market parties, including SMEs and independent charging operators.

Unbundled tenders

- In this regard, it is recommended that concessions for EV fast charging infrastructure are separated from other concessions at that location (e.g. petrol or hydrogen). The risk of bundled concessions, or of making EV charging infrastructure an obligatory service alongside other services or energy carriers will act as a barrier to entry for independent market parties. This reduces competition and ultimately affects the quality of service and price for consumers.

Contract Duration

- The revision should provide guidelines for the sustainability and quality of EV charging concessions, including on contract duration. At least 15 years is needed to make a business case that covers losses over the initial years when EV charging demand across different vehicle segments is still relatively low.

Physical space

- Furthermore, it is essential that concessions include physical space sufficient to build a full station that can be modularly scaled up as demand grows. By the time a large proportion of the fleet becomes electric, it will be important to cater for both smaller and larger service areas (which could be a capacity of 20-30 chargers similar to large petrol stations today). In the new design of highway concession policy for fast charging, it is therefore important to already consider the long-term requirements of physical space and grid capacity required to meet the future demand.

Open interoperable requirements

- EV charging infrastructure must also be accessible. Open interoperable technology and communication protocols are key to ensure seamless charging experience across networks and borders. We support minimum interoperability requirements, including for example the enablement of roaming, for publicly accessible EV charging stations on the TEN-T network while highlighting the importance of avoiding technology lock-in.

Addressing investment gaps

Go beyond the core

- The revised TEN-T should permit eligible EV charging deployments in areas outside of the core and comprehensive networks - in towns, cities and rural areas - that can make a large contribution to decarbonization and which, without being eligible for public support, will not be served by the private market, leaving residents and tourists there without public charging options.

Update Urban Nodes

- Importantly, the revision should revisit the Urban Nodes and add additional ones in regions and countries where new there are too few or they do not include growing, multimodal population centers where people begin or end their trips.

Clarify the 60km requirement

- Clarification on what investments are eligible. Currently, there is a requirement that there must be 60 km between 150 kW chargers. In urban nodes, where demand is highest, this would result in one charger per city and not be adequate to serve the drivers' needs. For urban nodes, this should be revised.
- On highways, this requirement could prohibit installing a charger on both sides of a highway, each one serving traffic going in a different. However, this too seems to defeat the purpose. It should be possible to fund chargers serving traffic going in opposite directions and the 60 km threshold should apply to each side of the road.

Charging hubs

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- Hubs, where multiple charging stations are grouped together in a single location and able to serve multiple users are an increasingly important part of the charging ecosystem. In these locations, support for connection and capacity charges should be included and covered to an extent which incentivizes operators to develop them.
- Financial support and eligibility rules should encourage hubs and permit eligible costs to be added together, to make these locations cost effective. Use of energy management systems should also be permitted to distribute capacity across the hub and save large sums on grid upgrades or exorbitant capacity charges.

Funding focus

- Funding Support schemes for EV infrastructure can take many forms, but they should always keep the customer in mind; the number one driver of ensuring high-quality service is competition.
- Support schemes should only apply to recharging stations developed through: i) open and transparent processes where all market players can compete to construct and operate stations and ii) unbundled tenders (e.g. separated from other services) so that the highest-quality fast-charging offer with the most solid, stand-alone business case is selected.
- The Connecting Europe Facility should also include these requirements and prioritize EV infrastructure as a way to decarbonize transport, and cost eligibility parameters should be revisited to ensure such projects can be funded.

HDVs

- The TEN-T revision also needs to include focus on the Roll-out of public charging infrastructure for heavy duty vehicles. This requires larger investments in comparison to the average Light duty electric vehicle charging infrastructure.
- High-power charging stations for HDVs, in particular on TEN-T corridors, will most likely require, from design to implementation, the participation of electricity providers, DSOs and TSOs, CPOs and possibly the integration of additional solutions, such as storage and/or local intermittent RES generation, to minimize the need for significant investments in grid reinforcement.
- Site selection for recharging stations for long-haul eHDVs is also important and can be planned now, so that those sites are developed with access, safe and secure parking, and power for HDVs in mind, while also serving other users in the short term. In that sense, given the larger investments required and an anticipated lower utilization rate until e-HDVs adoption gather momentum, funding and subsidies are of vital importance to support the deployment of EV charging stations for HDV, and sustain a viable business case.