

[REDACTED] (CAB-VON DER LEYEN)

From: [REDACTED] (CAB-VON DER LEYEN)
Sent: lundi 27 juin 2022 08:58
To: [REDACTED] @edf.fr
Subject: RE: Meeting with [REDACTED] - Follow up on hydrogen

Dear [REDACTED],
On behalf of Kurt, I would like to thank you for your e-mail of which I herewith acknowledge receipt.
We have shared it with our colleagues involved.
Kind regards,

[REDACTED]



European Commission
Cabinet of President Ursula von der Leyen
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1049 Brussels/Belgium

[REDACTED] @ec.europa.eu
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DISCLAIMER

"The views expressed are purely those of the writer and may not in any circumstances be regarded as stating an official position of the European Commission."

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



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