

From: [REDACTED] (CAB-VON DER LEYEN)
Sent: lundi 27 juin 2022 08:40
To: [REDACTED] (CAB-VON DER LEYEN)
Subject: FW: Meeting with [REDACTED] - Follow up on hydrogen
Attachments: 20220624 Summary response DA RFNBO GHG methodology KV.pdf

From: [REDACTED] <[\[REDACTED\]@edf.fr](mailto:[REDACTED]@edf.fr)>
Sent: Friday, June 24, 2022 4:34 PM
To: VANDENBERGHE Kurt (CAB-VON DER LEYEN) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Cc: [REDACTED] <[\[REDACTED\]@edf.fr](mailto:[REDACTED]@edf.fr)>; WERNER Elisabeth (SG) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Subject: Meeting with [REDACTED] - Follow up on hydrogen

Dear Kurt,

Thank you for your time to meet with [REDACTED] last week, the exchange was extremely open and forward looking.

As requested by you, I take this opportunity to follow-up on the issue of low carbon electrolytic hydrogen in the draft Delegated Acts currently under discussion.

The Delegated Act on the definition of a methodology to calculate the emissions of renewable hydrogen/e-fuels (RFNBOs) includes a set of data and methodologies to calculate the emissions of hydrogen produced with grid electricity. This Delegated regulation therefore provides important indications to investors in electrolytic low carbon hydrogen ahead of the finalization of the Directive on hydrogen and decarbonized gas. It is therefore critical to ensure that the default data, proposed formula, and alternative methodologies are adequate and allow for a robust and sound assessment of emissions for hydrogen produced with electricity from the grid so that this potential can contribute to the EU hydrogen ambition.

With the data currently included in the proposed draft, it is very unlikely that hydrogen projects based on the decarbonized French power mix will go forward. Indeed:

1. The standard electricity emission data for Member States is from 2018 and there is no source. The proposed figure for France is extremely high compared to other public sources.
2. The Life Cycle Emissions for nuclear are also very high and not in line with the latest JRC report on nuclear (the one produced in the context of taxonomy) which we suggest to use for this purpose
3. The alternative methodology to calculate the emissions of hydrogen based on the emissions of the marginal power plant is not relevant especially in largely decarbonized power mixes. The most accurate approach, especially in largely decarbonized power mixes, is to use the hourly emissions of the average electricity mix. This would incentivize electrolyzers to be turned off during hours of highest carbon intensity and to produce when electricity is low carbon.

4. **Finally, we draw your attention to a provision whereby it would not be possible to use any CO2 captured at industrial sites to produce E-Fuels from 2036.** This would jeopardize the ambitious objectives to decarbonize maritime and transport, as well as forbid one of the only decarbonization levers for hard-to-abate processes such as cement production. Derogations/grand fathering/extension of the deadline should be considered for unavoidable process emissions (cement, waste incineration).

I attach for your reference a more detailed summary of our proposals to improve the text and contribute to the EU hydrogen ambition.

Best regards





Présidence
22-30 avenue de Wagram
75382 Paris Cedex 08



Un geste simple pour l'environnement, n'imprimez ce message que si vous en avez l'utilité.

Ce message et toutes les pièces jointes (ci-après le 'Message') sont établis à l'intention exclusive des destinataires et les informations qui y figurent sont strictement confidentielles. Toute utilisation de ce Message non conforme à sa destination, toute diffusion ou toute publication totale ou partielle, est interdite sauf autorisation expresse.

Si vous n'êtes pas le destinataire de ce Message, il vous est interdit de le copier, de le faire suivre, de le divulguer ou d'en utiliser tout ou partie. Si vous avez reçu ce Message par erreur, merci de le supprimer de votre système, ainsi que toutes ses copies, et de n'en garder aucune trace sur quelque support que ce soit. Nous vous remercions également d'en avertir immédiatement l'expéditeur par retour du message.

Il est impossible de garantir que les communications par messagerie électronique arrivent en temps utile, sont sécurisées ou dénuées de toute erreur ou virus.

This message and any attachments (the 'Message') are intended solely for the addressees. The information contained in this Message is confidential. Any use of information contained in this Message not in accord with its purpose, any dissemination or disclosure, either whole or partial, is prohibited except formal approval.

If you are not the addressee, you may not copy, forward, disclose or use any part of it. If you have received this message in error, please delete it and all copies from your system and notify the sender immediately by return message.

E-mail communication cannot be guaranteed to be timely secure, error or virus-free.

