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1 Implementation of Tracking Systems

1.1 Electricity Disclosure

There is no system of fuel mix disclosure for electricity implemented in Bulgaria at the moment. A disclosure system was introduced in late 2007, but it was suspended immediately as it appeared to be in conflict with other legislation. The responsible authority is the State Energy and Water Regulatory Commission (SEWRC / DKER).

The distribution companies are required to connect RES and buy the RES production at preferential feed-in tariff. The cost for this support system is distributed to the consumers of the distribution system operator. Correspondingly, the consumer is informed about how much RES energy has been produced and supported in the service territory of the respective distribution system operator.

1.1.1 Environmental Information

As no formal disclosure system is implemented in Bulgaria for the time being, there is no regulation about provision of environmental information to end consumers of electricity.

1.1.2 Recognition of GOs

The Energy from Renewable Sources Act and the relevant ordinance regulate that GO issued by competent bodies in other EU Member States are generally recognised. However, as there is no disclosure system for application of any such GO and no technical possibility for international transactions implemented anyway, recognition of foreign GO is not of practical relevance for the time being.

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

1.2.1 RES-GO System

Legislation and regulation on Guarantees of Origin has been passed with the Bulgarian Energy from Renewable Sources Act from 2011. The conditions and procedure for issuing, transfer and cancellation of the GOs, as well as the conditions and procedure for recognizing the GOs are determined by an ordinance of the Minister of Economy and Energy (Ordinance №РД-16-1117/14.10.2011).

The Sustainable Energy Development Agency (SEDA) is competent body. Definition of a GO according to §1, 5 of RES Act is: ""Guarantee of Origin"" is an electronic document which serves as evidence before an end user (purchaser for own use) that certain share or quantity of the energy supplied to him is produced from renewable sources."

However, in practice it is used as proof of eligibility for receiving FIT from the grid operator in the RES support system.

The implemented GO system includes an electronic registry in the form of an Excel spreadsheet. Transfer of GO is documented in the Excel spreadsheet following the actual sale of the electricity to the Public Provider (National Electricity Company), end-suppliers and energy traders. Implementation of a more sophisticated GO registry is planned for spring 2014.

It is worth highlighting that Bulgarian regulations implement most of the requirements of Art. 15 of the RES Directive (including e.g. expiry regulation, cancellation after use, information content etc.), although this has only limited relevance taking into account that GO are not used for disclosure in Bulgaria.

1.2.2 CHP-GO System

Chapter XXI of the Energy Act and Ordinance for issuing certificates for CHP-GO published in State Gazette 10/06.02.2009. CHP-GO have not been issued yet. Current regulations do not enable



transferability of CHP-GO. An ordinance based on Art. 159 of the Energy Act lists detailed characteristics of CHP-GO.

The competent authority for CHP GO is, just like for RES GO, the State Energy Regulatory Commission.

1.2.3 EECS

GO system is not implemented according to EECS.

1.2.4 GO Statistics

No GO are used for the purpose of disclosure.

1.3 RES-E Support Schemes

In Bulgaria, RES support scheme consists of a technology specific FIT system, where the FIT is paid by the DSO to the producer, with the GO being the documentation for eligibility for receiving support. The cost is allocated to all consumers within the area of the DSO (so it differs between the three DSO).

Furthermore, there are different kinds of investment support under the Rural Region Development Programme (RRDP).

The support indication on GO only refers to investment subsidies, but not to FIT (as both GO and FIT are linked anyway, and no trade of GO is possible, for the time being this has no further implications).

2 Proposals for Improvement of the Tracking System

As no disclosure system is implemented for the time being in Bulgaria at all, recommendations with reference to the RE-DIIS Best Practice Recommendations are not including all detailed recommendations, but focus on the general implementation (which should then take the individual Best Practice Recommendations into account):

- BPR [22]: Full disclosure schemes should be implemented, including the disclosure of CO₂ emissions and radioactive waste.
- BPR [13]: All GOs should be linked to disclosure.

2.1 Matrix of disclosure related problems and country-specific proposals

Please note that this table is not filled, taking into account that no disclosure system is implemented at all in Bulgaria and thus no basis for a detailed analysis of the “country related problems” is feasible.

Problem	Country-specific proposal
Possible double counting in different explicit tracking instruments	n/a
Double counting of attributes in explicit and implicit tracking mechanisms	n/a
Double counting within individual supplier's portfolio	n/a
Loss of disclosure information	n/a
Intransparency for consumers	n/a
Leakage of attributes and/or arbitrage	n/a
Unintended market barriers	n/a

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