

From: [REDACTED] behalf of [REDACTED]
To: [JORNA Kerstin \(GROW\)](#)
Cc: [REDACTED]
Subject: Wärtsilä CEO letter on flexible gas generation in the sustainable finance taxonomy
Date: vendredi 9 avril 2021 09:13:46
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[Wärtsilä taxonomy letter to the Commission_2203202.pdf](#)

Dear Ms Jorna,

I hope this email finds you well. I am contacting you to bring to your attention a compromise proposal on the sustainable finance taxonomy criteria for gas-powered electricity generation.

We have come to understand that the Commission is considering the inclusion of sustainability criteria for flexible gas-powered generation technologies aimed at maintaining grid reliability of electricity supply to the first delegated act. Such criteria would allow for the EU Taxonomy to best take into account the need for system-level optimisation in line with the EU's strategy for energy system integration and the need for grid balancing in an energy system increasingly based on renewable energy sources.

Wärtsilä is a global leader in complete lifecycle power solutions for the energy and maritime sectors, providing competitive and sustainable products on flexible gas power technologies and global shipping to enable the clean energy transition in the EU and beyond. We have been a long-standing, active, and committed partner to the Commission in energy, mobility, and industrial policymaking to realise the common 2020, 2030 and 2050 energy and climate targets.

We see that specific substantial contribution criteria for flexibility would improve the usability of the taxonomy and ensure that the framework provide for an ambitious, cost-effective and just transition for all in a technically feasible manner. A controlled and efficient decarbonisation of the energy system can be achieved by:

- Establishing an additional carbon budget-based threshold for flexible gas-powered generation alongside the static threshold already included in the taxonomy for inflexible gas-powered generation.
- The carbon budget would be calculated by multiplying the static threshold with the hours of a year to create a feasible threshold that could be utilised by peaking power plants.
- The model would improve the system-level approach of the taxonomy without increasing the annual emissions levels already established by the Commission's taxonomy drafts.

The benefits of this model are two-fold: (1) it allows for cost-effective grid balancing with existing technologies to ensure supply security while driving down Member States emissions in the most cost-optimal way and (2) it fosters the uptake of renewable and low-carbon gaseous fuels to reduce gas sector emissions.

Thank you for your attention. Please do not hesitate to get in touch, should you require any further information.

Kind regards,

[REDACTED]

[REDACTED]

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