

European F-gas Regulation jeopardises the energy transition

Climate protection will only be successful with a successful energy transition, including in the transport and heating sectors. Only a significant grid expansion will ensure the integration of renewable energy sources (RES). This is how to decrease greenhouse gas (GHG) emissions of a society with a rising degree of electrification. For this to happen, a swift integration of RES into the grid must not be endangered.

Every wind energy installation needs **electrical switchgear**. Every grid operator needs it: for the integration of RES, for the connection of charging infrastructure, and for managing an electricity demand which rises due to the increasing usage of heat pumps and other devices. More RES, rising electricity demand and a rising need for modernisation of grids means **more new electrical switchgear**.

Today, most electrical switchgear contains the very strong greenhouse gas SF₆. This practice rightly has to change. Over the last years more and more alternatives have been developed.

In the future, grid operators and power plant operators will install as many SF₆-free devices as available and technically suitable – if possible even exclusively 100 per cent SF₆-free devices. If appropriately designed, the European F-gas Regulation can improve planning security for this.

But what if there is not enough switchgear available in the first years of a ban to SF₆?

In this case, grid and power plant operators only can wait. This means urgently needed **expansion projects will be delayed for an indefinite time period**. The consequence: **Expansion projects will be delayed or stand still; the energy transition will be hampered**. This is exactly the risk resulting from the ENVI Committee's draft report on the revision of the F-gas Regulation:

- From the date of prohibition, only devices without any fluorinated gases will be allowed to be installed (Annex IV point 23). Even **exemptions for technical grounds** (e. g. need of space) – which is included in the Commission's proposal – are **not** planned up to 145 kV. **The market availability of installations is not taken into account at all.**
- From the date of prohibition, **spare parts for existing devices using fluorinated gases can't be purchased any more** (Article 11.1). By this rule – which is already foreseen in the Commission's proposal –, even small damages can provoke the shutdown of the devices. This also prevents resource-saving extensions which are needed for the connection of new customers and production plants. A "dis-enabling" of repair and extension is also an ecologic problem – aside from the economical perspective.

Therefore, the revision of the F-gas Regulation needs three provisions:

1. For new applications, the exemption provisions should be stated more precisely:
 - Next to technical grounds, the exemption provisions should consider the sufficient **market availability of alternative technologies**.
 - If at existing sites there is a lack of space for new technologies which have larger dimensions, an **exemption for constructional restrictions** should be possible.
2. In practice, due to the complexity and the dependency between projects, unpredictable delays can occur. Therefore, the relevant date for the placing on the market pursuant to Article 11.1 should be the **delivery date as contracted**.
3. It must be allowed to **repair existing switchgear devices**. It must be possible to buy, store and install spare parts as well as small amounts of SF₆ which must be refilled after repair works. Besides, **extending** existing switchgear devices must be **allowed to a limited extent** in order to enable the connection of further generators and consumers on the ground.

To enable the energy transition and for climate protection, BDEW advocates for policy members to respect those beforementioned provisions in the revision process of the F-gas Regulation.