

**Position paper of the European Clean Trucking Alliance  
on the Commission's proposal for a revision of the  
Electricity Market Design**

The European Clean Trucking Alliance (ECTA) welcomes the revision of the Electricity Market Design (EMD) rules as an opportunity to ensure Europe's electricity market is on track to facilitate a rapidly electrifying transport system. As an alliance of logistics and shipping companies working to rapidly reduce their emissions from road transport by switching to zero-emission trucks (ZET), we want to stress the importance of connecting short- and long-term charging infrastructure planning as well as to enable grid preparedness for increasing electricity needs to enable a decarbonized European transport system for decades to come. This will support the EU's climate neutrality objective in 2050 as the overwhelming majority of the emissions reduction will come from the sales and operations of zero-emission vehicles.

ECTA members have been deploying an increasing number of battery-electric trucks, installing charging infrastructure at their private depots. To allow for smooth and efficient (long-distance) operations across Europe an increasing number of private and public charging infrastructure will need to be deployed in just a few years. The to-be-deployed infrastructure includes both overnight (with power outputs of 50-150kW) and high-power chargers (with a power output of >800kW) both on Europe's roads and at logistic hubs.

The expected expansion of a truck charging network in terms of both electricity demand and spatial planning, will need to inform distribution and transmission network planning. It is key that the reform of the EMD also aligns with the targets for deploying charging points for heavy-duty trucks, as recently agreed under the Alternative Fuels Infrastructure Regulation, but also factors in increased demand on the grid that will be coming from other regulations<sup>1</sup>. For optimal build-out of charging infrastructure, the needs of hauliers in terms of charging demand and suitable locations need to be matched with the grid's current and planned hosting capacity. In the future, electricity grid optimization could comprise discharging from truck (and additional on-site) batteries providing additional flexibility.

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<sup>1</sup> For instance, Directive 2010/31/EU on the energy performance of buildings foresees that all new non-residential buildings or buildings undergoing major renovations with more than 10 parking spaces should provide for the installation of at least one charging point and cable infrastructure to allow the installation of electric charging points at a later stage for at least one out of five parking spaces.

ECTA suggests the following recommendations:

### **Accelerated grid connections and transparent and proactive planning.**

- **Long-term grid planning and investment:** power demand from battery-electric trucks at private depots and along Europe's highways can be forecasted based on expected electrification scenarios. Both transmission and distribution system operators should be mandated to consult logistics and charge point infrastructure market players for future network upgrade purposes. Network operators should furthermore be incentivised by regulators to invest in an adequate and timely way. The futureproofing of adequate grid connection capacity at strategic parking and charging locations, especially along the TEN-T core and comprehensive networks, will be of utmost importance to support the segment's decarbonisation objectives.
- **Accelerated grid connection processes:** A timely grid connection for charging infrastructure needs to be ensured. Currently a new grid connection can take up to several years and needs to be **significantly reduced to a maximum of 1 year** (from request to realisation) to avoid bottlenecks.
- In addition, the period in which **grid operators need to give an update on the grid connection requests** needs to be shortened and extended to Distribution System Operators (DSOs).
- The European Commission should draw up a list of grid connection requests that should be prioritized (i.e. because they are important for the transition of the energy and transport sector, or because they serve the public interest), with **grid connections for projects combining high capacity HDV charging stations together with on-site renewables and energy storage amongst the priorities.**
- System operators will have to be **more transparent and proactive in their planning for connecting electric vehicle (EV) charging infrastructure**, for example by sharing hosting capacity available for EV charging. This is essential information for providers of EV charging services and helps **accelerate grid-efficient build-out of EV charging infrastructure**. Transmission and distribution system operators will also be financially incentivized to take local demand-side resources, such as EVs, increasingly into account when looking for solutions for grid congestion.

### **Smart e-truck charging to enable savings for customers and the environment.**

- With large numbers of electric vehicles and their batteries as energy storage opportunities connected to the grid, **measures for making better use of demand-side flexibility from EVs need to be considered**. For example, smart charging of electric trucks, in particular during longer parking times while charging overnight at depots, offers considerable savings for fleet operators

and depot owners<sup>2</sup> while improving also the business case for charging service providers. Optimising EV charging also helps to lower electricity prices for all, reduce infrastructure and investment needs as well as reduce the combustion of fossil gas in Europe's power generation.

- In addition, the EMD proposal lowers the threshold for participation in the balancing and ancillary services market to 100 kW, which makes them more accessible to aggregations of EV fleets, e.g. parked e-trucks. This will help develop the market for user-centric smart charging and vehicle-to-grid (V2G) services. It may be advisable to extend this lower threshold also to capacity markets.

In short, the Electricity Market Design is a much-needed framework to get Europe ready for increasing charging needs for its increasing electric truck fleet. ECTA encourages policymakers in Parliament and Council to design the EMD with foresight based on the projected growth of EV truck charging.

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<sup>2</sup> Research by RAP and ICCT found that yearly savings could amount from €80.000 to €95.000 for a depot owner in a typical logistics depot in Germany with 10 electric trucks, which is around 10% to 15% of the total energy costs. [Link](#).

**More the European Clean Trucking Alliance (ECTA)**

The European Clean Trucking Alliance is a coalition of over 35+ companies and organisations active in logistics, consumer goods, manufacturing, retail and supply chain management from across Europe calling for zero-emission road freight.

For more information, please visit the website: [www.clean-trucking.eu](http://www.clean-trucking.eu)



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