

Assessment of country policies in the light of recognition

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RE-DISS “recognition”

- RES-Directive lacks of clear, exact definition of recognition
- RE-DISS interpretation of “Recognition” : “to accept foreign Gos for use in national disclosure schemes similar to own domestic Gos; this includes eligibility of these Gos for import and cancellation in national GO registry”
- Status quo: some countries use different inhomogeneous practices for recognition, others have set clear rules for recognition, others haven’t implemented any rules
- Aim: transparent criteria for recognition on Member State level should be implemented and made public in every country.

Proposed criteria for recognition I

- Criteria based on the CA-RES questionnaire
- Adapted by RE-DISS by two sub-levels
- Discussed and agreed upon in the DWs/AG
- proposal, not binding!

Proposed criteria for recognition II

- 6 criteria with 2 levels of sub criteria (CA-RES questionnaire)
 - C1: Implementation of Art. 3 (9) of the Directive 2009/72/EC by the Member State
 - C
2: The issuing member state has implemented Art. 15 of the Directive 2009/28/EC
 - C
3: The issuing member state ensures that no more than one GO is issued in respect of each unit of energy produced and the same unit of energy from renewable sources is taken into account only once (Art. 15 (2) 2009/28/EC)
 - C4: The issuing member state ensures the function of a GO (Art. 15 (2) 2009/28/EC)
 - C5: The Registry system is electronic, accurate, reliable and fraud resistant (Art. 15 (5) 2009/28/EC)
 - C6: Issued GOs include the minimum content of Art. 15 (6) 2009/28/EC

Country policies on proposed recognition criteria - method

- Input:
 - Proposed Recognition criteria
 - Country specific survey (country profiles, qualitative and quantitative data spreadsheet)
 - Information about non-acceptance from Commission
- Lowest sub-level analysed per country (most detailed) – CB can individually draw their conclusions
 - Status of fulfillment (fulfilled, partly fulfilled, no information available, not applicable, not fulfilled)
- Time of survey: 2014 and 2015 data
- 32 countries analysed
- no summary, no conclusion as only provision of information and no evaluation

Country analysis – example

3.1.1 Criterion No 1: Implementation of Art. 3 (9) of the Directive 2009/72/EC (on electricity disclosure) by Austria

Criterion No.	Criterion	Status	Explanation
1	Implementation of Art. 3 (9) of the Directive 2009/72/EC (on electricity disclosure) by the Member State; This can be considered fulfilled based on compliance with the following criteria:		
1.1	National legislative implementation of disclosure system according to Art. 3 (9) of the IEM Directive 2009/72/EC, also including the following:		
1.1.1	Disclosure is mandatory at least for company's mix of all suppliers.	fulfilled	CB=Energie Control Austria
1.1.2	Annual disclosure statement provided with or on bills and promotional material to customers.	fulfilled	
1.2	No double counting with other explicit tracking mechanisms by fulfilling one of the following criteria:		
1.2.1	No further tracking mechanism for RES besides GO and residual mix allowed for disclosure	fulfilled	
1.2.2	If further tracking mechanisms for RES besides GO and residual mix are allowed for disclosure, there should be transparent and reliable mechanisms to exclude double counting of RES production for which a GO is issued	not applicable	no further tracking mechanisms used
1.3	No double counting between GO and any implicit default mix (like e.g. an uncorrected production mix). This can be checked through implementation of one of the following options:		
1.3.1	No statistical default mix possible	fulfilled	
1.3.2	Statistical default mix contains no RES at all	not applicable	
1.3.3	Use of a robust residual mix according to RE-DISS	not applicable	full disclosure, no RM necessary

3.1.2 Criterion No 2: Austria, as the issuing Member State has implemented Art. 15 of the Directive 2009/28/EC

Criterion No.	Criterion	Status	Explanation
2	The issuing member state has implemented Art. 15 of the Directive 2009/28/EC; This can be considered fulfilled based on compliance with the following criteria:		
2.1	Standard size of GO is 1 MWh	fulfilled	
2.2	GO has to be used within (maximum) 12 months after the end of the production period.	fulfilled	
2.3	GO has to be issued by a Competent Authority which is officially appointed, independent from production, trade and supply, and whose responsibilities have no geographical overlap.	fulfilled	CB=Energie Control Austria

Conclusions, assessments

- Use for CB/market parties
 - RE-DISS country information (future updates successor)
 - Assessment of domains:
 - Decide on criteria (based on RE-DISS)
 - Check RE-DISS country assessment for GO recognition as starting point for possible hot spots
 - Have a look at country profiles in order to gain better understanding
 - Follow up with CB at the exporting country, e.g. in order to
 - Answer your specific questions
 - Confirming accuracy of country profiles
 - Provide further documentation
 - CA-RES questionnaire?
- Minimise workload / Harmonisation in Europe ideal, transparency essential!

Contact points

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