

Report on potential relevant criteria for acceptance of GO and on different possible approaches for acceptance procedures

Deliverable D4.1 under WP4

Version 1, January 2014

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1 Introduction

Guarantees of Origin (GO) for electricity produced from renewable sources are implemented in European countries based on Art. 15 of RES Directive 2009/28/EC. Such GOs are traded in an internal market, and according to this the RES Directive requires individual Member States, in principle, to recognise GOs which have been issued in other Member States. The details on how such recognition could take place, and which reasons might justify a refusal to recognise a given GO are not clearly defined in the RES Directive, and therefore both national Competent Bodies as well as market participants are currently in an unclear situation on how to handle this.

This report acts as a basis for elaboration and discussion on potential relevant parameters for recognition of GOs and the procedures that can be adopted by individual Member States for recognising GOs. Transparent and ideally homogenous rules and procedures lead to higher trust in national systems for disclosure and reduce the potential risk of market arbitrage.

The basis for recognition is given in Art. 15 (9) RES Directive which states that *“Member States shall recognise guarantees of origin issued by other Member States in accordance with this Directive exclusively as proof of the elements referred to in paragraph 1 and paragraph 6 (a) to (f). A Member State may refuse to recognise a guarantee of origin only when it has well-founded doubts about its accuracy, reliability or veracity. The Member State shall notify the Commission of such a refusal and its justification.”*

The definition from the RES Directive is vague, therefore RE-DISS further specifies recognition as the use of a GO issued in another country for national disclosure purposes. The report aims at displaying the theoretical procedures and the status quo on national procedures to recognise GOs issued in another Member State. Further, a first selection of potential relevant criteria for accepting foreign GOs for national disclosure purposes is displayed and discussed.

2 Status Quo

Member Countries are in different stages of implementing the requirements of the RES-Directive. Some countries have fully implemented the necessary requirements, others are in the process of implementation and again others have just started their national implementation. That implies that the quality of GOs is unequal across Europe.

Even after countries have implemented the RES Directive on a national level, EU Member States face the challenge of having to assess whether they consider foreign GOs sufficiently accurate, reliable and veracious in order to “recognise” GOs as required by Article 15 (9) of the RES-Directive 2009/28/EC.

The Directive lacks of an exact, clear definition of recognition, however it could be assumed by Member States that a GO can be treated as accurate, reliable and veracious when all requirements coming from the Directive are fulfilled, implemented into national law and provided on the GO itself. This still leaves room for interpretation, especially when defining the requirements from the RES Directive for national practices.

Under the vague basis provided by the RES Directive, potential types and views of recognition are discussed in this chapter to build the background for the potential criteria that can be used for the recognition of GOs issued in another country.

2.1 Types of recognition

The RES Directive itself does not define the exact meaning and practical implications of “recognition” of GOs issued in another country.

While it seems appropriate to the RE-DISS project team at first hand that the term “recognition” in the Directive is understood with the meaning that a GO is accepted for a particular action or purpose similar to domestic GOs, like acceptance of imported GOs for national disclosure purposes, also further definitions could be applied. In principle different definitions of “recognition” of GOs could be:

- Establishment of the technical connection for importing GOs from different national registries into the own domestic registry (can be a central electronic connection or bilateral connections between registries to import in the specific domain)
- GOs are valid for import into a national registry
- Acceptance of imported GOs for national disclosure purposes.

Based on these theoretical types of recognition, the positions that have been taken by some of the relevant stakeholders were analysed and are summarised in the following subchapters.

The terms recognition and acceptance are used as synonyms.

2.1.1 Different interpretations of recognition in European projects and organisations

To reflect the current different views of recognition of GOs, the interpretations of three of the most relevant international stakeholders in terms of GOs (RE-DISS, Concerted Action and AIB) are displayed in this chapter.

The **RE-DISS II project** proposes to define the term “to recognise” used in the 2009/28/EC RES-Directive as follows:

“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 the national GO registry.”

Several of the Best Practice Recommendations (BPR) as published by the RE-DISS project team (latest Version 2.1, see <http://www.reliable-disclosure.org/documents/>) are relevant in this context:

- *BPR [13]* states that all GOs should be linked to disclosure.
- *BPR [16]* advises that GOs should be the only tracking certificate used.
- *BPR [20]* specifies that transfers of GOs should not be restricted between registries of different countries. That means that the decision about recognition of a GO should not hinder its import into a specific country to avoid barriers to trade.

- *BPR [21]* states in more detail that within the rules of the respective Directives, countries should specify their criteria for acceptance of imported GOs for the purpose of disclosure. The criteria should be applicable for all EU member states, other members of the European Economic Area (EEA) and Switzerland, as well the countries of the Energy Community Treaty, as soon as they have installed proper systems for GOs and disclosure which are in line with the European Directives. If other countries want to issue GOs which are accepted for disclosure, they need to issue certificates based on Art. 15 of Directive 2009/28/EC or compatible national law. The criteria should include details on the electronic interfaces, the data format and contents of GOs to be imported. Recognition should be rejected from countries which have not implemented an electricity disclosure system or where appropriate mechanisms to avoid double counting are not in place.

The **Concerted Action** on the Renewable Energy Sources Directive¹ (CA-RES) deals with the status of implementing the requirements of the 2009/28/EC RES-Directive in European Member States into national law.

Concerted Action has established a working group (WG 10 in phase 1 of the project) which deals with the status of implementation of Article 15 of the RES Directive and which particularly focuses on the implementation of a national system for GOs to “*create a reliable and trustworthy source of information to be used to disclose the origin of electricity to consumers*”².

Based on the interpretation of CA-RES, recognition of GOs should be based on the following aspects:³

- “*a proper implementation of all elements of Article 15 of the Directive, including the implementation of a robust and transparent disclosure regime, preventing double counting*”
- “*The authenticity of the GO’s issued in another Member State should be verified, and any doubts on certain aspects relating to the implementation of Article 15 should be removed by the exporting Member State*”
- “*Any decision to not recognize GO’s issued by another Member State should be notified to the public [...]*”
- “*A Member State will notify the Commission about any decision to refuse recognition of GO’s issued by another Member State and its justification*”.

WG 10 of CA-RES has developed a questionnaire which can be used by participating members of CA-RES to find out the status of implementing the requirements of Art. 15 RES-Directive and the functioning and details of the implemented disclosure systems. The questionnaire includes questions about the GO system; the issuing, transfer and cancellation processes; the facilities in place for electronic handling of GOs (generally a registry); as well as

¹ The “Concerted Action supporting the transposition and implementation of Directive 2009/28/EC of the European Parliament and of the Council on the promotion of the use of energy from renewable sources (RES Directive) CA-RES” is a project supported by Intelligent Energy Europe (IEE). Concerted Action phase I ended in spring 2013, the second phase of CA-RES started in August 2013 and has a duration of 3 years.

² For more information see: www.ca-res.eu, Working group summaries, WG10

³ www.ca-res.eu, Working group 10 summary, p. 8

the assigned roles and tasks and the national disclosure system in place. According to the questionnaire template introduction text, this document shall not only provide guidance for competent bodies for a proper implementation of national GO and disclosure systems, but:

“Furthermore it [the questionnaire] is aimed at providing member states with an outline on how to assess the GO system and disclosure of other member states. Answers to this questionnaire should be provided before any import of Guarantee of Origin should be considered as full transparency must be provided about operations relating to GO and disclosure (c.f. Art. 15 RES Directive).”

In other words, the answers to the questionnaire should help national decision makers to evaluate if GOs issued by another country should be imported to the national system.

Further, CA-RES came to the conclusion that the role of a GO within a larger framework of disclosure needs to be considered as relevant. Therefore it is important to analyse the usage of a GO as well as whether the national regulations of disclosure create a coherent disclosure on a European level.⁴

The **Association of Issuing Bodies (AIB)** is a voluntary organisation of European Competent Bodies which runs a technical environment for transferring GOs according to a certain technical standard – the EECS standard – between European countries whose national registries are connected to the AIB-Hub (central data interface).

Member States trading GOs via the AIB Hub have to fulfil all relevant criteria of the EECS Rules⁵ to be connected to the Hub. This is mainly described in Section III, in particular Part E of the EECS Rules.

EECS Rules foresee that imports of EECS certificates have to be accepted in the national systems by registries which are connected to the AIB Hub, both RES GOs and all other EECS Certificates⁶. That means that EECS certificates are in principle accepted within the registries of AIB domains (databases), irrespective of the national decision of whether these GO and certificates are recognised for disclosure purposes.

However, a few countries have introduced exceptions to this EECS principle. These countries only allow imports of RES-GOs which can be accepted for disclosure purposes within their national system. Certificates which are not accepted for national disclosure purposes are blocked and cannot be imported into the national GO database.

The AIB perspective seems to be strongly related to the principle of establishing a technical connection to import and export GOs of a certain quality (the EECS quality) into and from individual registries.

Through the CA-RES working group dealing with Guarantees of Origin, members of European governments suggested that AIB should have a more active role in assessing reliability of GOs which are transferred via the AIB Hub, which is likely to have also an impact on recognition by users of the AIB Hub. It has been suggested by CA-RES that AIB should also take into consideration that the country of origin has a proper disclosure system in place which restricts double counting of GOs. Only under those circumstances GOs should be transferred to other countries. If AIB concludes that these conditions are not fulfilled for a user of the AIB Hub, this domain is only allowed to import foreign GOs to their own domain, while export is

⁴ www.ca-res.eu, Working group summaries, WG 10, p. 4

⁵ www.aib-net.org, EECS-Rules, Release 7

⁶ For further information see EECS Rules, Release 7, Chapter E 3.3.1 c, d. (also: Chapter C 5, especially C 5.1.)

restricted. In 2014 AIB plans to adapt the EECS Rules to comply with this advice from CA-RES and also implement a proof of the national instalment of a proper disclosure system which avoids double counting. Details have to be further specified.

To summarize, RE-DISS, CA-RES and AIB share the opinion that GOs should not be restricted from being transferred between countries. RE-DISS interprets recognition or acceptance of foreign GOs for the use in national disclosure schemes similar to the use of the own domestic GOs which includes eligibility of these GOs for import and cancellation in the national GO registry. A GO can be cancelled in the national registry if it is recognised. CA-RES specifies that imported GOs should be issued in countries which have a proper disclosure system in place to avoid double counting so that these GOs can be recognised for national disclosure purposes. AIB currently doesn't take a position itself on whether import in the registry means that the GO should be eligible for use for disclosure purposes in the respective domain. It's currently more seen as a technical connection for AIB members to transfer GOs under a certain quality. In the near future a revision of the EECS Rules is planned to take into consideration the principle that EECS-GOs shall only be transferred via the AIB Hub if they have been issued in a country which has a proper disclosure system in place that avoids double counting.

2.1.2 Different interpretations of recognition on Member State level

On Member State level it is up to the individual countries to define and regulate the recognition of GOs for national disclosure purposes in their national laws, as the 2009/28/EC RES-Directive doesn't specify details on recognition criteria and procedures.

Most European Member Countries have not yet formally implemented on a national basis any regulation on the conditions for accepting GOs for national disclosure purposes, neither in their national laws, secondary laws nor in other documentations which are publicly available. This lack of transparent rules for recognition on a national basis can be a barrier to the internal market. Trading parties might be reluctant to conclude contracts for delivery of GOs if for them it remains unclear whether and how the related GOs will be recognised. On the other hand, this lack of clear criteria and procedures might leave a door open for imports of foreign GOs which actually should not be considered reliable, veracious and accurate.

This is a clear signal that this topic needs to be further elaborated and ideally harmonised across Europe. An overview of the aspects which seem to be most relevant and which criteria seem appropriate to facilitate and support the work of national Competent Bodies will be provided within the work of the RE-DISS II project. A first preliminary proposal for a set of criteria is provided in Chapter 4 of this report.

Harmonised recognition rules might help guiding different domains towards a good implementation of GO and disclosure systems, as other domains explicitly ask them to do so by means of their respective recognition procedure. A common understanding of relevant criteria should be helpful.

In the 7th RE-DISS Workshop "*Making Guarantees of Origin and Electricity Disclosure in Europe more reliable*" for Competent Authorities and governments carried out in September 2013 in Brussels, the RE-DISS project team asked the participating Competent Bodies representing EU Member States as well as Iceland, Norway and Switzerland to fill in a questionnaire and answer questions on the interpretations of recognition on Member State level, the recognition criteria and procedure for GOs issued in another country for their disclosure purposes. The questionnaire is attached in Annex I. The participating European countries

filled in the questionnaire, so we received 15 answers, which are described and evaluated below and in Chapter 3.1.

This rough enquiry and additional information from AIB provided the following picture:

17 European Member States are currently connected to the AIB HUB.⁷ For some countries, this is the only precondition for the recognition of certificates for national disclosure purposes. In other countries, the Competent Bodies, which are appointed by law to be responsible for disclosure and/or for GO systems decide if imported GOs can be used for disclosure purposes in the country. Other countries accept imported GOs unless potential complaints arrive.

A minority of European Member States seem to have clear and transparent rules or regulations in place on criteria for accepting GOs.⁸ Specific details on existing acceptance procedures are displayed in Chapter 3.

By publication of country profiles for the EU28+NO+CH+IS, RE-DISS II provides an initial central platform for relevant country-specific information needed for decisions by Member States on the recognition of GOs. This should support an efficient and transparent framework for all Competent Authorities and participants of the Internal Electricity Market.

3 Acceptance procedures

Starting from the more regulated to the more practical options, theoretical approaches for recognition procedures include:

- Common decision by market participants and their agents and the Competent Authority based on criteria stated in national law or secondary law;
- Decision by Competent Authority/Issuing Body/Ministry/Regulatory Authority based on settled and published criteria;
- Recognition of electronically transferred GOs until potential complaints arrive;
- Recognition of GOs without any further prove of quality and compliance with EU-Directive.

The status quo of the current acceptance procedures for a selection of countries as well as the RE-DISS perspective on acceptance procedures are displayed below.

3.1 Status quo of current acceptance procedures in Member States

In practice, the presented overview shows that European Member States use very inhomogeneous approaches for accepting GOs issued in foreign countries for national disclosure purposes. In many cases, the procedures are not clearly regulated on a national basis. Only few countries have clearly defined procedures in place for recognition of GOs.

⁷ www.aib-net.org

⁸ Based on the results of the questionnaire

The results of the questionnaire of the 7th RE-DISS Workshop “*Making Guarantees of Origin and Electricity Disclosure in Europe more reliable*” for Competent Authorities and governments carried out in September 2013 in Brussels are described and evaluated below. The questions were based on interpretations of recognition on Member State level, the recognition criteria and procedure for GOs issued in another country for their disclosure purposes. Furthermore, participating Competent Authorities were asked to evaluate the relevance of criteria based on their personal opinion and appraisal out of a proposed set of criteria concerning their national relevance, and to add further criteria where relevant.⁹

The results of the questionnaire show the following principles for recognition of GOs issued in other countries for national disclosure purposes in a sample of Member States:

- Recognition of GOs issued in foreign countries is in most surveyed countries based on the active decision of the Competent Authority, the related Ministry or the Regulatory Authority on the basis of certain criteria.
- Only two Competent Bodies state that they recognise all GOs until complaints from the market arrive.
- For two domains it has been stated that there is no procedure in place yet.

The answers to the questionnaire also revealed that the question of GO recognition is perceived among the surveyed authorities as one which clearly deserves their active involvement.

With respect to the individual domains, the assessment gained the following picture:

- The approach “*common decision by market participants and their agents and the Competent Authority based on criteria*” stated in national law or secondary law is used in **Austria**. Austria has published in the secondary disclosure by-law specific criteria which need to be fulfilled to recognise foreign GOs for Austrian disclosure purposes (§ 6 SK-VO 2014)¹⁰. Once a supplier is interested in importing and using GOs issued in a foreign country he has to assess whether the criteria for the acceptance are fulfilled and informs the Regulatory Authority - E-Control - about the outcome. Based on the primary research of the supplier and additional research by the Regulatory Authority the decision is taken by the Regulatory Authority. In case the country of issue fulfils the Austrian criteria for acceptance, it is added on a list which is published on the website of the Regulatory Authority¹¹. The list is updated continuously. The list is a document in progress and includes only countries which have been asked for verification and fulfil the criteria for recognition.
- In **Belgium/Flanders** the decision is taken by the Competent Authority VREG on suspicion of unreliable GOs (i.e. if VREG comes to the conclusion that the risk of double counting can't be excluded). If GOs are not considered reliable they can't be accepted for import in the system of Flanders.

⁹ In their evaluation, attendees had the option to distinguish between very relevant (red), less relevant (black), or not relevant.

¹⁰ See: http://www.e-control.at/portal/page/portal/medienbibliothek/recht/dokumente/pdfs/SKV_Novelle%202013_kons_clean.pdf

¹¹ See: <http://www.e-control.at/portal/page/portal/medienbibliothek/oeko-energie/dokumente/pdfs/>

L%C3%A4nderliste_Sept_2013_en.pdf

- In **Belgium/Wallonia** the final decision of accepting GOs from foreign countries for national disclosure purposes is officially taken by the Competent Authority.
- In **France** the Ministry is responsible for the decision of recognising GOs issued in foreign countries.
- In **Iceland** the decision is taken by the Issuing Body which then communicates the result to the Regulatory Authorities involved.
- In **Italy** the decision is taken by the Competent Authority. Only in case of doubt, the final decision is left to the Ministry.
- In **Luxembourg** GOs which are used for national disclosure purposes need to be in line with EECS rules. Luxembourg considered to be more transparent in their own system and published relevant detailed information about their system on the webpage of the Regulatory Authority.
- In **Slovenia** the decision to recognise GOs from a certain foreign country is based on the decision of the Competent Authority.
- **Finland** and **Switzerland** generally recognise imported GOs via the AIB-Hub unless potential complaints arrive. This is an ex-post approach in case of complaints or information about misuse or not fully compliant use of the EECS system.
- The **Croatian** Competent Authority plans to consult the government in case GOs need to be refused for recognition for disclosure purposes.
- **Norway** uses EECS as a basis for importing GOs and can accept those certificates for Norwegian disclosure purposes.

It is interesting to stress that four countries give a very important role to the EECS standard, since GOs are accepted as long as they are EECS GOs and that there are no complaints.

Most countries only accept renewable GOs (and CHP GOs) as they have national systems for only renewable GOs in place. Other countries (ex. Sweden, Austria) have implemented full GO disclosure systems and therefore also accept certificates from other sources than renewables (fossil, nuclear, CHP). In Austria the criteria for accepting GOs will be equal for renewable sources and non-renewable sources. Also Iceland does not differentiate a recognition of renewable GOs and non-renewable certificates of origin.

As a result of the questionnaire, currently, the most common approach for acceptance procedures is that a national authorised organisation decides if GOs can be recognised for national disclosure purposes (ideally prior to import).

3.2 RE-DISS interpretation

RE-DISS considers it relevant to implement on a national basis transparent criteria for the recognition of GOs issued in another country. With the implementation of criteria the risk of market arbitrage is reduced and the market can function in a more transparent way for all market participants. It should also be discussed amongst Competent Authorities to which degree such criteria should be harmonised amongst Member States over and above the very general regulations provided by the RES Directive.

When implementing rules to check GOs issued in other countries and imported into the national domain, countries should be aware that a check of individual GOs might not be practicable, as it might result in a lot of work for the Competent Authority. In any case, performing the check only ex post is hardly practicable. At the moment of checking, the trading contracts would have been not only signed but already fulfilled, the supplier might have already used

the foreign GO for disclosure purposes and possibly even already integrated into the disclosure statement for customers. This would result in a recalculation in the case of a non-acceptance by the Competent Authority which most likely leads to confusion of final customers or loss of confidence in the supplier if disclosure statements are corrected ex-post. Therefore, Competent Authorities should ideally implement overall system checks once they have implemented clear criteria on recognition in their national domains. GOs which are not accepted as they originate from GO systems which generally do not fulfil the criteria should be blocked from cancellation or automatically marked in the system before they can be used by the supplier.

In addition, it is important to distinguish between issuing domains and “transit domains”. The reliability of the issuing domain is of primary importance, but in case the GO passes domains which have a poor and non-reliable registry in place and handling procedures behind, then a GO from a trust-worthy domain might not be accurate and reliable any more. Therefore it is always important to proof the domains through which the GO has been passed through to a certain extent in order to avoid a lowering of the quality of the original GO.

For the major share of international GO transactions this seems to be a theoretical problem, as most of the transfers of GOs are done electronically via the AIB Hub which guarantees a certain quality. It can become problematic if bilateral connections are established with countries that have not fully implemented the requirements of the European Directives and/or where no proper disclosure regulations which excludes double counting are in place.

4 Recognition criteria

For the implementation of a proper acceptance procedure on a national basis, transparent acceptance criteria are necessary. This chapter describes which criteria are deemed important by national Competent Authorities and gives an insight in the RE-DISS recommendations on potential recognition criteria.

According to RES Directive Art 15 (9), Member States may refuse the recognition of GOs only if well-founded doubts about its accuracy, reliability or veracity appear. It is, however, not defined how this should be exactly defined, which leaves room for interpretation by the individual Member States.

The RE-DISS project team has developed a first draft set of potential criteria for recognition of GO based on: practical experiences regarding functionality and reliability of GO systems and disclosure systems in Europe; the requirements of the RES-Directive; existing public information as achieved by CA-RES; as well as discussions with individual Competent Authorities on GOs and Disclosure.

The proposed parameters for acceptance of GOs for national disclosure purposes have been defined with the aim to include all relevant parameters in order to assess a fulfilment of criteria for compliance with the requirements of Article 15 of the RES-Directive to guarantee accuracy, reliability and veracity of the respective GO. At the same time, the parameters have to be accessible with reasonable efforts.

4.1 Results of the survey

In the 7th RE-DISS Workshop for Competent Authorities as mentioned above, a first rough version of this proposed list of criteria has been evaluated by attending Competent Authorities, which were asked to state which criterion they deem to be highly relevant. This survey

resulted in the following ranking of criteria for recognition of GO, in descending sequence of relevance:

- 1) Quality of GOs (Art. 15 (6) of RES-Directive 2009/28/EC implemented)
- 2) Exclusion of double counting
- 3) Security of Data
- 4) GO unique tracking system for disclosure
- 5) Transparency
- 6) Full disclosure schemes implemented
- 7) Technical checks of plants

4.2 Preliminary RE-DISS recommendations

In this part, the RE-DISS team proposes a list of criteria for recognition of GO, that should be fulfilled as prerequisite to Competent Authorities recognising foreign GOs for their national disclosure.

The proposed list of criteria is based on the analysis of what Competent Authorities evaluate as being the most relevant criteria to assess foreign GOs on the one hand. On the other hand, the RE-DISS team has worked on the prioritisation of the BPR in terms of importance for recognition (see Annex II). This prioritisation is integrated in the list below, in the sense that criteria ranked 1 and 2 were taken into account.

For a first approach, since the obligation to recognise GOs is only covering RES and CHP GOs, it is proposed to start with establishing criteria that are focussed on these types of GOs.

The most straightforward criteria relate to the fact that GOs should be compliant with the detailed requirements that are stated in Art. 15 of the RES-Directive, which are linked to the **Quality of the GO**. RE-DISS suggests that this criterion can be considered fulfilled based on compliance with the following points being implemented in the domain (please note that some of the current RE-DISS BPR as specified support fulfilment of these criteria):¹²

- Unit of a GO is 1 MWh (Art. 15, 1);
- Purpose of a GO is disclosure, and no other (conflicting) purposes; particularly no accounting on EU RES targets (Art. 2, (j); Art. 15, 1; Art. 15, 2, 4th paragraph; ; cf. BPR [13]);
- There should be no more than one GO for the same unit of electricity (Art. 15, 2); cf. BPR [14])
- Expiry rule (not more than 12 month life time after the end of the production period) is implemented (Art. 15, 33). GOs which have reached this lifetime should be collected into the Residual Mix; (cf BPR 3)

¹² All references refer to the respective regulation of the Renewables Directive 2009/28/EC

- GO is issued by a Competent Authority which is officially appointed, independent from production, trade and supply, and whose responsibilities have no geographical overlaps (Art. 15, 4);
- GO is an entry in an IT database system (Art. 15, 5)¹³
- GO contains all minimum information content as required by Art 15, 6
- GO to be used only once (Art. 15, 2, 2nd paragraph; Art. 15, 3, 2nd sentence).

If most of the points in this part do not leave room to interpretations, the last two are more difficult. The Assessment of their implementation brings about other checks that need to be carried out.

In addition to the criteria stated above, which can be directly derived from the RES Directive, the following are proposed to assess whether *GOs are accurate, reliable and fraud-resistant* (some of the current RE-DISS BPR as specified support fulfilment of these criteria):

- GO is issued based on actual meter readings (cf. BPR [10]);
- GO is only issued for RES-E which is then used by end-consumers (Issuing for pumping hydro and onsite consumption should be transparent) (cf. BPR [10]);
- There are mechanisms implemented for on-going control of registered data (e.g. re-audits, random checks, etc.);
- Correct accounting of RES share of combustion plants is assured by adequate measures (cf. BPR [10]);
- Issuing Body can correct errors in issued GOs;
- Technical changes to plants are registered in the short term.
- (see also “security of data” and “Technical checks of the plants”)

Further proposed criteria to assess whether GO can be used only once are :

- Use of a GO is only possibly if the GO is electronically cancelled.
- GO cannot be used or transferred after expiry, cancellation, export
- Exported GO are practically removed from the exporting registry
- Processes in the registry exclude duplication of GO
- (see also “Exclusion of double counting” below)

There are also further RE-DISS BPRs which support sound implementation of these criteria in technical terms: BPRs [cf. 7], [8] which relate to the use of the AIB Hub and to the issuing of GOs; and BPRs [12], [cf. 14] and [cf. 15] relating to the issue of only one GO per unit of electricity.

“Exclusion of double counting”: This criterion can be considered fulfilled based on compliance with the following aspects:

¹³ Although Article 15 (5) of the RES Directive does not explicitly require handling in a electronic database, this is considered being an appropriate definition of the requirements of Article 15 (5).

- No double counting between GO and other explicit tracking mechanism, (see also aspect “GO as unique tracking system for disclosure” below). Current RE-DISS BPR contain the following recommendations which support fulfilment of this criterion.
 - cf. BPR [12]: One comprehensive registry for all GOs. If multiple registries are in place, they need to be well coordinated.
 - BPR [16]: GOs should be the only tracking certificate used. Any other tracking systems of a similar purpose and function as GOs should be converted to GOs.
 - BPR [17]: Besides GO, only Reliable Tracking Systems (RTS) (which may include contract based tracking) and the Residual mix should be available for usage for disclosure. No other tracking mechanisms should be acceptable.
 - BPR [23]: RTS should be defined where appropriate based on criteria of added value, reliability and transparency.
 - BPR [24]: RTS can comprise homogenous disclosure mixes for non-competitive market segments where no choice of supplier or different products exists, support systems whose interaction with disclosure requires a certain allocation of the attributes of supported generation or for contract based tracking.
 - BPR [29] : If contract based tracking (CBT) is allowed, it should be regulated clearly.
 - BPR [30]: The regulations on CBT should ensure transparent and comprehensive rules of the tracking system, that double counting of attributes and losses are minimised and that the minimum disclosure information is available on time.
 - BPR [31]: GOs should be used in addition to potential contract based tracking mechanisms (for other purposes).
 - BPR [32]: If generation attributes are allocated to suppliers and consumers “ex post” based on contracts, then all requirements to qualify as a RTS needs to be fulfilled and clearly regulated and statistics have to be published.
 - BPR [36]: Countries should clarify the relation between their support schemes for RES & cogeneration and GOs and disclosure schemes.
- No double counting between GO and any implicit default mix (like e.g. an uncorrected production mix). Current RE-DISS BPR contain the following recommendations which support fulfilment of this criterion:
 - BPR [25]: Countries should provide a Residual Mix as a default set of data for disclosure of energy volumes for which no attributes are available based on cancelled GOs or based on other RTS. If not using the RE-DISS Methodology, domains should make sure that at least green attributes are not double counted.
 - BPR [28]: As default, the Residual Mix should be calculated on a national level. Regional approaches may be possible.
 - There are more BPRs referring to the calculation of the residual mix that could be followed: BPRs [26], [27]: The Residual Mix should be calculated based on the RE-DISS methodology. Competent Bodies should cooperate to adjust their Residual Mixes in reflection of cross border transfers of physical energy, GOs and RTS.

- No multiple use of the GO itself is possible. Current RE-DISS BPR contain the following recommendations which support fulfilment of this criterion.:
 - BPR [38]: All electricity products offered by suppliers with claims regarding the origin of the energy should be based exclusively on cancelled GOs.
 - BPR [39]: Products which differ in terms of origin of energy should be required to give product-related disclosure information to all customers, including default products.
- No double issuing of GOs

“**Security of Data**” covers technical aspects of handling the GOs within the registry in order to avoid intentional or unintended corruption of the registered data. Current RE-DISS BPR contain the following recommendations which support fulfilment of this criterion:

- Issuing, handling, transfer and cancellation of GO in a secured registry with automated and auditable processes;
- One comprehensive registry per domain (BPR [12]);
- Transfer via a reliable interface between the respective national registries (BPR [7]).

“**GO is the unique tracking system for disclosure**” if the aim of GOs is to use them for disclosure purposes, as suggested in BPRs [13], [16 – 18] and [38]. Current RE-DISS BPR contain the following recommendations which support fulfilment of this criterion:

- BPR [13]: All GOs should be linked only to disclosure;
- BPR [16]: GOs should be the only ‘tracking certificate’ used. Any other tracking systems of a similar purpose and function as GOs should be converted to GOs;
- BPR [17]: Besides GOs, only RTS and the Residual Mix should be available for usage for disclosure. No other tracking mechanisms should be accepted;
- BPR [18]: Green power quality labels should use GOs as the unique tracking mechanism
- GO linked to disclosure (see also “Quality of GO” above) and disclosure should exclusively be based on cancelled GOs (cf. BPR [38]);
- Other tracking instruments only if they are reliable (RTS) (BPR [23]) and can be clearly kept apart from GO volumes.

“**Transparency**” is linked to the willingness of Competent Authorities to publish information on their national system for the evaluation of acceptability in other domains. This criterion is linked to the specifications in BPR [21] (last sentence of the referred BPR). This criterion can be considered fulfilled based on compliance with the following aspect:

- Competent Authority is willing to publish information about its system for evaluation of acceptability in other domains.

“**Full disclosure schemes implemented**” covers the national implementation of a proper disclosure system. This criterion can be considered fulfilled based on compliance with the following aspect:

- Including distinction of at least RES from other fuels;
- Disclosure is mandatory for all suppliers;
- Annual disclosure statements published for customers;
- see also BPR [22]: Full disclosure schemes implemented, including CO₂ emissions and radioactive waste

One further criterion was mentioned by the Competent Authorities as being relevant for checking if GOs issued in other domains can be accepted for national disclosure purposes. The possibility to do “**technical checks of the plants**”, e.g. checking the metering data and the output is considerably relevant. This criterion can be considered fulfilled based on compliance with the following aspect:

- GOs are issued based on actual meter readings
- Mechanisms implemented for on-going checks of registered plant-specific data;
- Mechanisms implemented for control of used fuels in combustion plants;
- Mechanisms implemented to correct errors and to reflect updates of plants.

These criteria for recognition of GOs issued in another country for national disclosure purposes are large scale criteria and act as a preliminary set of criteria. The ranking of the criteria is the result of the first evaluation of Competent Bodies concerning acceptance criteria. This set of criteria will be further elaborated based on further analysis and discussions with Competent Authorities during the RE-DISS II project.

5 Outlook

For some countries, the assessment is facilitated by the fact that they are issuing EECS-GOs, which means that many of the criteria mentioned above are fulfilled. However, several disclosure issues are not covered by the EECS standard, and only 17 Domains are issuing EECS-GOs. The assessment of all the criteria individually by each Competent Authority for each Domain would represent quite a lot of work.

The update of the RE-DISS country profiles early 2014 for the EU28+NO+CH+IS includes an inquiry amongst all national competent bodies about relevant parameters and current criteria and procedures for recognition of GOs and their usability in national disclosure frameworks. The provided information from this survey in combination with the preliminary results of this report will be the basis for the publication of relevant up-to-date country specific information. This information can be used by Competent Bodies in their decision making on whether they accept foreign GOs, or whether they want to launch additional investigations on the acceptability of certain types of GOs from certain countries. In a separate report, the data will be aggregated and a cross-cutting analysis of the current practices of mutual recognition will be published in April 2014. The cross-cutting analysis of the current practices of mutual acceptance will include current cases of non-acceptance (if existent) and individual approaches for acceptance/non-acceptance and the reasons for non-acceptance of such GOs. RE-DISS II will also work on further development of RE-DISS BPR in order to have a coordinated structure with the recognition criteria which will be proposed after further elaboration and

analysis. This shall ensure that the BPR explicitly cover all requirements which are considered relevant in that respect.

Furthermore, RE-DISS promotes the idea of implementing a database or central information platform in the medium run which includes and publishes all country-specific information needed for Competent Authorities to decide on their set criteria on accepting GOs issued in foreign countries. Such an information platform should be implemented either by a follow up organisation or the Competent Authorities themselves.

6 Literature

Austrian Disclosure by-law 2011, revision 2013:

http://www.e-control.at/portal/page/portal/medienbibliothek/recht/dokumente/pdfs/SKV_Novelle%202013_kons_clean.pdf

Concerted Action (CA-RES):

<http://www.ca-res.eu/> and http://www.ca-res.eu/index.php?eID=tx_nawsecuredl&u=0&file=fileadmin/dam/ca_res/public_downloads/working_group_summary/CA_RES_WG10_publication.pdf&t=1390994219&hash=9bc3b09a9fccefcfac48cfad2d4fc6d2

EECS Rules, Release 7, v5:

http://www.aib-net.org/portal/page/portal/AIB_HOME/EECS/EECS_Rules/EECS%20Rules%20Release%207%20v5.pdf

List of third country GOs recognised in Austria: http://www.e-control.at/portal/page/portal/medienbibliothek/oekoenergie/dokumente/pdfs/L%C3%A4nderliste_Sept_2013_en.pdf

RE-DISS Best Practice Recommendations: http://www.reliable-disclosure.org/upload/3-RE-DISS_Best_Practice_Recommendations_v2.1.pdf

Annex I – The questionnaire



Co-funded by the Intelligent Energy Europe Programme of the European Union

Questionnaire on mutual recognition

Do you have an approach for mutual recognition of GOs in place?

Yes No

Country / organisation:

Contact person

Contact details (phone/email)

Do you differentiate/intend to differentiate a recognition of renewable GOs and non-renewable GOs?

Yes No

Argumentation / Why and how?

.....
.....
.....
.....
.....

Which approach is implemented in your country, please tick or specify:

- Common decision by market participants and their agents and the Competent Authority
- Decision by Competent Authority
- Recognition of imported GOs unless potential complaints arrive
- Others, please specify:

.....
.....

Annex II – RE-DISS Qualitative Data Template

	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
Date (yyyy/mm/dd)			
GENERAL			
Disclosure system implemented	1		NO : No legislation and no system in place Almost in line: have a legislation in place but does not consider all elements required by the directive e.g. no environmental legislation YES : legislation in place + all elements disclosed
- Legislation	1		Please name the relevant regulations and provide an internet reference (preferably a version in English)
- When did the regulation(s) regarding disclosure come into force?			Please name the date in which the regulation(s) came into force.
- Do you have an electronic system for GOs in place?			Please specify
- Additional technical guidelines used in the MS (not mandatory)	depends		Please name the relevant documents, the author of the document (regulator, industry of x, for example) and provide an internet reference
- Competent Body (who is and since when?)	1		Please specify and provide reference to legal nomination and the date since when the body was appointed
RE-GO system implemented	1		NO : no secondary legislation and no system in place Almost inline : secondary legislation in place but no registry YES : Secondary legislation in place + registry
- Legislation	1		Please name the relevant regulations and provide an internet reference
- Competent Body (who is and since when?)	1		Please specify and provide reference to legal nomination and the date since when the body was appointed
- Is the appointed Competent Body the only competent body in your domain for GOs?	1		Please specify
CHP-GO system implemented	3		NO : no secondary legislation and no system in place Almost inline : secondary legislation in place but no registry YES : Secondary legislation in place + registry
- Legislation	1		Please name the relevant regulations and provide an internet reference
- The Cogeneration Directive 2004/8/EC also provides for the use of guarantees of origin by energy suppliers as proof that electricity has been produced by high-efficiency cogeneration plants but, to avoid the possibility of double-counting, those issued to cogeneration plants consuming renewable energy may not be used to disclose as renewable the source of such energy. (Preamble (55))	1		YES: there is a system in place that details an electronic energy certificate that meets the requirements of the Directive for cogeneration guarantees of origin (CHP GOs), clearly identifying their intended usage as being limited to disclosure of energy produced by cogeneration plants. NO: There is not a system for CHP-GO
- Competent Body (who is and since when?)	1		Please specify and provide reference to legal nomination and the date since when the body was appointed

Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
	GO is an electronic document which has the sole function of providing proof to the final consumer that a given share or quantity of energy was produced from RES as required by Directive 2003/54/EC.	1	YES: in the Domain GO is defined as such (electronic energy certificate that meets the requirement of the Directive for RES-GO) NO: in the Domain GO is not defined as such NA: No RES-GO system in place
Implementation of Article 15 of the Directive			
	1. The country has a GO system implemented that ensures that the origin of electricity produced from RES can be guaranteed as such within the meaning of the RES Directive, in accordance with objective, transparent and non-discriminatory criteria	1	YES: The emphasis is on the first part of the sentence. If the Domain has a system of transferable electronic certificates which complies with the definition of RES GOs provided in the RES Directive. If the system in place is EECS then the answer is YES. Almost in line: there is a legal system implemented but it is not fully working (or it is legally created but not in operation) NO: if the domain does not have a system in place of transferable electronic certificates which comply with the definition of RES GO according to the RES Directive. NA: If the domain does not have a RES-GO system
	2. A GO is issued in response to a request from a producer of electricity from RES	2	YES: the Domain has a system that allows GOs to be issued in response to a request from a producer of renewable energy. If the system in place is EECS then the answer is Yes. NO: The Domain does not have a procedure stating that a GO is issued upon the request from a producer of electricity from RES
	A GO shall be of the standard size of 1 MWh	1	YES: The GO is of standard size of 1 MWh. If issued under EECS then the answer is Yes. NO: the GO is issued for a different unit size of electricity produced from RES. Almost in line: Issued in the national system under any other unit, but transferred (exported) under 1 MWh NA: there is no GO system in place.
Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
14 & 15	There should be no issuing of more than one GO for the same unit of electricity.	1	YES: if the system in place only allows the issuance of a unique GO for a given unit of electricity produced. If the system is EECS then the answer is Yes. NO: if more than one GO can be issued for the same unit of electricity NA: No GO system in place
17, 23, 24, 25, 28, 29, 30, 31, 36	MS shall ensure that the same unit of energy from RES is taken into account only once	1	YES: Domains should ensure that GO + RTS + residual mix+ clarification of link of GOs with support schemes is taken into consideration and is not double counted in different systems for electricity disclosure. This question relates to BPRs 17, 23, 24, 25, 28, 29, 30, 31, 36, if these are Yes then the answer for the question is Yes as well. NO: if there is double counting of attributes. NA: RES- GO system not in place
	The GO shall have no function in terms of a MS's compliance with Article 3. Transfers of GO, separately or together with the physical transfer of energy, shall have no effect on the decision of Member States to use statistical transfers, joint projects or joint support schemes for target compliance or on the calculation of the gross final consumption of energy from RES in accordance with Article 5.3.	2	YES: GOs shall only have the function of being used for disclosure.. (verify in legislation) NO: GOs are used for other functions besides disclosure. NA: There is no GO system in place.

Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
3	3. Any use of a GO shall take place within 12 months of production of the corresponding energy unit.	2	Definitions of "USE" may vary in the domain as the Directive does not define it clearly. Thus the answer should be: YES: If the system in place provides expiry of the GO after a period of time defined by the Domain in whose registry they resign. If the system is EECS then the answer is Yes as well as if the answer in BPR3 is Yes. NO: if the system does not conform to the above. NA: if there is no GO system in place. <i>The descriptions should at least specify:</i> - Meaning of "use" (cancellation & transfer, application to a disclosure period, ...?) - reference start time life time of the GO (e.g. end of production period) - extent of the lifetime period of a GO (usually 12 months) - possible fix settlement dates (e.g. 31. March X+1)
	A GO shall be cancelled once it has been used.	1	YES: if in the system in place the GO is cancelled after it has been used for disclosure. NO: if in the system in place the GO is not cancelled after being used for disclosure. NA: if there is no GO system in place.
	4. MS or designated competent bodies shall supervise the issuance, transfer and cancellation of GOs.	1	YES: the system in place in the domain has a Competent Body legally assigned for the issuance, transfer and cancellation of GO and the name of the competent body appears on the GO. If the system is EECS then the answer is Yes. NO: the domain has a RES-GO system in place but no competent body assigned. NA: the Domain does not have a RES-GO system in place.
	The designated competent bodies shall have non-overlapping geographical responsibilities, and be independent of production, trade and supply activities.	1	YES: the competent body of the Domain conform to this. If the system in place is EECS then the answer is Yes. NO: if the above is not true NA: there is no RES-GO system in place.

Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
	5. Member States or the designated competent bodies shall put in place appropriate mechanisms to ensure that GO shall be issued, transferred and cancelled electronically	1	YES: The domain has a legislation that puts in place the appropriate mechanisms to ensure that a GO is issued, transferred and cancelled electronically. NO: the system in place does not conform to the above. NA: there is no RES-GO system in place
	and are accurate, reliable and fraud-resistant.	1	YES: The domain has a legislation that puts in place a GO that is reliable and fraud-resistant. If the system in place is EECS then the answer is Yes. Almost in line: if some of the criteria are used (see the criteria below). NO: the system in place does not conform to the above. NA: there is no RES-GO system in place <i>The system is reliable and fraud resistant if the following criterias are observed:</i> - GO is issued based on actual meter readings - GO is only issued for RES-E which is then used by end-consumers (i.e. no pumped hydro) - There are mechanisms implemented for ongoing control of registered data (e.g. re-audits, random checks, ...) - RES share of combustion plants is assured by adequate measures - IB can correct errors in issued GOs - technical changes to plants are registered in the short term <i>(please indicate in the description column the criteria that the system respects)</i>

Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
6. A GO shall specify at least:			
(a) the energy source from which the energy was produced	1		YES: if the GO specifies the energy source from which the electricity was produced. If EECS the answer is Yes. NO: if it does not specify the energy source. NA: No RES-GO system in place <i>Description should include the fuel categories which are used, or at least a reference.</i>
and the start and end dates of production;	1		YES: If the GO specified the start and end dates of production. If EECS the answer is Yes. NO: if it does not specify NA: if no RES-GO system is in place.
(b) whether it relates to:			
(i) electricity; or	1		YES: If the GO specified that relates to electricity. If EECS the answer is Yes. NO: if it does not specify NA: if no RES-GO system is in place.
(ii) heating or cooling;	1		YES: If the GO specified that relates to heating and cooling. NO: if it does not specify NA: if no H/C-GO system is in place.
(c) the identity, location, type and capacity of the installation where the energy was produced;	1		YES: If the GO specifies the identity, location, type and capacity of the installation where the electricity is produced. If EECS the answer is Yes. NO: if it does not specify NA: if no RES-GO system is in place.
(d) whether and to what extent the installation has benefited from investment support, whether and to what extent the unit of energy has benefited in any other way from a national support scheme, and the type of support scheme;	1		YES: If the GO specifies whether and to what extent the installation has benefited from investment support, whether and to what extent the unit of energy has benefited in any other way from a national support scheme, and the type of support scheme. If EECS the answer is Yes. NO: if it does not specify NA: if no RES-GO system is in place. <i>Description should ideally include a description on how "extent of support" is interpreted (at least for non-EECS domains)</i>
Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
(e) the date on which the installation became operational; and	1		YES: If the GO specifies the date on which the installation became operational. If EECS the answer is Yes. NO: if it does not specify NA: if no RES-GO system is in place.
(f) the date and country of issue and a unique identification number.	1		YES: If the GO specifies the date and country of issue and a unique identification number. If EECS the answer is Yes. NO: if it does not specify NA: if no RES-GO system is in place.
7. Where an electricity supplier is required to prove the share or quantity of energy from RES in its energy mix for the purposes of Article 3(6) of Directive 2003/54/EC, it may do so by using its GO.	1		YES: the domain uses GO. NO: the domain does not use GO <i>Domain description should specify whether GO use is mandatory for RES, explicitly allowed or simply not excluded.</i>
8. The amount of energy from renewable sources corresponding to GO transferred by an electricity supplier to a third party shall be deducted from the share of energy from renewable sources in its energy mix for the purposes of Article 3(6) of Directive 2003/54/EC.	1		YES: if the domain does have a procedure for deducting the transferred GO from the energy mix (if the Domain uses of residual mix the answer is Yes). NO: if the domain does not have a procedure for deducting the transferred GO from the energy mix. NA: If the domain does not have a RES-GO system in place
9. MS shall recognise GO issued by other MS in accordance to this Directive exclusively as proof of the elements referred to in paragraph 1 and paragraph 6(a) to (f). A MS may refuse to recognise a GO only when it has well-founded doubts about its accuracy, reliability or veracity. The MS shall notify the Commission of such a refusal and its justification.	2		YES: If the Domain has in place a procedure to recognise GO from other client (criteria of mutual recognition) NO: If the domain does not have a procedure for that. NA: if the domain does not have a RES-GO system in place

Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
Optional requisites included in the Directive - This can be useful information to be inserted in the Country Profile.			
	Besides issuing GOs for electricity produced from RES, MS may arrange for GO to be issued in response to a request from producers of heating and cooling from RES		YES: if the Domain issues GO to H/C producers NO: If the Domain has a H/C-GO system in place but does not issue GOs upon request from the producers NA: If the Domain does not have a H/C-GO system in place
	Such an arrangement may be made subject to a minimum capacity limit		YES: if the Domain has H/C - GO system in place and has minimum capacity limit for issuing GOs NA: No H/C GO system in place If yes please indicate in the description the limit established.
	Member States may provide that no support be granted to a producer when that producer receives a GO for the same production of energy from RES.		Please describe how MS deal with this.
	11. A MS may introduce, in conformity with Community law, objective, transparent and non-discriminatory criteria for the use of GO in complying with the obligations laid down in Article 3(6) of Directive 2003/54/EC.		If the domain has this, please describe how it is actually implemented.
	Where energy suppliers market energy from RES to consumers with a reference to environmental or other benefits of energy from renewable sources, MS may require those energy suppliers to make available, in summary form, information on the amount or share of energy from RES that comes from installations or increased capacity that became		If the domain has this, please describe how it is actually implemented.
Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
ID RE-DISS BPR			
12th Month Rule			
1a	Metered production periods for issuing GOs should not be longer than a calendar month.	3	NO : metered periods for issuing GOs are longer than a calendar year YES : If the statement is true NA: No GO system in place Nota Bene : in case only RES GOs implemented only assess RES-GO system
1b	Metered production periods for issuing GOs should not run across the start and end of disclosure periods	3	NO : Metered periods for issuing GO run across the start and end of disclosure periods. YES : If the statement is true NA: No GO system in place Nota Bene : in case only RES GOs implemented only assess RES-GO system
2	If possible, issuing of GOs should be done DIRECTLY after the end of each production period	4	NO : more than 6 months after the end of the production period Almost in line : between 3 and 6 months after the PP YES : within 3 months after the production period NA : no GO system in place
3a	Lifetime of GO should be limited to 12 months after the end of the production period.	2	NO : the proposal is not true YES : proposal is true NA: No GO system in place Nota Bene: in case only RES GOs implemented only assess RES-GO system In the description section, please identify if this is true for other GO systems in place as well
3b	GOs that have reached this lifetime should be collected into the Residual Mix	3	NO : the proposal is not true YES : proposal is true NA: No GO system in place Nota Bene: in case only RES GOs implemented only assess RES-GO system In the description section, please identify if this is true for other GO systems in place as well
4	An extension to this lifetime can be granted if a GO could not be issued for more than [six] months after the end of the production period for reasons which were not fully under the control of the plant operator. In this case, the lifetime of the GO might be extended to [six] months after issuing the GO.	4	NO : no such provision foreseen in secondary legislation or regulation Almost in line : common practice but no legislative provision in place YES : provision in place NA: NO GO system in place

Assessment of the implementation of the BPR			Domain Name:	
ID	Implementation of the elements of the Directive Related to GOs	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
Definition				
5a	Cancellations of GO relating to production periods in a given year X which take place until a given deadline in year X+1 should count for disclosure in year X. Later cancellations should count for disclosure in year X+1. (In case that disclosure periods differ from the calendar year (see item [31]), the deadline should be defined accordingly.)	3	2	Answer is YES or NO "Almost in line" should not be used Nota Bene : in case only RES GO is implemented only assess RES-GO system NA: No GO system in place <i>Please provide details of the system in place in the Domain.</i>
5b	Deadline is set on 31 March X+1	4	2	YES: Deadline is the stated one NO: Different Deadline <i>If other, Please state the deadline in the description column.</i>
6	The same allocation rule should apply for expired GO (see item [3]): The date of expiry thus determines the disclosure period for which information from expired GO will be used.	4	3	"Almost in line" should not be used Nota Bene : in case only RES GOs implemented only assess RES-GO system NA: NO GO system in place
Usage of EECS				
7	The implementation of GO in all countries in Europe should be based on the European Energy Certificate System (EECS) operated by the Association of Issuing Bodies (AIB). In case that national GO systems are established outside the EECS, then EECS should at least be used for transfers between registries.			NO : transfers of GOs between registries are not done through EECS YES : transfers of GOs between registries are done through EECS Almost in line : should not be used NA : No GO system in place
7a	Is the GO system in the country established exclusively according to EECS?	3		YES: If the proposal is true Almost in Line: both national GO and EECS system NO: if the proposal is not true
7b	Does the domain utilises the AIB Hub for international transfers?	2		Yes: if the proposal is true Almost in Line: also use other systems for transfer of GO besides the AIB Hub No: if the proposal is not true
Assessment of the implementation of the BPR			Domain Name:	
ID	Implementation of the elements of the Directive Related to GOs	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
Definition				
8	In case that not all European countries are members of EECS, appropriate connections between the EECS system and non-EECS members as well as in between different non-EECS members will need to be established. These include inter alia procedures for assessing the reliability and accuracy of the GO issued in a certain country and interfaces for the electronic transfer of GO.	2		NO : no procedure to assess reliability and accuracy of GO YES : procedures in place to assess reliability and accuracy of GO Almost in line : should not be used NA: No GO system in place
9	So-called ex-domain cancellations of GO, where a GO is cancelled in one registry and a proof of cancellation is then transferred to another country in order to be used there for disclosure purposes, should only be used if there is no possibility for a secure electronic transfer and if there is an agreement on such ex-domain cancellations between the competent bodies involved. Statistical information on all ex-domain cancellations should be made available in order to support Residual Mix calculations.	4		NO : none of the two proposals are true Almost in line : one of the proposals is true YES : Both proposals are true NA: No GO system in place Nota Bene : in case only RES GOs implemented only assess RES-GO system
Issuing of GOs for different energy sources and generation technologies				
10	GOs should generally be issued only for the net generation of a power plant, i.e. gross generation minus the consumption of all auxiliaries related to the process of power production. For hydro power plants involving pumped storage this means that GOs should be issued only for the net generation which can be attributed to natural inflow into the reservoir.	2		NO : if the proposal is not true YES : if the proposal is true Almost in line: should not be used NA : no GO system in place
11	The GO system should be extended beyond RES & cogeneration to all types of electricity generation.	4		NO : no extension YES : extension planned or in place Almost in line should not be used NA : no GO system in place

Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
12	All types of GO should be handled in one comprehensive registry system per country. (For an exception from this recommendation see the coexistence of national GO systems and EECS)	2	Almost in line: if more than one registry, but closely coordinated YES: one comprehensive registry NO: Different registries
13	All GO should be linked to disclosure.	1	YES : all GOs are linked to disclosure Almost in line : if at least RES GO system is linked with disclosure, but others not clearly NO : no GO system is linked to disclosure NA : not possible
14 a	There should be no issuing of more than one GO for the same unit of electricity. (this is from the Directive see paragraph 2 of the Directive)	1	YES: if the system in place only allows the issuance of unique GO for a given unit of electricity produced. If the system is EECS then the answer is Yes. NO: if more than one GO can be issued for the same unit of electricity NA: No GO system in place Same answer as in line 26
14 b	If multiple certificates are to be issued, e.g. a GO for disclosure and a support certificate for management of a support system, then these should be legally separated.	3	NO : not legally separated YES : legally separated NA: no multiple certificates
15 a	This also applies to CHP plants which are using RES as the energy source: Only one GO should be issued per unit of electricity	1	YES: if the system in place only allows the issuance of unique GO for a given unit of electricity produced. If the system is EECS then the answer is Yes. NO: if more than one GO can be issued for the same unit of electricity NA: No GO system in place
15 b	This GO should combine the functionalities of a RES-GO and a cogeneration GO.	4	NO : the GO does not combine both informations (lost of one information). YES : the GO combines both RES and CHP in one GO NA: No GO system in place
Assessment of the implementation of the BPR			Domain Name:
	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
ID Implementation of the elements of the Directive Related to GOs			
Definition			
	<i>GO as the unique "tracking certificate"</i>		
16	In the medium to longer term, GO should be the only "tracking certificate" used. Any other tracking systems of a similar purpose and function as GO should be closely coordinated with GO and eventually converted to GO.	2	YES : GO is the only tracking certificate Almost in line : coordination between GO and other certificate NO : no coordination between the 2 systems NA : No GO system in place
17	Besides GO, only Reliable Tracking Systems (which may include contract based tracking) and the Residual Mix should be available for usage for disclosure. No other tracking mechanisms should be accepted.	1	YES : GO + RM or GO + RM + RTS NO : GO + other tracking system which is not a RTS + (RM) NA : no GO system in place
18	Green power quality labels should use GO as the unique tracking mechanism.	4	either YES or NO or NA if no green power label or no GO system Almost in line should not be used
19	European countries should clarify whether and under which conditions the use of GOs by end consumers is allowed. Such GO use should not be based on ex-domain cancellations performed in other countries. If consumers are allowed to use GOs themselves, a correction should be implemented in the disclosure scheme which compensates for any "double disclosure" of energy consumed.	4	YES: clear regulation (pls. Specify) NO: no clear regulation
<i>Recognition of GO imported from other countries</i>			
20	Any rejection should only relate to the actual use of cancelled GO for disclosure purposes in the respective country and should not restrict the transfers of GO between the registries of different countries.	4	YES : rejection does not prevent import NO : rejection prevents import "Almost in line" is not possible NA : no rejection of GO foreseen in the legislation
21	Within the rules set by the respective Directives, Member States should consider to reject the recognition of GO from other countries for disclosure in case that these countries have not implement adequate measures which avoid double counting, e.g. a proper determination of a Residual Mix for disclosure	4	NO : no rejection criteria YES : Rejection criteria have been listed Almost in line : Rejection criteria being discussed NA is not possible

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Disclosure Schemes and other Reliable Tracking Systems			
22	Full disclosure schemes should be implemented, including the disclosure of CO ₂ emissions and radioactive waste.	1	YES or NO or Almost in line if only CO ₂ or Nuclear waste or other restriction (e.g. only provided on website and not with bills and information material) NA is not possible. <i>In the description column please specify:</i> - If the answer is almost in line, please describe the attribute that is missing (or any other restriction). - Please insert the energy sources (fuels) that have to the distinguished. - Also specify if certain attributes are allocated as "unknown" share in the fuel mix?
23	Other Reliable Tracking Systems (RTS) should be defined where appropriate based on criteria of added value, reliability and transparency	2	YES: if either RTS are appropriately defined or if no RTS is accepted for both supplier and product mix Almost in line : If progress has been made compared to E-TRACK II or when proposal is true for supplier mix but not for product mix NO : RTS are not appropriately defined (i.e., not all possible tracking systems are unreliable) NA : not allowed
24	RTS can comprise, where applicable: - Homogeneous disclosure mixes for regulated market segments where no choice of supplier or different products exists, - Support systems whose interaction with disclosure requires a certain allocation of the attributes of supported generation (e.g. a pro-rata allocation to all consumers in a country where RES electricity is supported by a feed-in tariff), - Contract based tracking	2	NA : if BPR21 is NO YES : if BPR21 is YES Almost in line : if BPR21 is Almost in line NO is not allowed
Assessment of the implementation of the BPR			Domain Name:
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Definition			
25	All countries should provide a Residual Mix (RM) as a default set of data for disclosure of energy volumes for which no attributes are available based on cancelled GO or based on other Reliable Tracking Systems. The use of uncorrected generation statistics (e.g. on national or UCTE, Nordel etc. levels) should be avoided.	1	YES : proper RM calculation, or fully explicit tracking system applied based on GO and RTS Almost in line : default set of data avoiding double counting of RES attributes; or fully explicit tracking system applies, but not fully based on GO and RTS NO : No RM NA : no disclosure system in place (only allowed for E-TRACK II)
26a	The calculation of the Residual Mix should follow the methodology developed in the RE-DISS project.	2	YES : use of RE-DISS European Residual mix or of RE-DISS national RM NO : no use of RE-DISS mixes Almost in line : and NA : not allowed
26b	As part of this methodology, competent bodies from all countries in Europe should cooperate in order to adjust their Residual Mixes in reflection of cross-border transfers of physical energy, GO and RTS.	2	YES : if the proposal is true (including e.g. Data collection of RE-DISS) NO : if the proposal is not true Almost in line : and NA : not allowed
27	For purposes of this cross-border adjustment, competent bodies should use data provided by RE-DISS. They should also support the collection of input data for the related calculations by the RE-DISS project team.	1	The focus is on the first part of the sentence YES : use of RE-DISS RM data Almost in line: use of EAM data (in case of deficit domains) NO : no use of RE-DISS data NA : fully explicit disclosure system (without unknown shares)
28	As a default, the Residual Mix should be calculated on a national level. However, in case that electricity markets of several countries are closely integrated (e.g. in the Nordic region), a regional approach to the Residual Mix may be taken. This should only be done after an agreement has been concluded amongst all countries in this region which ensures a coordinated usage of the regional Residual Mix.	2	YES : coordinated regional approach or national approach NO : uncoordinated regional approach or no RM NA and almost in line not applicable

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Definition				
Contract based tracking				
29	If contract based tracking is allowed in a country, it should be regulated clearly.	2		YES : proposal true or CBT not accepted NO : proposal not true Almost in line : CBT exists and efforts have been made to regulate it NA : not allowed
30	Such regulations should ensure that - The rules of the tracking system are transparent and comprehensive and are clearly understood by all participants in the system. - Double counting of attributes and loss of disclosure information is minimised within the contract based tracking scheme and also in the interaction of the contract based tracking scheme to GO and other RTS (if applicable). As a precondition for this, the contract based tracking scheme should be able to provide comprehensive statistics about the volumes and types of electricity attributes which are tracked through it. - The relevant information for disclosure purposes should be available in time to meet the timing requirements.	2		YES : proposal true NO : proposal not true Almost in line : CBT exists and efforts have been made to regulate it NA : when CBT is not allowed
31	In cases that suppliers of electricity intend to use contract based tracking in order to fulfill claims made towards consumers regarding the origin of a certain electricity product (e.g. a green energy product), GO should be used instead of contract based tracking (see also item [36]).	2		YES : proposal true NO : proposal not true Almost in line : not possible NA : when CBT is not allowed
32	If a country implements a system where generation attributes are allocated to suppliers and consumers of electricity "ex post" based on the contracts concluded in the electricity market, then such a system should fulfill the requirements mentioned above in order to qualify as a Reliable Tracking System (see item [21]).	2		YES : proposal true or CBT not accepted NO : proposal not true Almost in line : CBT ex post exists and efforts have been made to regulate it NA : not allowed
Assessment of the implementation of the BPR				Domain Name:
ID	Implementation of the elements of the Directive Related to GOs	Importance of the BPR for Recognition (1, 2, 3, 4)	other importance	Instructions for assessment/explanations
Definition				
Timing of Disclosure				
33	Electricity disclosure should be based on calendar years.	3		YES or NO Almost in line: if calendar year + another period can be chosen NA: not allowed. <i>In the description column, if other period is used, please identify it: starting date-end date</i>
34	The deadline for cancelling GO for purposes of disclosure in a given year X should be 31 March of year X+1 (see BPR 5b).	4	2	Yes: Deadline is the stated one No: Different Deadline <i>If other, Please state the deadline in the description column.</i>
35	The timing of the calculation of the Residual Mix should be coordinated across Europe: - By 30 April X+1 all countries should determine their preliminary domestic Residual Mix and whether they have a surplus or deficit of attributes. - By 15 May X+1, the European Attribute Mix should be determined. - By 31 May X+1, the final national Residual Mixes should be published. - As of 1 July X+1 the disclosure figures relating to year X can be published by suppliers.	3		YES: if proposal is true Almost in line : First 3 deadlines are met but disclosure figures are published on a different date (from 31st May or later) NO: if proposal not true or no RM calculation NA not allowed

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Definition			
Further Recommendations on Disclosure			
36	All countries should clarify the relation between their support schemes for RES & cogeneration on the one side and GO and disclosure schemes on the other side. Where necessary, the support schemes should be defined as RTS	1	YES : clear allocation of supported attributes NO : no clear allocation of supported attributes Almost in line : not allowed NA : No GO legislation <i>In the description column please describe how supported energy is allocated to consumers in terms of disclosure.</i>
37	If support schemes in a country are using transferable certificates, then these certificates should be separated from GO	3	NO : not legally separated YES : legally separated NA: no multiple certificates <i>Same answer as in BPR 14b</i>
38	All electricity products offered by suppliers with claims regarding the origin of the energy (e.g. green or low-carbon power) should be based exclusively on cancelled GO. No other tracking systems should be allowed, with the exception of mechanisms defined by law, e.g. a pro-rata allocation of generation attributes to all consumers which is related to a support scheme (see item [221])	4	YES : only GOs accepted for green products NO : other TS accepted for green products NA : no green products on the market Almost in line : not allowed
39	Suppliers offering two or more products which are differentiated regarding the origin of the energy should be required to give product-related disclosure information to all their customers, including those which are buying the "default" product of the supplier.	2	YES or NO NA : no green products on the market Almost in line : only product mix is disclosed, but not the (mandatory) supplier mix
40	There should be clear rules for the claims which suppliers of e.g. green power can make towards their consumers. There should be rules on how the "additionality" of such products can be measured (the effect which the product has on actually reducing the environmental impact of power generation), and suppliers should be required to provide to consumers the rating of each product based on these rules	4	YES : clear rules on green products NO : no clear rules NA : no green products on the market Almost in line : not allowed
Assessment of the implementation of the BPR			Domain Name:
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Definition			
Further Recommendations on Disclosure			
41	Claims made by suppliers and consumers of green or other low-carbon energy relating to carbon emissions or carbon reductions should also be regulated clearly. These regulations should avoid double counting of low-carbon energy in such claims. A decision needs to be taken whether such claims should adequately reflect whether the energy purchased was "additional" or not.	4	YES : clear rules on green products NO : no clear rules NA : no green products on the market Almost in line : not allowed
42	In case that suppliers are serving final consumers in several countries rules must be developed and implemented consistently in the countries involved on whether the company disclosure mix of these suppliers should relate to all consumers or only to those in a single country.	4	For most countries Not Known (NK) applies if information cannot be found YES : clear rules on level of disclosure NO : known practices of international disclosure by suppliers Almost in line : some progress has been made NA : not allowed
43	The following recommendations should be followed with respect to the relation of disclosure to cooperation mechanisms (Art 6 - 11 of Directive 1009/28/EC):		
	a) If EU MS or MS or any other country agree on Joint Projects, such agreements should also clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the respective power plants	4	YES: If agreements for Joint Projects clarify the allocation of attributes NO: If the proposal is not true NA: No joint projects
	b) If EU MS agree on Joint Support Schemes, such agreements should also clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the power plants supported under these schemes	4	YES: If agreements for Joint Support Schemes clarify the allocation of attributes NO: If the proposal is not true NA: No joint projects