

Comments of the VDKi on the working draft of the Federal Ministry of Economics (BMWi) for a coal phase-out law

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**Draft for the coal phase-out law shows: Hard coal-fired power stations are needed - Current draft on coal phase-out law is discriminatory and legally contestable**

To ensure that the light does not go out in southern Germany, coal-fired power stations in the 'southern region' are not allowed to take part in tenders for decommissioning. This shows that coal-fired power plants are needed as partners for renewables. This fact is supported by the Deloitte study "Assessing the flexibility of coal-fired power plants for the integration of renewable energy in Germany" (Deloitte Finance, November 2019). From a purely technical point of view, the existing coal-fired power plant park in Germany (2018) could absorb and integrate growing shares of renewable energies of 50%, 60% or 70% without endangering the reliability of the electricity supply.

The current draft for a coal phase-out law exploits these capabilities of coal-fired power plants, but is discriminatory and therefore legally open to attack. Whoever is needed in the "southern region" to maintain security of supply may not take part in tenders as a "reward", but will be forced to close down later. "Now that he's not needed anymore, he can just go".

In the years 2013 to 2015, large, state-of-the-art coal-fired power plants with efficiencies of 46% were connected to the grid, which would be threatened by compulsory decommissioning without compensation even before the end of their depreciation period. This would be a disservice to climate protection. The Coal Importers Association is committed to the Paris Climate Agreement and Germany's contributions to its implementation. However, it does not help the global climate if the latest coal-fired power plants in Germany are shut down without compensation and replaced by worse power plants in Europe. Even the decommissioning of emission certificates will not change the fact that our European neighbours will have to be called upon to maintain security of supply. The only thing that is certain is that security of supply will then cost more.

This is why the Coal Importers Association advocates non-discriminatory and legally sound implementation of the recommendations of the Commission on Growth, Structural Change and Employment ("Coal Commission").