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## 1 Implementation of Tracking Systems

### 1.1 Electricity Disclosure

A disclosure system is not yet implemented in Malta, but regulations are in line according to Regulation 8 of the Subsidiary Legislation 423.22 The Electricity Market Regulations (<http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=10685&l=1>) and the Subsidiary Legislation 423.38 Guarantees of origin of electricity from High Efficiency Cogeneration and Electricity, Heating and, or Cooling from Renewable Energy Sources Regulations (<http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=10701&l=1>). The former Regulations came into force on the 11<sup>th</sup> May 2011, whilst the latter came into force on the 23<sup>rd</sup> February 2010. The Malta Resources Authority is the competent body for electricity disclosure.

Malta has a single supplier of electricity and the Competent Authority is working on a comprehensive disclosure system by this supplier.

#### 1.1.1 Disclosure Figures

The disclosure figures are available however they are not yet being included with the bill. Evaluation is currently underway to determine the best methodology to be adopted given the local scenario.

#### 1.1.2 Environmental Information

The bills issued by the sole supplier disclose information on CO<sub>2</sub> emissions. The disclosure of radioactive waste is not applicable for Malta because no electricity is generated from nuclear sources.

#### 1.1.3 Suppliers Fuel-Mix Calculations

The Electricity generated by renewable sources and cogeneration is required by the regulation to be connected to the sole supplier's network and that it is metered through approved methods. Hence this electrical energy is completely traceable.

#### 1.1.4 Acceptance of GOs

Imported GOs are treated equally to national GOs (Regulation 5 (11) of S.L 423.38).

### 1.2 Guarantees of Origin for Electricity from Renewable Energy Sources and High-Efficient Cogeneration

The RES-E and CHP GO systems are in place by law through the Subsidiary Legislation 423.38 Guarantees of origin of electricity from High Efficiency Cogeneration and Electricity, Heating and, or Cooling from Renewable Energy Sources Regulations (<http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=10701&l=1>). As for disclosure, the competent body for these systems is Malta Resources Authority.

A GO is defined as an electronic energy certificate that meets the requirement of the Directive for RES-GO (Regulation 2, Definitions). However, an electronic system for GO is being developed. Currently, the assurance about no more than one GO for the same MWh has to be checked manually.

According to Regulation 11, the 12-month lifetime of the GO starts from the start of the production period (not at the end of the production period as recommended by RE-DISS).

#### 1.2.1 EECS

The system is not compatible with EECS.



### 1.2.2 GO Statistics

To date the Competent Authority has not received any applications requesting GOs.

### 1.3 RES-E Support Schemes

Photovoltaic generators get a Feed-in Tariff and cannot benefit from Tradable Green Certificates (Regulation 13 of the Feed-in Tariff Scheme Regulations S.L. 423. 46).

## 2 Proposals for Improvement of the Tracking System

### 2.1 Proposals regarding general regulation on tracking systems

Malta should implement all of the Best Practice Recommendations (BPR) in order to improve and regulate the Tracking and Disclosure system.

### 2.2 Matrix of disclosure related problems and country-specific proposals

Problem	Country-specific proposal
Possible double counting in different explicit tracking instruments	BPRs: [7], [7a], [7b], [8], [9b], [10a], [10b], [10c], [10d], [11a], [12, 1], [12, 2], [13, 1], [13, 2], [13, 3], [13, 4], [13, 5], [13, 6], [13, 7], [14a], [14b], [15a], [16], [17], [18], [21], [23], [24], [29], [30], [31], [32], [36], [37], [38]
Double counting of attributes in implicit tracking mechanisms	BPRs: [5a], [5b], [6], [9b], [11a], [13, 1], [13, 2], [13, 3], [13, 4], [13, 5], [13, 6], [21], [23], [24], [25], [26a], [26b], [27], [28], [29], [30], [32], [43a], [43b], [44]
Double counting within individual supplier's portfolio	BPRs: [39b], [42]
Loss of disclosure information	BPRs: [3b], [11a], [13, 1], [15b], [19], [22], [391]
Intransparency for consumers	BPRs: [10, 2], [11a], [11b], [11c], [12, 2], [13, 1], [13, 2], [13, 3], [13, 4], [13, 5], [13, 6], [23], [39a], [39b] [40], [41], [42]
Leakage of attributes and/or arbitrage	BPRs: [1a], [1b], [2], [3a], [5a], [5b], [6], [9b], [13a], [19], [28], [33], [34], [35]
Unintended market barriers	BPRs: [4], [7], [7a], [7b], [8], [9a], [9b], [11b], [11.c], [20], [20.a], [20.b], [21]

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