Stand: 17.06.2022

Das große Plus der Gemeinschaft

FACILITATE THE DIFFUSION OF PTX-TECHNOLOGIES

Delegated Act, Renewable Energy Directive 2

Thüga AG is managing a network of more than 100 municipal utilities in Germany. Our partner companies provide electricity, gas and district heating to private households, industry, and SMEs. Thüga AG develops innovation projects jointly with our partner companies. In 2014 we were the first player, who linked electricity and gas distribution networks with power-to-gas in Frankfurt. Today we are part of many hydrogen innovation projects at the DSO level across Germany.

To drive further investments in PtX-technologies that facilitate the energy transition in electricity, heating, and transport we welcome the current draft of the European Commission. On one hand, policy makers and companies must make sure that green hydrogen is generated by renewable electricity. On the other hand, overregulation can be a heavy burden for all companies involved in current projects and will prevent the quick ramp-up of further PtX-projects and the implementation of a European hydrogen economy as scheduled by policy makers.

The aim of national and European policy makers and Thüga are the same: Allow for a quick market development of PtX and assure at the same time the use of renewable energy. However, some elements of the current draft do not represent a viable way to achieve the shared aim. We therefore kindly ask all stakeholders involved to rethink and address the following key issues:

- The definition of renewable electricity used in the Del. Act § 2 (3) should not exclude green power from biomass and storage units. Also, the Del. Act should comply with the term „repowering“ as defined in RED II (§ 2 (10) of directive 2018/2001/EU), without requiring investments exceeding 30% of the investment in a similar new installation. Any such additional limitations and inconsistencies would, if maintained, increase costs and risks for green hydrogen production without providing additional value for society.

- In most cases renewable power generation is connected to the electricity distribution grid. All electricity distribution grids in Germany face huge challenges to increase their grid capacity fast enough. As a result, many upcoming renewable energy power plants will be curtailed. Some distribution grids in Germany are already going beyond 100% renewable electricity. To reduce the burden on electricity distribution and transmission infrastructure, the 90% criteria in § 4 (1) should be based on smaller areas such as the different distribution grids.

- All renewable energy power generation that does not receive financial support during the time of power generation for PtX should be allowed. Currently § 4 (2b) excludes renewable energy that received financial support in the past. Renewable power plants at the end of their support period should not be excluded, as this would be a waste of public funding. On the contrary using these power plants at comparable low costs would ensure their ongoing use and support hydrogen production.

- To allow for a level playing field for investments, European policy makers should not allow additional measures at the national level and delete § 4 (5). We are very concerned that this measure could increase the fragmentation of the upcoming European hydrogen market.

- The transition phase in §7 and §8 should be extended to 2030. In Germany it currently takes approximately 7 years to get all permits for a new onshore wind turbine. Although the government tries to facilitate and speed up the permitting process, there is a high risk, that a transition phase until January 1st, 2027, will significantly delay investments in hydrogen generation.

- Derogations on temporal correlation in §7 do not apply to projects that have received any kind of state aid other than on capital expenditure. Given the varying form and character of state aid and its necessity in the first years of development, this limitation should be deleted.

Hintergrundinformationen:

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/7046068-Production-of-renewable-transport-fuels-share-of-renewable-electricity-requirements-/F3314322_en