Consultation on options for implementation of front side disclosure aspects

Summary of formal responses

11th August 2014

Introduction

The consultation package was sent to all Competent Authorities for GO and / or disclosure, to market players and to environmental and consumer NGOs in Europe. RECS International, EKOenergy and others did forward the consultation to their members and supporting organisations. 24 answers were received within the provided response template, including 13 from public organisations, 7 from market participants and 4 from NGOs. Two public organisations (ERSE (PT) and NVE (NO)) also commented by email, but did not submit a response in the standard format, so they are not included in the summary of formal responses below. Several organisations asked for confidentiality, so no individual answers will be highlighted in this document.

Provided answers from the standard response format are summarised in charts, partly distinguishing between the different types of respondents (being market, NGO, public). A neutral and anonymous overview over provided comments is included for each section.

Table 1: List of organisations which provided a fulfilled questionnaire

Responding organisation	Type of organisation
Vattenfall	Market
ECOHZ AS	Market
RECS International	Market
EnBW Energie Baden-Württemberg AG	Market
Bischoff & Ditze Energy GmbH	Market
EIDA S.A.	Market
Sudstroum S.àr.l & Co S.e.c.s.	Market
EREF	Market
CDP	NGO
EnergieVision e.V.	NGO
Ecoenergy	NGO
National Energy Authority (Iceland)	Public
Energimarknadsinspektionen, STEM, SvK (Sweden)	Public
Bundesministerium für Wirtschaft und Energie (Germany)	Public
Ministry of Economy of the Slovak Republic	Public
Energinet.dk	Public

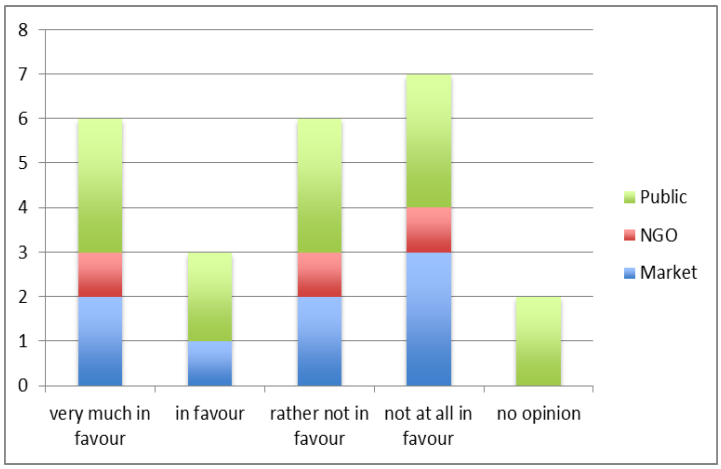
Co-funded by the Intelligent Energy Europe Programme of the European Union

Energy Authority (Finland)	Public
Institut Luxembourgeois de Régulation (ILR)	Public
SEMO (Ireland)	Public
Swiss Federal Office of Energy SFOE	Public
Transmission System Operator (Cyprus)	Public
VREG (Belgium – Flanders)	Public
Commission for Energy Regulation (Ireland)	Public
Croatian Energy Regulatory Agency	Public

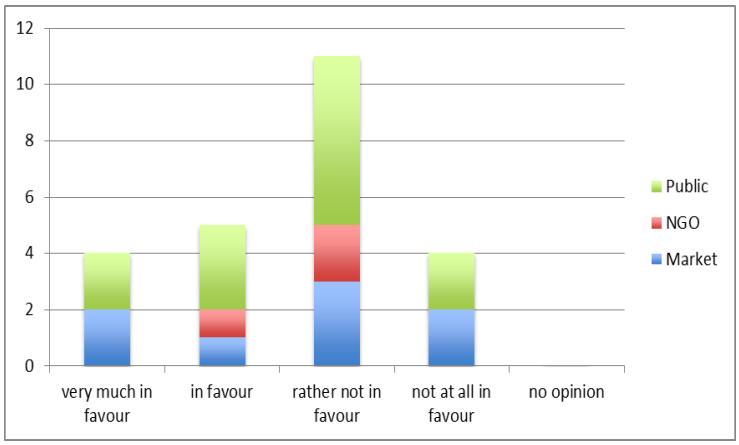
1 Disclosure of additional parameters

1.1 Shares of supported (RES) electricity

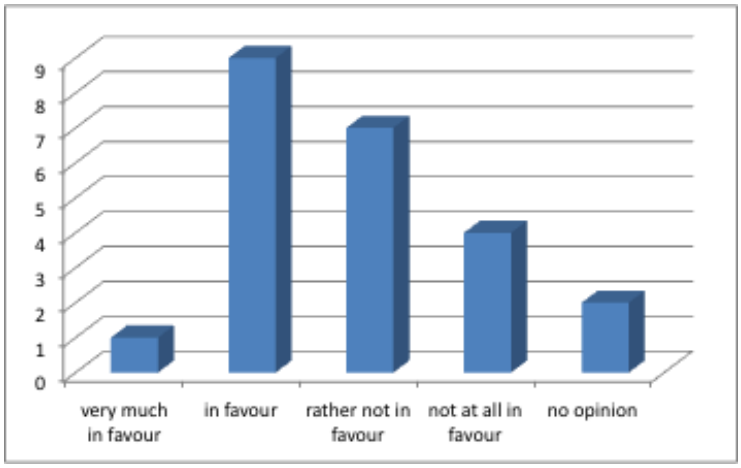
1.1.1 What is your position regarding the distinction of supported RES shares in combination with a special allocation mechanism of (national) supported RES?



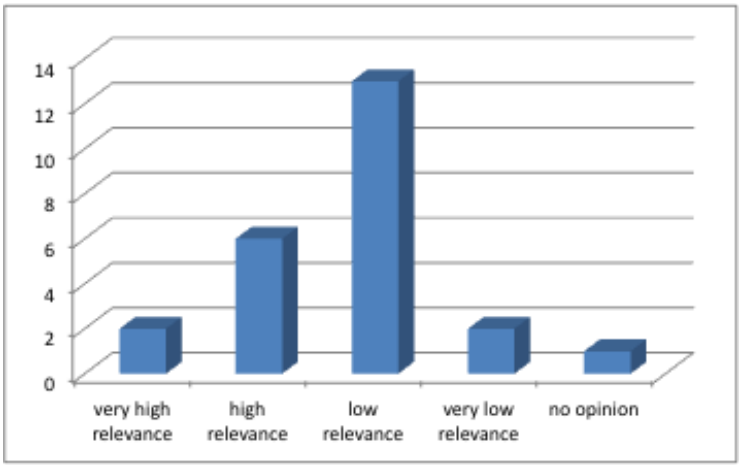
1.1.2 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



1.1.3 What is your position regarding the distinction of supported RES shares according to the status of support as documented by GOs which have been used (i.e. separate disclosure categories for supported RES and unsupported RES, but no specific allocation mechanism for supported RES)?



1.1.4 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



1.1.5 Please state in the next cell any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- For the national fuel mix disclosure it is not relevant to distinguish between non-supported and supported shares, but believes it would be more relevant to do so in the AIB statistics.
- The consumer choice is point of departure in all cases. This implies that the consumer needs to be informed about the product properly. Knowing the fact that some consumer are of the opinion that they would like to know if producers are subsidized or not, some suppliers will inform them on that point and others will not. It is a market issue and suppliers not providing that information might not be so successful. It is not an issue that should be regulated on a European level. The market participant can imagine that countries will regulate this differently.
- One market participant mentioned that in the respective country the supported electricity is mathematically included without physical transfer. That's why this country needs a different

approach. The situation would occur if with the selling of supported electricity also the characteristic would be traded, then the characteristic could directly be integrated in the disclosure statements.

- Supported GOs will be the standard for new power plants in EU-Europe (EU-Directive wants this), so it makes no sense to divide in two distinctions. Furthermore this distinction could let the costumer to be addled. The message of avoiding double-counting could be misunderstood (couldn't be taken into account).
- It would be important for consumers to know to what extent the electricity has received financial support as they are normally paying for the support schemes for green electricity already in their own country. Paying extra for electricity with a GO from another Member State where such electricity already received support would thus for many consumers be less acceptable, as they would have the feeling of paying twice. Also, there are many consumers nowadays who care about the local aspects of renewable energy (e.g. job creation, infrastructure improvements, local CO2 reductions) which would be less inclined. In order to enable consumers to make an informed decision (of where they want to support the development of renewables - at least indirectly) such disclosure would be necessary. As we would like the public, thus ultimately consumers, to support the transition to renewable energy, we should inform them as good as possible on what they are paying for and what they are getting. We also would like to insist that besides information in this distinct fashion when it comes to renewable consumers should have knowledge concerning incumbent energy sources as well.

Comments from NGOs:

- The existence or not of support mechanism is a policy decision of the country. Generally, this would complicate disclosure further and interpretation by final consumer. Most important, RE is not the only form of energy that receives support: other generation types can also receive a variety of supports as well as the fuels on which they rely. Would that be disclosed too? One assumes that if support mechanism are provided, then RE supported will be distributed fairly and proportionally between companies participating in the market. In that case, companies actively purchasing RES-GO to clean their mix, would present a differentiated offer. We think that is enough, the user does not need to know that that differentiation there is a basis which is "supported electricity" and another which is "non-supported electricity", provided "supported" is distributed on a fair basis. Then, if there are specific labels that exclude "supported electricity" one must assume they are buying RES-GO's also for the share of RES-electricity they would be entitled too. That is fine, but we believe that is necessary only for very sophisticated and very well informed consumers.
- From a consumers point of view, it is worth knowing whether they are buying a RES share which has already benefitted from public support, or a RES share which does not already benefit from such support.
- Distinction between supported and unsupported is less relevant than it looks like. It doesn't say anything about the type of support (investment subsidies?). Nor does it say something about what the consumer wants to know. Hydropower from 1908 likely doesn't get support. So it will be in the 'non-supported' category. Is that helpful for the consumer? We welcome all initiatives to brainstorm about this topic. We think this is particularly relevant in the frame of the ongoing discussions about the future of the European support schemes. But we don't think this is the right time for very "ambitious" European wide disclosure guidance on this topic.

Comments from public organisations:

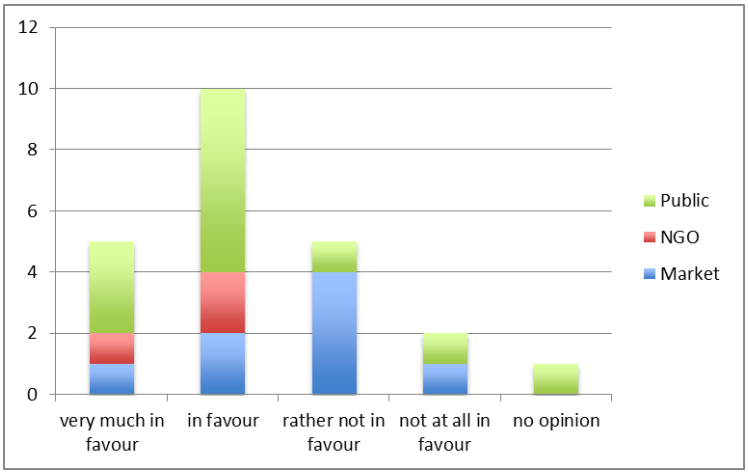
- End consumers should know if their renewable consumption received public funding or not. They should also know if they paid for this funding or if tax payers / end consumers abroad paid for it.
- Besides extra complexity, reporting will neither differentiate between investment and production support, nor will it provide details to the extent of support. Thus it will rather confuse than inform consumer.
- It is very hard to be sure that there is no support at all for the electricity production/consumption. Some investment subsidy funds only decide a few months/year after commissioning date of the production device, to supply subsidy or not; some exemption systems are complex to understand or complex to integrate in the parameter on the GO for the Issuing

Body. If transparency in receiving support is so hard to obtain, it is not always trustworthy what the parameter 'earmark flag' on the GO says regarding support

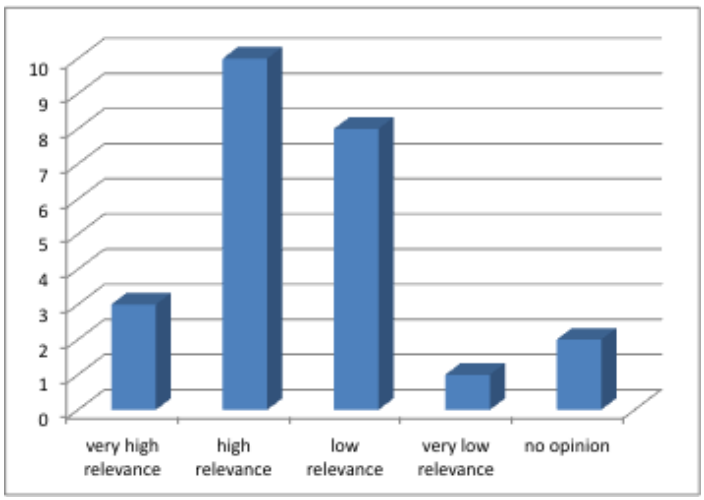
- In one specific country, generators in receipt government support must enter a contract with a licenced supplier. The nominated supplier is the interface with the government for receiving the support payments in this regard. This arrangement is transposed into national law through the Public Service Obligation levy and is updated annually to reflect new supported generators and associated suppliers. Therefore, to have a 'special allocation mechanism' of national supported RES would require legal change in this country. Also for information, generators in this country receiving support are not eligible to receive GOs for their production.

1.2 Distinction of country of origin

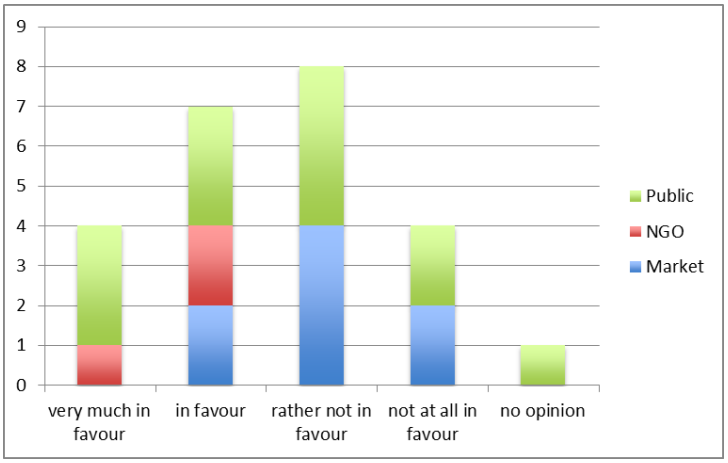
1.2.1 What is your position regarding indicating the geographic origin in electricity disclosure by specification of the share of imported electricity / GOs as compared to national production?



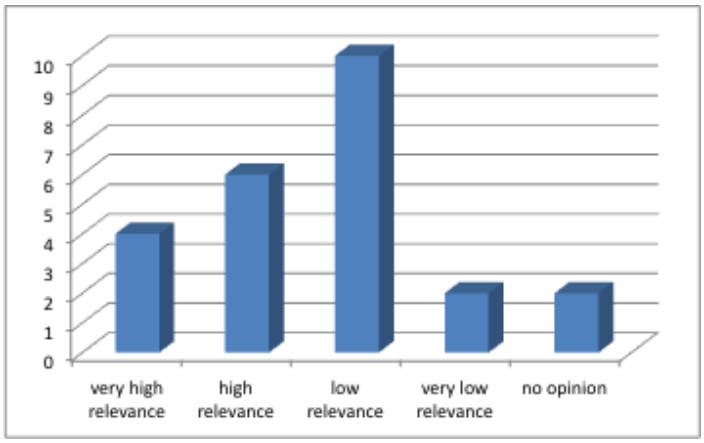
1.2.2 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



1.2.3 What is your position regarding indicating individual countries of origin in electricity disclosure?



1.2.4 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



1.2.5 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- With regard to the RES Directive 2009/28/EC the GO system is a European standardised mechanism for trade and disclosure. Although a distinction between national production and production abroad might be of interest to some energy customers it cannot be taken as an indication about quality and sustainability of the renewable energy source. From a harmonised European energy market perspective disclosure should mainly focus on distinction of fuels. Additional information regarding the country of origin can be published on a voluntary level by energy suppliers. To our mind there is neither a need to harmonise the publication of geographic origin in electricity disclosure on a European level nor to make the publication mandatory.
- For the national fuel mix disclosure we believe that it is not relevant to distinguish between non-supported and supported shares, but we believe it would be more relevant in the AIB statistics.
- The country of origin/production is of high relevance in the discussions about target accounting: imagine if cross border trade will be allowed for target counting (is currently not possible), than the country of origin is needed for corrections in reporting the targets. Secondly we can

see in many countries that consumers prefer electricity from their own country. If this is a consumer wish, the market need to accept that. Make sure that this question is asked to the consumers.

- Consumers should be able to make informed decisions. The energy mix is a source of information to consumers and they would - with a view to the indirect benefits of energy production (in particular from renewable energy sources) - have an interest in knowing where those benefits are realized, ultimately from the energy prices they pay for. Thus information about the countries from where the (renewable) energy has been imported may contribute to better information of the consumers, giving them the chance to choose the electricity products that most suit their ideas of energy supply.

Comments from NGOs:

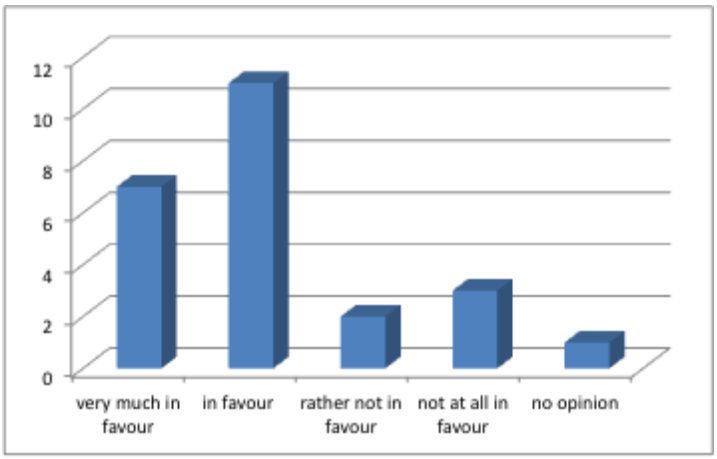
- One NGO believes that this could considerably increase the complexity of information received by the consumer. Furthermore, given that European networks interconnections need, in fact, to be strengthened, this could lead to unnecessary polemic that would not strengthen the integration of European electricity transmission networks. But, in itself, the NGO is not against this type of disclosure and it can be of interest. The question is: are we setting minimum standards or best practice? If minimum standards, then this is probably too much. If best practice, I would say it can be appropriate.
- Although climate change is a global challenge, and there is an internal European electricity market, information on country of origin can be helpful for consumers to understand the nature of their supply, and particularly give realistic information while lot of consumers still expect their supply to be "local".
- For many consumers, the place of production is relevant. We think that clear consumer information also has a 'steering effect' and will put local production in a more competitive position as compared to import.

Comments from public organisations:

- There is no reason for this information to consumers
- The question of where the "green" electricity comes from was already addressed sometimes by the end consumer
- End consumers have a right to know where their electricity comes from (also geographically). This information is needed when deciding how important geographic proximity or physical grid connection is.
- Public debates raised by NGOs and consumer organizations tend to paint all 'green electricity' as non-reliable, as they find it 'not green'/'a lie'/… . They mean that it should be 'green and produced in your own country' to call it green. If disclosure is transparent about the geographic origin, there is no need for this incorrect debate on public forum, where ignorant consumers are influenced by the highest shouting voice.
- Specifying the proportion of imported GOs should provide enough information in this regard for the majority of final customers - it is our opinion that the majority of final customers do not want to know the exact domain the GO is from. There is also a concern here that too much information might be provided to final customers if the individual country proposal was implemented.

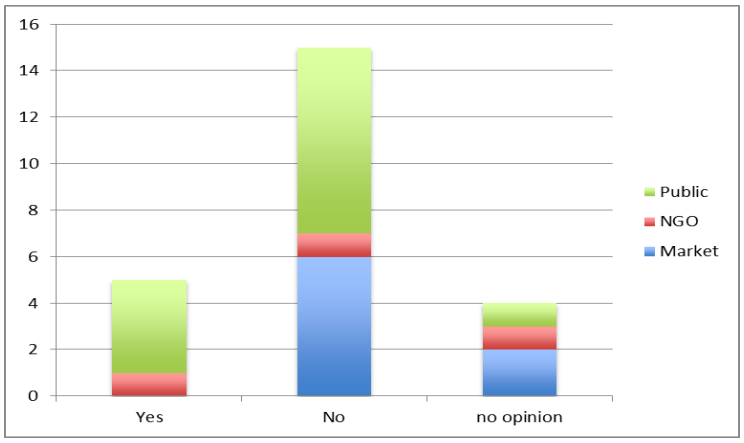
1.3 Detailed categorisation of fuels and technologies

1.3.1 What is your position regarding the distinction of fuels on a more detailed level than RES, FOS and NUC?

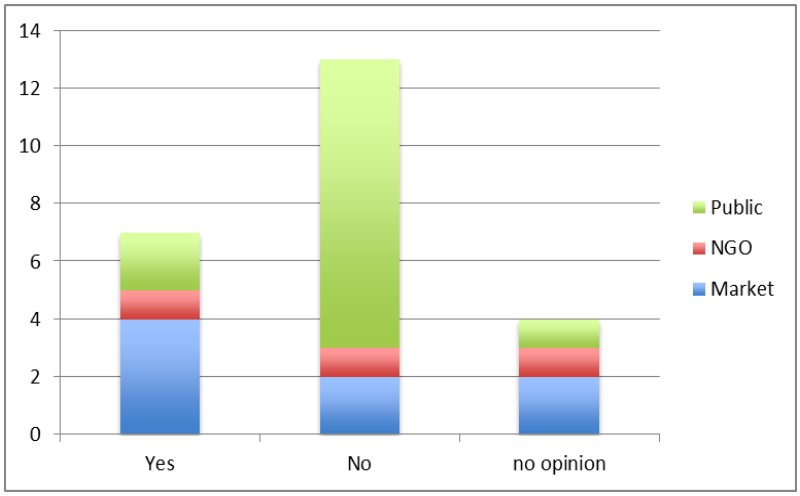


1.3.2

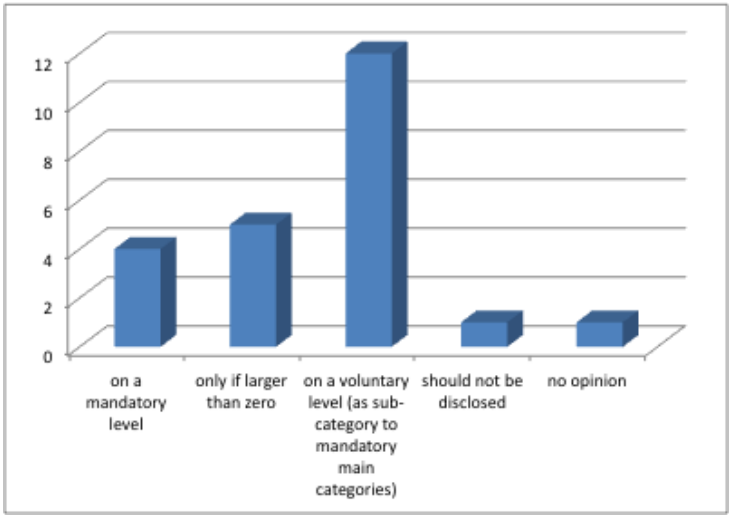
a) Would you recommend to add specific fuels to the RE-DISS list mentioned on slide 13?



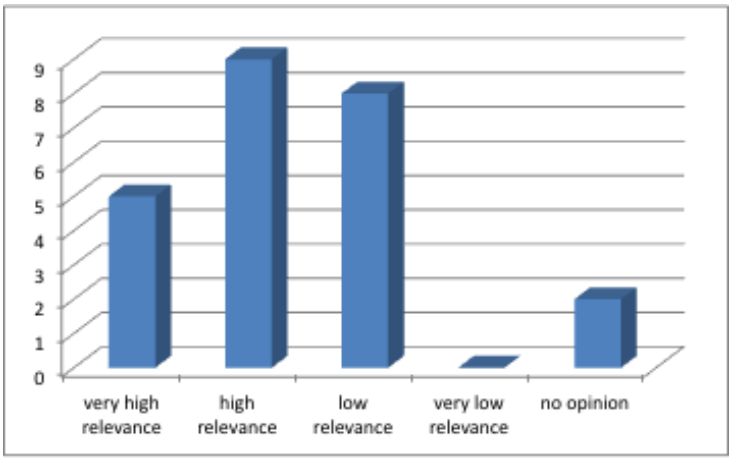
c) Would you recommend to delete specific fuels to the RE-DISS list mentioned on slide 13?



1.3.3 In your opinion, how should the individual (more detailed) categories be disclosed?



1.3.4 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



1.3.5 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- It is not so clear what is meant with 'individual (more detailed)' categories: from a consumers point of view it seems that the level of details given in answer of Q1.3.2b are relevant
- Further details require further usage and content of certificates. Without this more detailed information would not make sense as the data would not be available from the supply chain.
- More transparency in the energy mix
- Information on the fuel source may be important for consumers as well, as they may understand the different environmental impact of different (fossil) fuels (e.g. gas, coal…). Thus, more information could lead to more informed decisions.

Comments from NGOs:

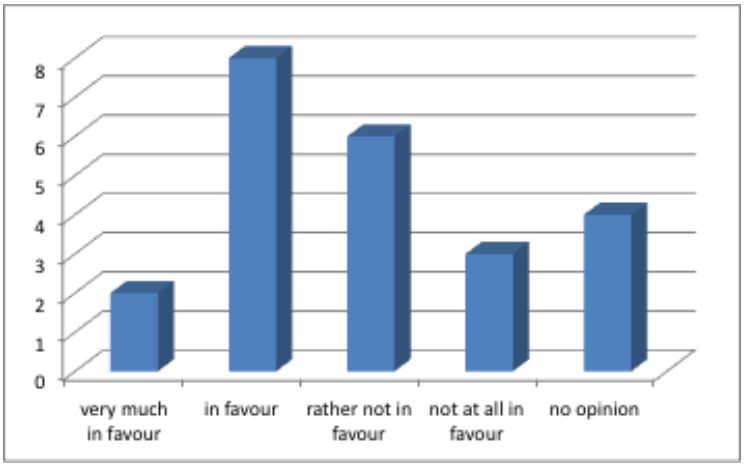
- The issue of "minimum" or best practice standards is relevant. There is a balance between comprehensive information and information overload, fatigue for consumer. We believe that a minimum amount of information, that is very easy to understand should be available to all consumers (e.g. scale like energy efficiency rate A to E), but it can then be complemented by more thorough information provided elsewhere and on a voluntary basis. We believe the specific fuel generation is very relevant - but in the end, it might actually be as relevant as origin

or support. For us is relevant because of emission impact of different generation methods, but different consumers might value this issue differently. There should probably be a survey to consumers to understand what is important for them. This will likely vary from country to country.

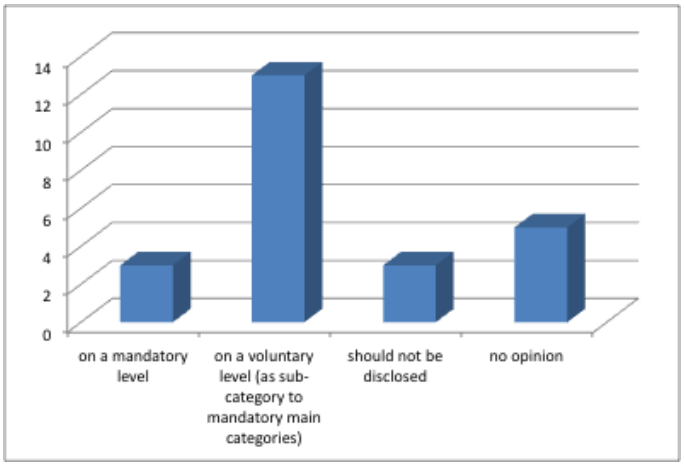
Comments from public organisations:

- It should not be possible to use the residual mix to sell specific RES electricity contracts, these should only be supported by GOs. In our country the residual mix can be used as disclosure but only for overall contracts not specific as for example solar, wind, water. It should be up to the supplier to use as detailed categories as they wish in their disclosure, but have the possibility to use as little as possible of the residual mix. Our aim is to increase GO use and decrease the amount of residual mix.
- More detailed/accurate emissions can be determined. Also relevant information for consumers.
- Reason is to bring transparency in public debate (where some voices shout f.e. that 'green' electricity is not green because biomass may in life cycle analysis result to be CO2-negative). Provide consumers choice also on the energy source in detail. Green has several sub-colours - let the consumer judge what he finds dark green.
- MSs should be required to fully disaggregate the fossil fuel constituent considering that each fossil fuel has a different CO2 figure. This allows for customer transparency with regard to suppliers fuel mixes that have a significant proportion of high CO2 intensive fuels. For similar reasons, RES disaggregation should be voluntary considering these are seen as being equal in our country with regard to CO2 emissions (carbon neutral). All categories should only be listed if greater than zero so that final customers are not over burdened with information that is not necessarily relevant to them.
- The implementation of sub-categories is highly dependent on practice across EU. If no harmonisation is done previously, any mandatory requirements will fail.

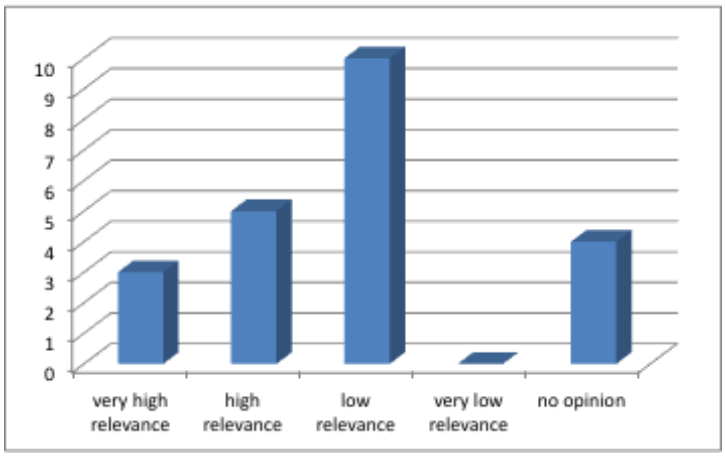
1.3.6 What is your position regarding disclosing additional information on technology (particularly overall percentage of HE CHP) besides the fuel mix?



a) In your opinion, should such information be disclosed on a voluntary or on a mandatory level?



b) Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



b) Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- These kind of questions should be asked to consumers, or to a certain extend to the organisations that represent their interest (consumer organisations). We are in favour of a pragmatic approach, by starting with a minimum level of information as described in Q 1.3.2b
- Final consumer might be overwhelmed by further details. Provision of this information should be on voluntary level for marketing purposes.
- Disclosure is not only a matter of RES-Redemption, having tracked all types of energy, I think that is the aim of E-Track.
- In the interest of consumer information and allowing consumers to make informed choices, it would be important to tell them exactly where their electricity comes from. It would allow them for example to choose HE CHP over other technologies, thereby promoting energy efficiency.

Comments from NGOs:

- Production from high efficient CHP is a production type which is very environmentally friendly, but which is not easy to communicate to end-consumers. In order to support this, it would be

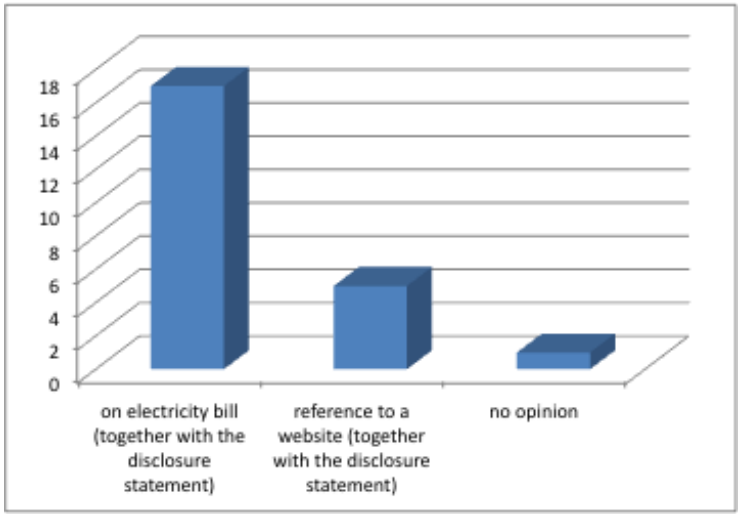
helpful to allow at least on voluntary level for an "official" and therefore confidence-building method to communicate this.

Comments from public organisations:

- The information is of very little importance to most end consumers – end customers. Too much information disclosed creates confusion. However, for those who wants a specific HE CHP contract, it should be possible to provide specific GOs by the producer.
- Technology information in addition to the fuel mix makes disclosure (even more) complicated
- Technology disclosure should be completely separated for fuel disclosure, although they may be reported on the same report. HE CHP should not be treated as a fuel source. HE CHP using RES fuels (e.g. biogas from anaerobic digestion of animal waste) can have two GOs. A RES GO for the total amount of electricity, and a CHP GP for the amount of electricity corresponding to HE CHP. The RES GO will participate in Fuel Disclosure, and the CHP GO in technology Disclosure.
- Although in our domain at the moment we disclose HE CHP on a mandatory basis, the argument that CHP is not a fuel makes sense to leave it out the fuel mix declarations. However, it is interesting to know this background for the customers who are interested.
- I am unclear to the exact meaning of this question. However I would note that for the majority of customers disclosure of fuel mix is sufficient. Too much information can be detremental to the purposes of disclosure in this regard. This should be voluntary and therefore possible to be carried out on an ad-hoc basis in Member States and for specific customers as requested.

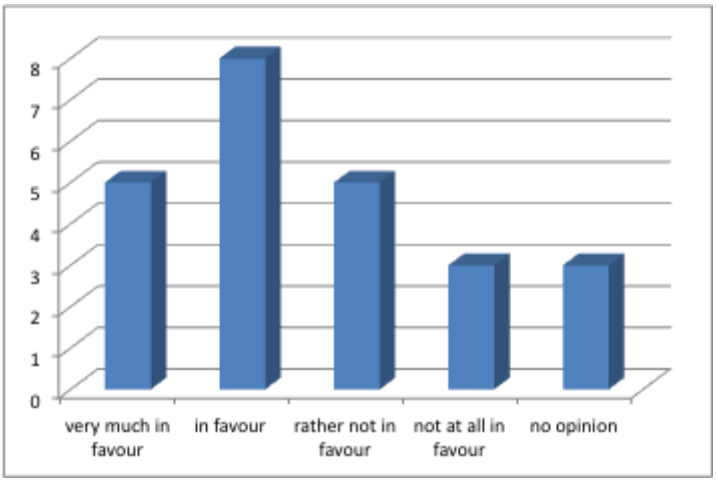
1.4 Provision of further environmental indicators

1.4.1 Should information on nuclear waste and on CO_2 emissions be disclosed together with the general disclosure statements (e.g. on the annual bill) or only being referred to (e.g. on a website)?

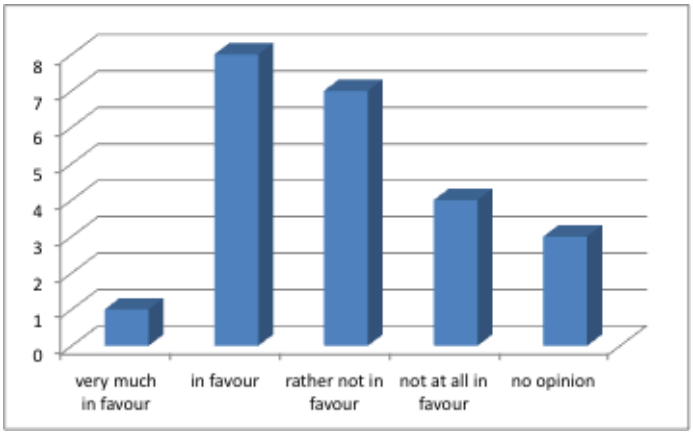


1.4.2

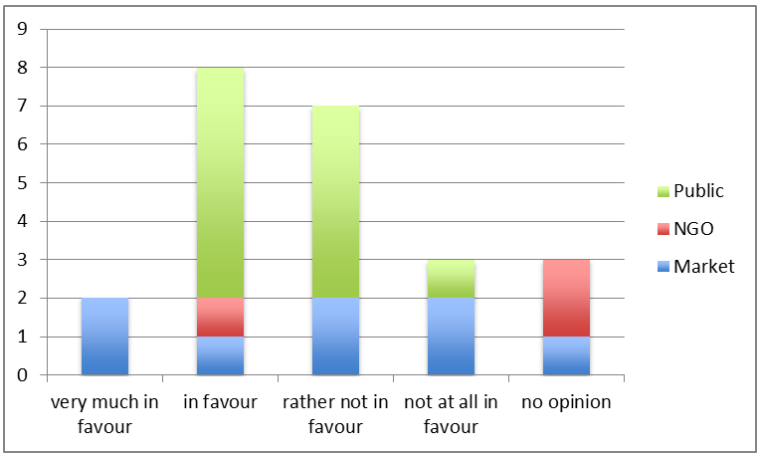
a) What is your position regarding the provision of more detailed environmental indicators besides CO_2 in general?



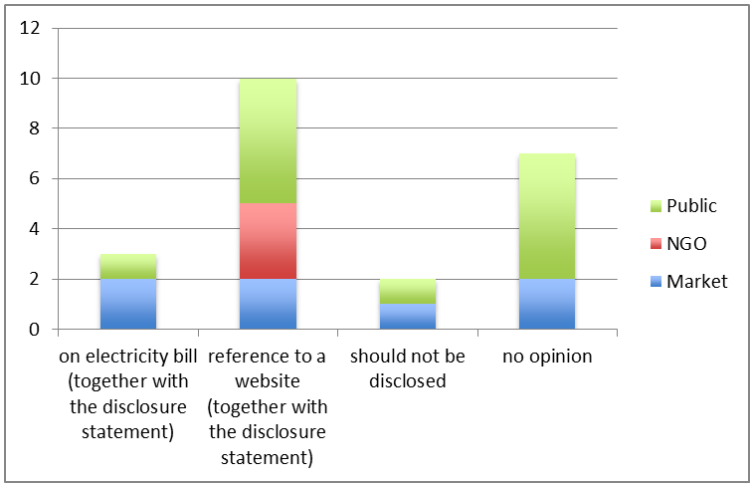
b) What is your position regarding the provision of details on other greenhouse gas besides CO_2 (e.G. CH_4, N_2O, SO_2, NOx CO, NMVOC and particles) in countries with high shares of fossil?



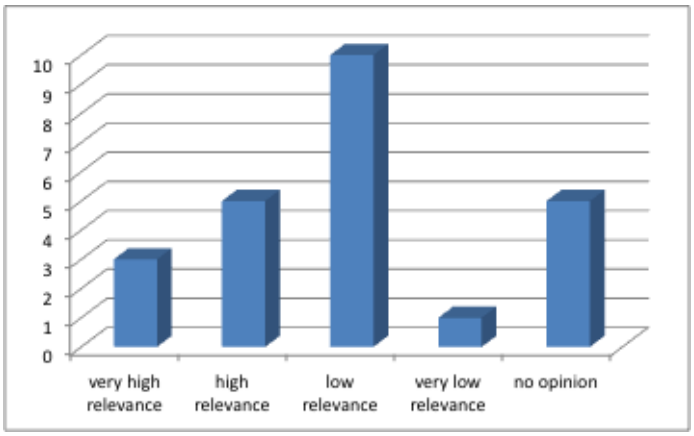
c) What is your position regarding the provision of details on e.g. comprehensive environmental footprinting, use of natural resources, land consumption, etc. in countries with high shares of RES ?



1.4.3 Should (if at all) additional voluntary information be disclosed together with the general disclosure statements (e.g. on the annual bill) or only being referred to (e.g. on a web-site)?



1.4.4 Do you consider provision of more detailed environmental indicators of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



1.4.5 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- Publishing more information on the further environmental indicators, such as, landscape conservation or consumption would make a value judgement on the level of sustainability of renewable energy sources. This can be misleading to customers on the one hand and overburden information within disclosure on the other hand.
- 1.4.2a og 1.4.2.b. on a voluntary level but with minimum requirements
- It must by all means be made clear that all environmental attributes are included in the GO (this is important to exclude the possibility of issuing another certificates for the same kWh). If all attributes are included, the consumers are well educated to make their own claims after consuming specific electricity products (e.g. zero carbon foot prints after consuming renewable electricity, based on emissions during operation)
- For fuel source disclosure this information is not relevant. Such issues should be covered by sustainability reports.
- The scope on an environmental impact and the carbon-footprint is (if possible) a good instrument for costumer communication. This attracts attention on the environmental backpack. Consequently this could be also a conclusion from GHG-P?
- Provision of such information only on the website would not create sufficient consumer information, while information on the electricity bill would really point consumers to such data. The overall environmental performance of their electricity supply may be relevant for consumer choices and should thus be disclosed. It may tell them about the results they achieve in supporting renewables as well as about the negative impact the (e.g. nuclear) fuel mix may have on the environment and thus is of high importance to create awareness and thus the basis for renewable energy promotion and support in the course of an overall energy transition.

Comments from NGOs:

- We consider providing third type of detail is highly relevant, however, we have doubts if it will be highly relevant for the "generic consumer". We think that together with the nuclear waste it is important to have the CO2e figure, so consumers understand that their consumption has an impact on one of the most pressing challenges of our generation. However, providing beyond the CO2e figure the breakdown by gas (CO2, CH4, NOx) is likely to be information overload - particularly in the energy bill. Nothing against - on the contrary all in favour - of having it in website. But this can be framed as a best practice, although we wouldn't see would bad eyes if it was made a requirement.
- In principle, provision of more detailed environmental information seems very desirable. However, information on exhaustive lists of emissions are probably only understood by a very limited number of consumers anyway. Environmental information with respect to further aspects, like e.g. comprehensive environmental foot printing, are probably that difficult to handle that differences due to methodology and input data probably lead to results which are hardly comparable. Therefore this is rather of limited help for consumers and environment as a general requirement of electricity disclosure.
- Please think about more ways to communicate and to disclose than only bill and website. Almost all suppliers have a customer's magazine, publicity, they have facebook pages, the regulator has a website and communication tools,…

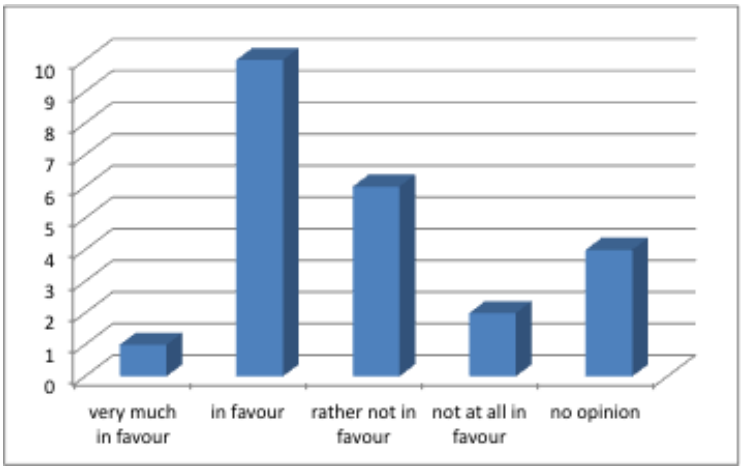
Comments from public organisations:

- Limited interest for end customer / end consumers, therefore information on website is enough.
- Environmental indicators should be kept as simply as possible.
- If environmental information is disclosed to customers in a way that they can understand (i.e. not as g/kWh or mg/kWh) then disclosure on the bill makes sense. Otherwise a website putting the information into a larger context for interested consumers would be more helpful.
- It is an efficiency gain to have a general 'European' reference for the environmental indicators, instead of publishing every country on itself some references.
- There should be sufficient information for customers to realise the environmental impact of their electricity if the FOS category is fully disaggregated and the overall CO2 figure for a sup-

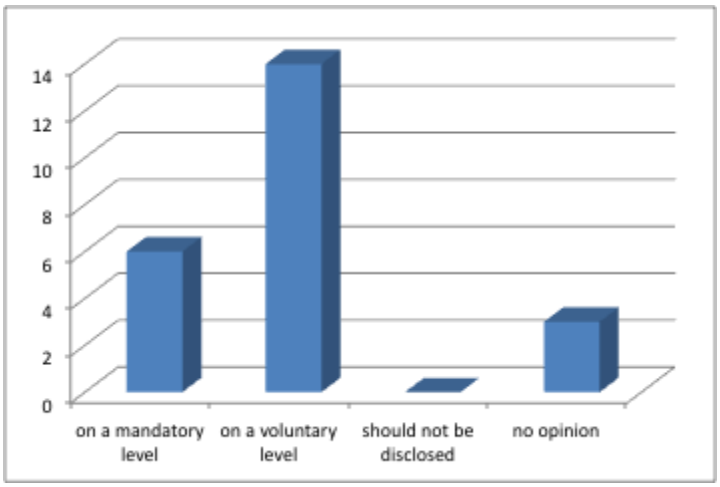
plier is given. For example, the majority of customers are aware that coal is a 'dirty' fuel compared to natural gas without having to state the CH4, N2O etc. Further as an example if it was disclosed that the FOS constituent was 100% derived from coal for a particular supplier, compared to another supplier with 100 % natural gas, environmentally aware customers can make an informed decision without this additional information stated. With regard to environmental impacts of RES such as natural resources, I am not clear to which extent this could be provided in a comprehensive manner.

1.5 Communication of additionality aspects

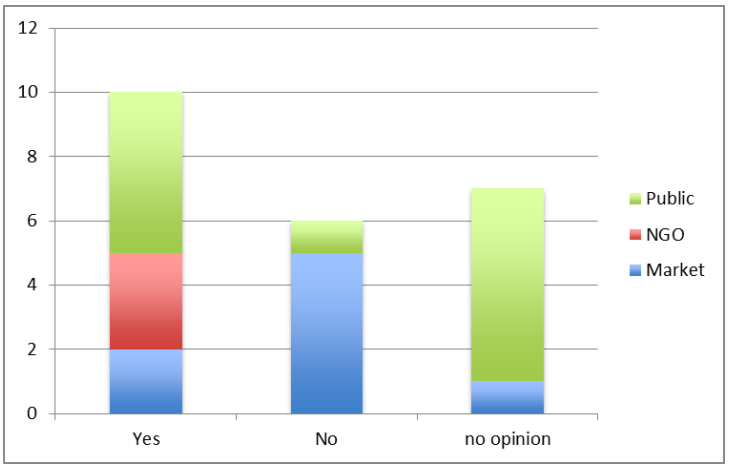
1.5.1 What is your position regarding the provision of additionality aspects together with electricity disclosure?



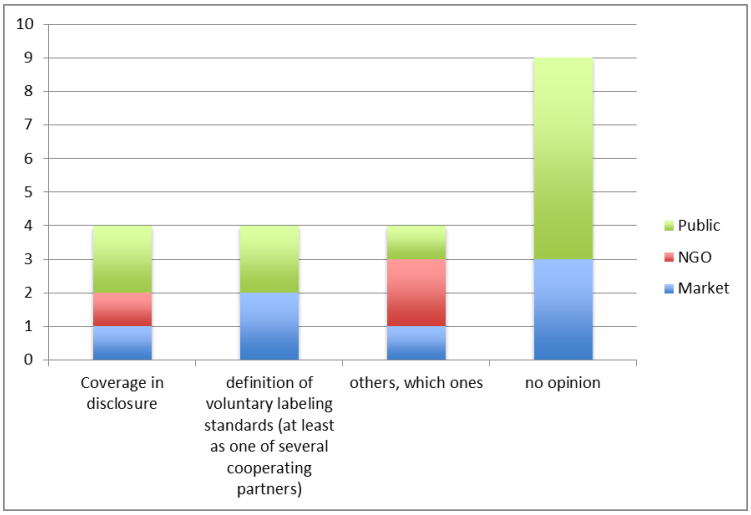
a) Should such information (if at all) be provided on voluntary or on mandatory basis for all products with ex-ante claims?



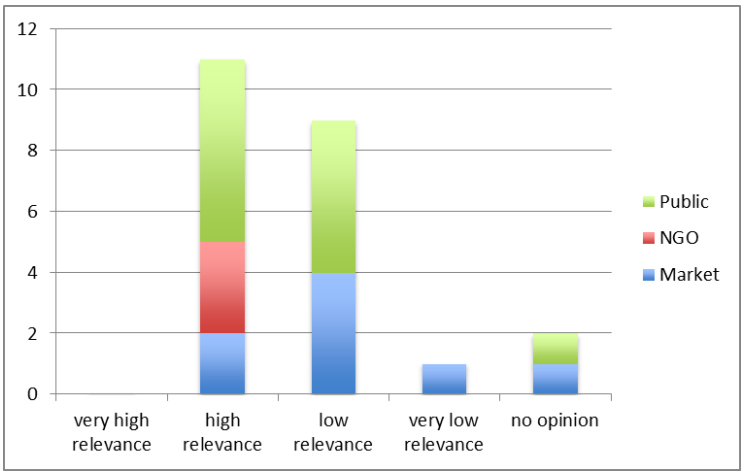
1.5.2 Do you think competent authorities should have an active role in regulating communication of additionality aspects at all?



a) If so, by which means should competent authorities be involved?



1.5.3 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



1.5.4 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- Introducing additionality aspects to renewable energy sources indirectly make a value judgement on those renewable assets that fulfil the criteria and thereby ignores other renewable plants. Applying Art. 15 para. 15 RES-Directive 2009/28/EC, i.e. only giving additionality information of renewable energy orginated from plants that operate since 25 June 2009, could result in a differentiation between "new" and other plants producing renewable energy. VWe suggest instead of introducing additionallity aspects to the supply mix to provide relevant information to enable customer to make a choice between the existing products.
- There is no such thing as additionality from a regulatory point of view. There are however many definitions used by NGO's as part of labels introduced. In case a kWh qualifies, according the criteria of a specific NGO to additionality and has been audited by that NGO, than this fact might be mentioned on the GO. In that case the consumer has a choice, having faith in the used criteria and definition of additionality or not. In this approach it is up to the NGO's to streamline the definitions used.
- It depends how additionality is defined. Is it open and flexibel concerning the aspect of surplus (i.e. several reliable approaches to define surplus) , then it is good. So it has a high relevance and is good for costumer communication. But if one criteria is too much in focus (i.e. age criteria) then this is not an objective criteria anymore and not relevant
- Disclosure only makes sense if it allows for comparison. Otherwise consumers cannot make the informed choices disclosure is aiming at. Thus additionality aspects should be provided on a mandatory level and the coverage in disclosure should be regulated by the respective authorities, in order to avoid that "uncomfortable" information is hidden.

Comments from NGOs:

- We don't particularly like discussions about additionality. We think it is important, but not as important as some claim it to be. We would prefer to avoid the word "additionality" and how it is used in the context of carbon markets. We tend to talk of electricity consumption that helps transform the energy system. We think it is important to capture some of the characteristics of that electricity, that it will differ from country to country and that it should be made only on a voluntary basis. We see a role for authorities, namely in setting guidelines/minimum standards of what can be accepted as "electricity that helps to transform the energy system". We believe that ultimately, if all consumers want to consume renewable electricity, that this will be, in itself, transformative of the energy system.
- From our position additionality is the key aspect for a good voluntary green power offer. Highlighting this aspect within mandatory disclosure would be helpful for consumers' capacity building with respect to that. However, we acknowledge that it might be difficult to practically

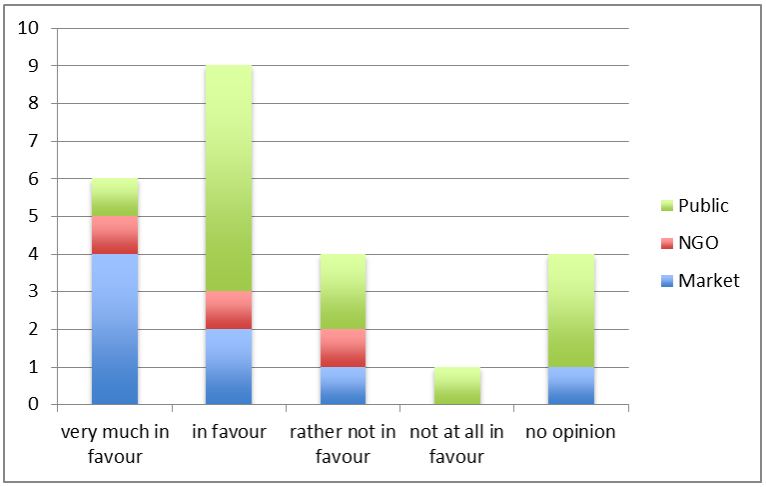
agree on a definition of additionality, and national market might put different foci, but this should at least be strived for on a national level.

Comments from public organisations:

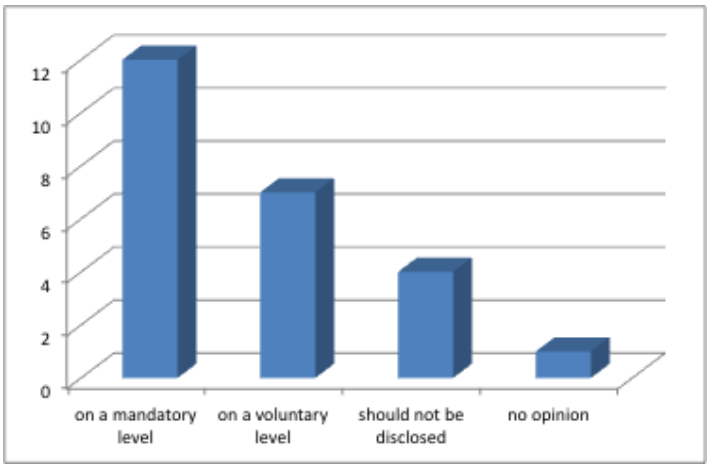
- In our country there are no regulations for labelling. It is up to the labeller to set demands. The question is if this is a question for the regulator and of interest for the disclosure system? Additional information should not be cost driving.
- For transparency reasons it is necessary that consumers know whether additionality can be realized by chosing a certain tariff or not
- In general I think additionality is a complex topic. At least some kind of standard is needed to determine different levels of "additionality"/"greeness" or to differentiate between available products in the market. Also how to check the reliability of different claims is highly important here.
- Labels backed by producer, consumer and environmental organisations are better fit to define additionality criteria than the competent authorities. However, regulation should prohibit wrong claims about additionality and integrate the voluntary use of labels.
- The term 'Additionality' has many interpretations. It is not clear to me which definition we should use to answer these questions.
- In our country, the provision of additionality has not been encountered to date. However, the current Electricity and Natural Gas Suppliers Handbook (sets out requirements for suppliers with regard to, inter alia, the provision of information, customer charters and marketing conduct. These requirements provide sufficient protection to electricity customers in this regard.

1.6 Distinction of the tracking mechanisms used

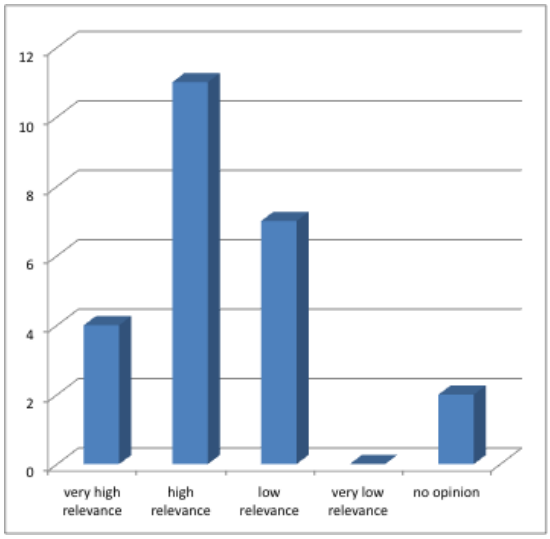
1.6.1 a) What is your position regarding the distinction of tracking instruments in disclosure statements with respect to general tracking instruments?



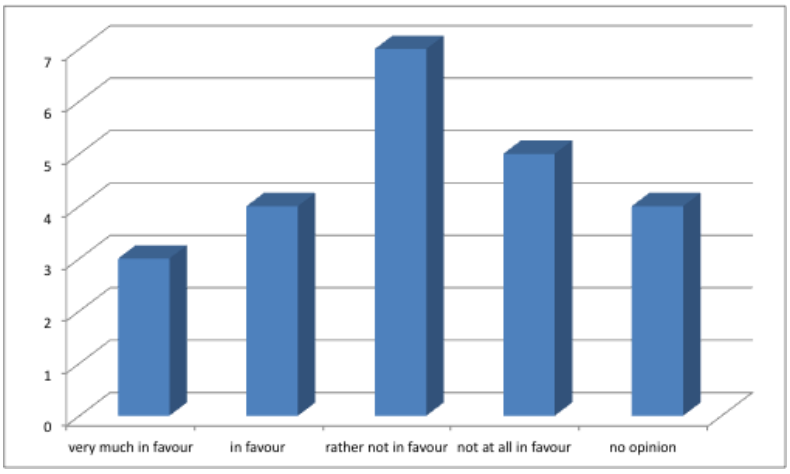
1.6.2 a) In your opinion, how should such information be disclosed?



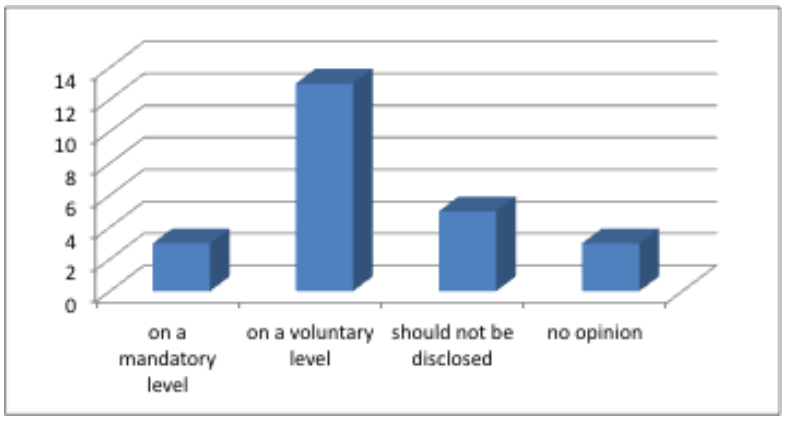
1.6.3 a) Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



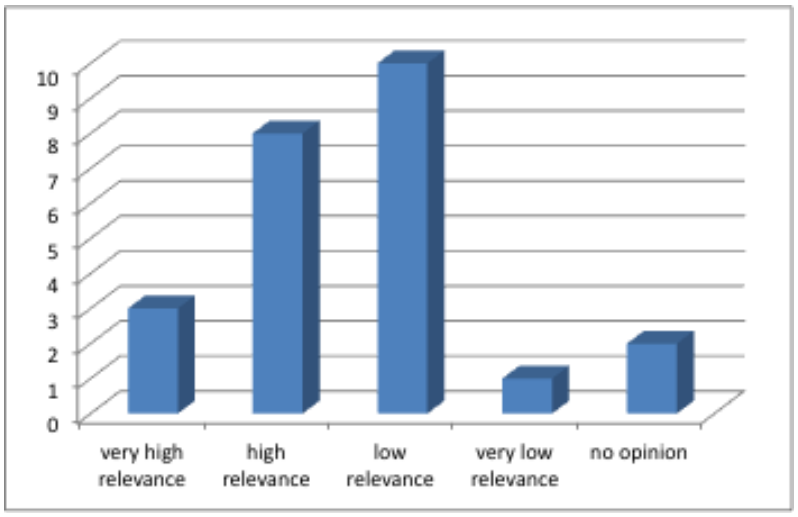
1.6.1 b) What is your opinion regarding the distinction of tracking instructions in disclosure statement with respect to linked vs. De-linked application of GO?



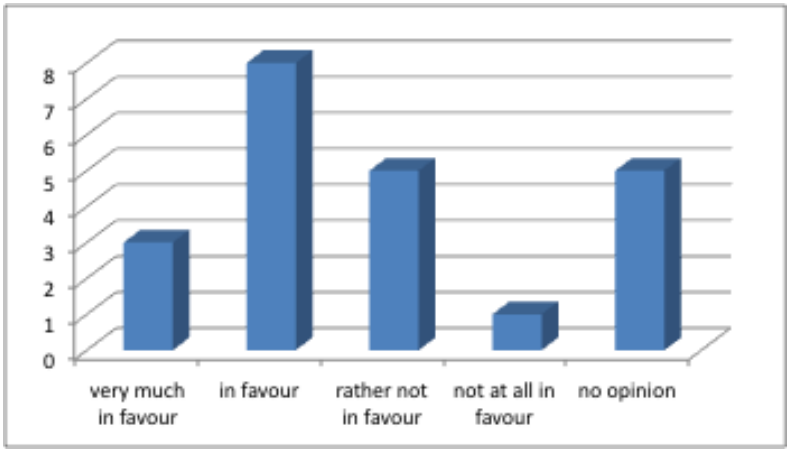
1.6.2 b) In your opinion, how should such information be disclosed?



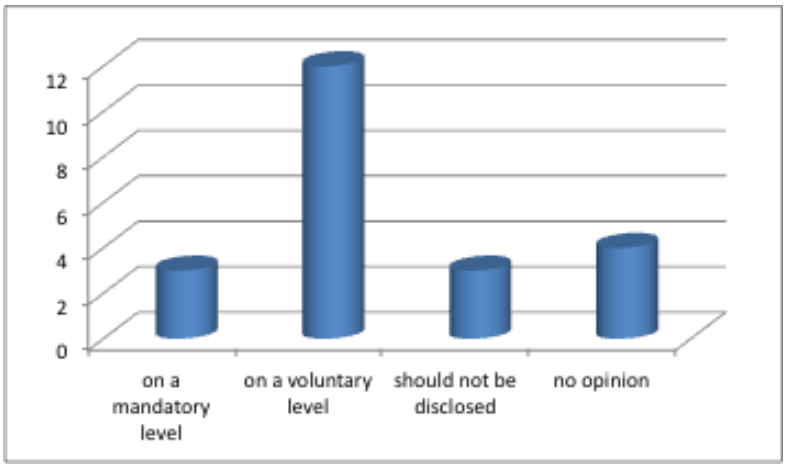
1.6.3 b) Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



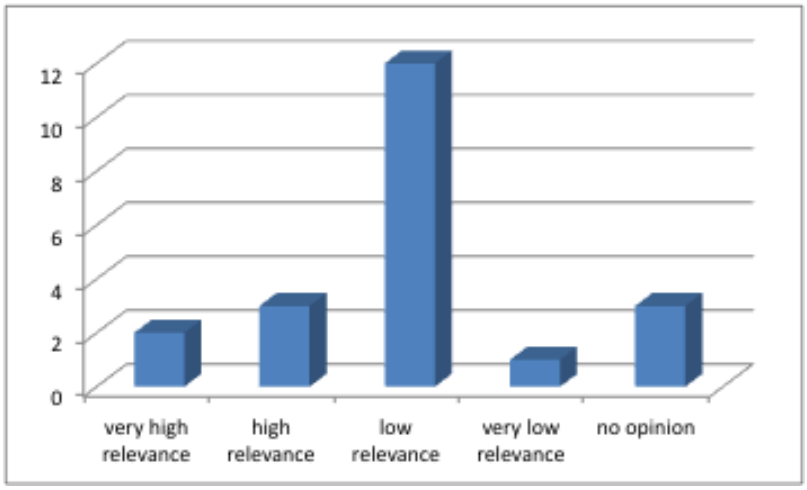
1.6.1 c) What is your opinion regarding the distinction of tracking instruments in disclosure statement with respect to indication of own production?



1.6.2 c) In your opinion, how should such information be disclosed?



1.6.3 c) Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



1.6.4 Please state any reasoning and additional comments, notably which benefits or short-falls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- With regard to Q.1.6.1a - Q.1.6.3a We support the use of Guarantees of Origin as the only tracking certificate to disclosure information on a European level.
- Q1.6.1.a. We are not at all in favour that the tracking system should be linked to the physical link, but we are of course very much in favour that there should be a reliable tracking system for GOs Q.1.6.2.b. With a pie chart
- Electricity as such is not different when fuelled by renewable energy sources of fossil/nuclear sources, so by all means a 'book and claim' system is the only solution in order to give consumers a choice. This is now formally regulated in the EU for RES and should be formally regulated for other energy sources. No other tracking mechanisms should be allowed! Linking the GO to physical flows is fundamentally impossible and should not be encouraged. linking the GO to physical flows will lead to creative solutions of market players: solutions that makes things complicated and less reliable for consumers. The ownership of the production plant does not matter: in case consumers are interested, the market parties will pick this up and will bring special electricity products with information of ownership of production plant.
- Prerequisite of such a system is a comprehensive data basis according to GO registries.
- The examples of CH (SWE?) and AUT shows that "complete" disclosure can work

- There are significant differences between linked and delinked GoO or even GoO with indication of own production which may influence consumer choices. Delinked GoO can easily be used for "greenwashing" fossil or nuclear energy which may be against the interest of consumers who actually want to buy green energy - they would be "cheated". An indication of own production would allow the consumer even to support specific producers (e.g. decentralized small- to mid-size producers) and (their) specific technology (mix). Such differences could influence the prices consumers are willing to pay for the energy and would allow e.g. particularly environment-friendly production to generate more income than others, thus rewarding them for their extra efforts. However, if not on a mandatory level then there would still be gaps in the disclosure which would detriment the possibility for consumers to really make informed choices.

Comments from NGOs:

- We think Go system should be generalized for all electricity sources. If is not, it is ok to track contracts - it can be equally effective - but to try to show this information to the consumer is overload. Consumers do not understand or want to understand accounting nuances. So we are against this proposal. We also do not understand or agree with the issue of bundled vs. de-bundled electricity and GO's. If one assumes that there are two flows - one physical one other of information - than this is less relevant. For any electricity sale, there should be a GO of some source, or an average GO calculated according to residual mix methodology (while GO does not cover all sources). If it is bundled that is OK, if it is unbundled, then either the GO's need to come later, or they were already there, or residual mix is used - but that should be considered equal status to bundled GO with electricity. Own production we think is irrelevant. Assuming there is separation of production and marketing/sales of electricity, then a retailer of electricity might not have any production and sell 100% clean electricity - even if its consumers are consuming at times where no renewables are delivering into the grid. Only with great difficult can you know form where the electricity you are consuming comes from - thus they need to rely on the GO system to track it. If the GO says the production is made by same company that distribute - great. However, we think that is equally good then a company that sells 100% electricity produced by others.
- Taking the complex challenges of transition of our electricity systems towards a renewable system into account, the overall activities of a supplier become more relevant also from a consumer's point of view, and therefore there might be a focus particularly on own production. However, this would be particularly relevant for less attractive production like nuclear and fossil. As long as this can be sold towards power exchanges, and RES can be bought in return, it will have only limited effect in practice.
- We like to 'brainstorm' about the ideas presented here. But they don't fit to the current needs/situation. We have a voluntary market based on GOs. And we have a support system that needs to be reviewed. The first challenge is to check how the two systems can become more compatible, and coherent. Disclosure cannot remediate the problems that are created by an incoherent policy.

Comments from public organisations:

- 1.6.1b We are unsure of the question. We find it most important that there are GOs for the contract showing the origin. We do not want the company to be able to not use GOs to disclose a product specific contract, ex. solar, wind, water. 1.6.1.c We are unsure of this question as well. Suppliers with own production shall have GOs to prove product specific contracts. In our country most electricity contracts are sold through NordPool. Very little is sold outside of NordPool.
- When GO are linked to electricity contracts, it should also be differentiated if this is along the whole chain from production to consumption or only along the last delivery step to the end consumer.
- RES energy from purchased GOs should be differentiated from RES energy from Residual Mix. We do not see a need for GOs to be linked to energy contracts in disclosure. Besides, except from hydroelectric energy, the rest of RES energy is rarely freely contracted in the energy market, but is usually under a support scheme (Feed in tariff).
- it is interesting, though hard to automate the process of reporting and inspecting the electricity suppliers in their fuel mix reporting. Some suppliers have own production in the hands of a sis-

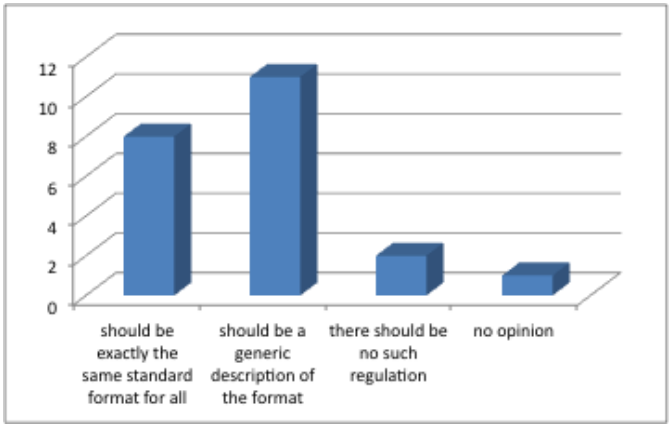
ter/daughter company, so it is labour intensive to investigate all the links. Also, it is hard to inspect whether the 'own production' has not yet been sold to other parties.

- I do not fully understand this section of the slides. However, on a voluntary level we would be in favour of disclosure information outlining the generation attributes that are de-linked from the electricity generation. In our country, the GO is the only tracking system and therefore it is possible to provide information on GOs that are de-linked from the actual electricity generation. The remaining generation is disclosed based on supplier submissions of their contracted electricity generation

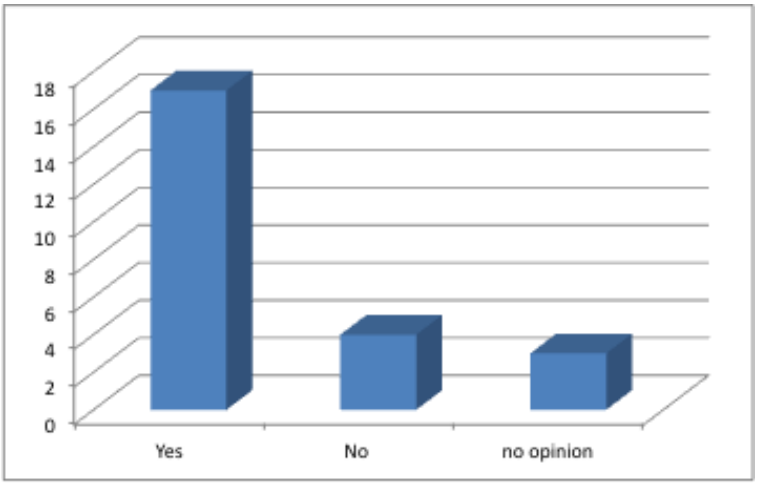
2 Specific fields of interest for recommendations on disclosure relating to presentation of information

2.1 Standard format for electricity disclosure

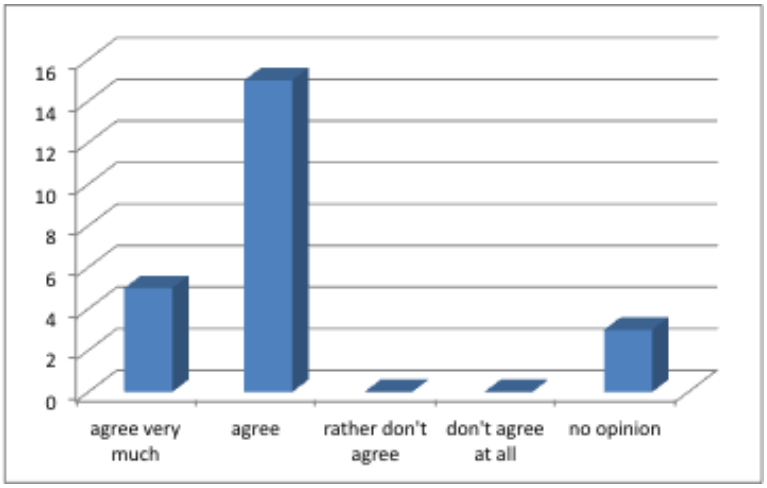
2.1.1 What is your position regarding the regulation of the format of the disclosure statement?



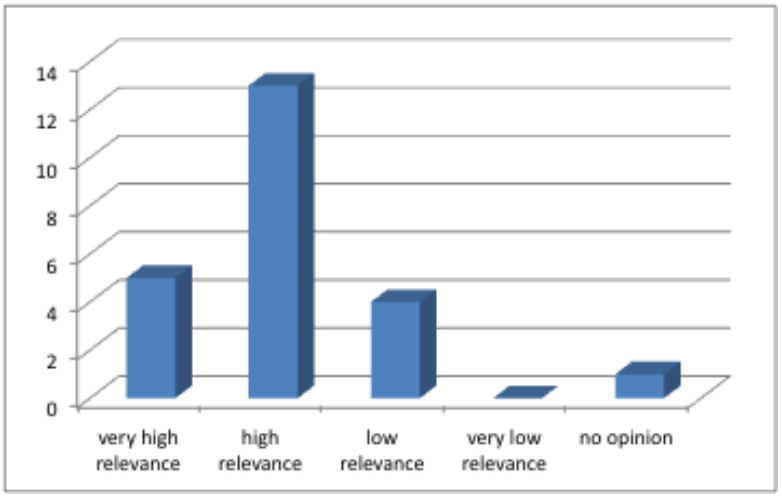
2.1.2 Should there be room for "voluntary extra information"?



2.1.3 Do you agree to the following proposal : display of main information parameters should be in graphical form and more detailed information could be in table or text format.



2.1.4 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



2.1.5 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- As the choice of the customers is limited to national energy suppliers, the format of the disclosure system referred to in Q2.1.1. should be left to the Member States and not be harmonised on a European level. Moreover, we welcome that clear information are provided to the customers. Using different "voluntary extra information" on electricity disclosure makes the comparison between energy suppliers more difficult because not all energy suppliers might publish the same information.
- Here again the consumer interests is point of departure. It is clear that consumers must be able to compare electricity products from different suppliers and that a standard format is very helpful in that. The format however might differ per country. We can imagine that the most basic information is given graphical and that, in case a consumer is interest in also the other aspects, they must be able to find that (depending on the format used in the country). As explained above, additional information from a specific supplying company is always possible, as long as the information given is factual, meaning the be audited by a third party.
- A common standard is useful to compare
- Disclosure (in order to function) shall be done in such a way as to be understood by consumers. Not everyone is an expert and not everyone has the time to read tons of pages of infor-

mation. That is why harmonized and rather graphical presentation of the key facts and figures seems appropriate.

Comments from NGOs:

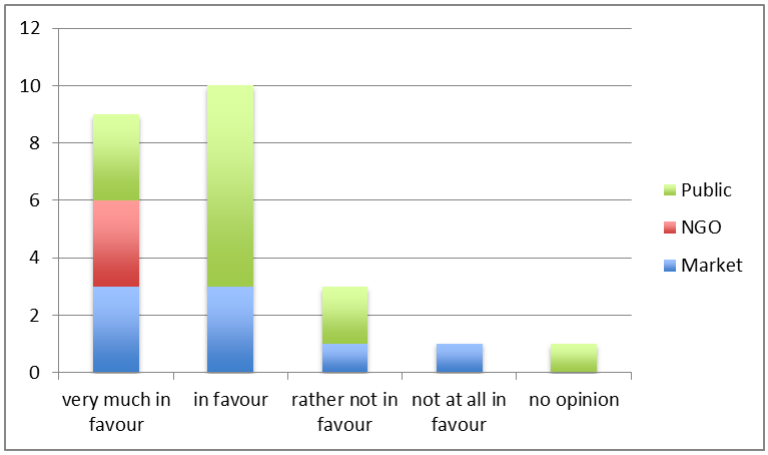
- We think graphical representation of the information is very powerful and easy to understand by consumer. If it is a pie chart or a % bar, is less relevant - that should not be specified at all. It is more important to specify what information needs to be displayed, e.g. country average, company average, specific product (if any). Otherwise the consumer does not know how different its product is. This is relevant information and it can be provided for electricity - so we think it is highly relevant that it is provided.

Comments from public organisations:

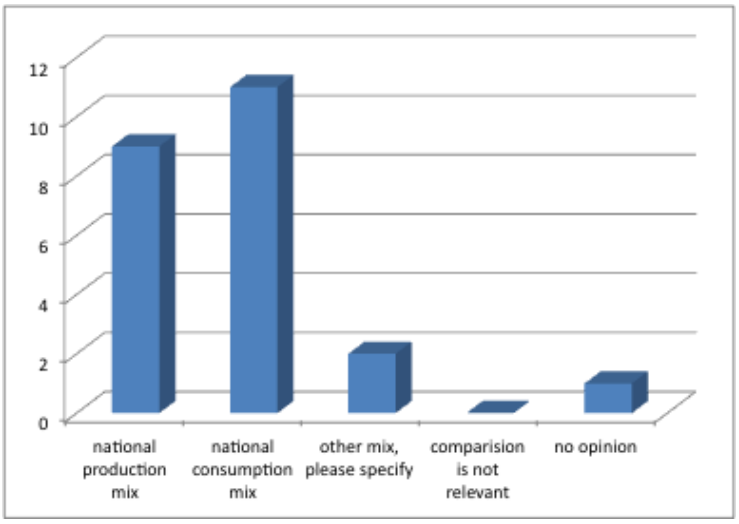
- 2.1.1 There should be a national regulation on the disclosure system. There is no European end user market, there is no need for harmonised disclosure format, it will only drive costs as for now. There might be a need for a harmonised system for GO:s but not for disclosure. High relevance on a national level.
- 2.1.1: Format on homepage should be based on the same standard format for all, while information on bills should be based on minimum requirements with reference to more info on homepage. Voluntary extra information could also be part of the marketing/promotional materials of the product.
- The generic description of the format has to be specific enough to allow comparison between different suppliers.
- In our country, suppliers are required to publish their own fuel mix and CO2 alongside the national figures on all electricity bills for comparison. This is in a tabular form. Additional information such as year on year trends of national fuel mix (graphical), suppliers comparison table for both fuel mix and CO2 is detailed annually in a centrally provided fuel mix and CO2 disclosure information paper.
- Basic categories (FOS, NUC, RES) in respect to sub-categories should also be governed by guidelines. This is because the graphical representation of sub categories can be misleading in relation to basic info.

2.2 Provision of comparison values

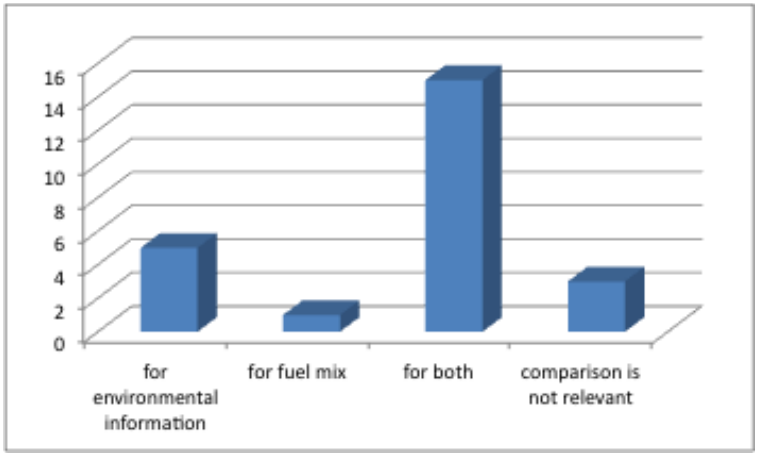
2.2.1 What is your position regarding the provision of comparison values besides product and supplier mix?



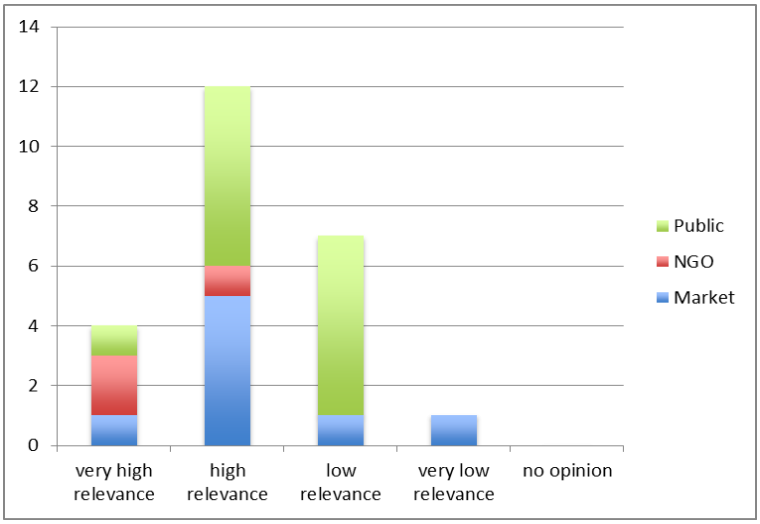
a) Should this be the national production mix or any other mix (e.g. national consumption mix?)



2.2.2 Do you consider this comparison relevant particularly for environmental information, for fuel mix or for both?



2.2.3 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



2.2.4 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- Disclosure is about disclosing the fuel mix, CO2 and nuclear waste, of specific electricity products offered by supplying companies to consumers. Ranking the companies that are offering the electricity products is another thing and should not be mixed with the 'quality' of the products (we see in some countries that this is happening: other aspects are than important, like for example the investment programs in fossil, nuclear or renewables, etc.).
- Level of detail in Luxembourg seems to be too high.
- In our country a standard.
- Comparisons may help consumers make their choices, as (and if) they are (normally) rather easy to understand. However, to avoid consumer fraud this should be regulated carefully and done on a harmonized basis using specified data..

Comments from NGOs:

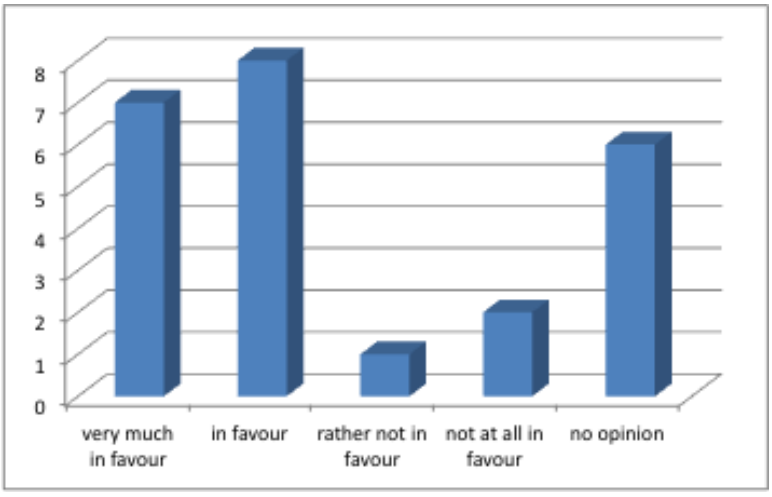
- We think that production mix is relevant, but that as a minimum, information on CO2e & nuclear waste should be displayed for: the product, the full set of products of the supplier and the production of the country. These figures, would indicate to the consumer, form where its energy is coming. They can be displayed also in graphical form based on fuel mix, but we find that providing the numbers could be of greater interest.
- Figures (particularly on environmental aspects) are probably not very meaningful to consumers until they can be compared to a reference. National production mix seems to be appropriate here.

Comments from public organisations:

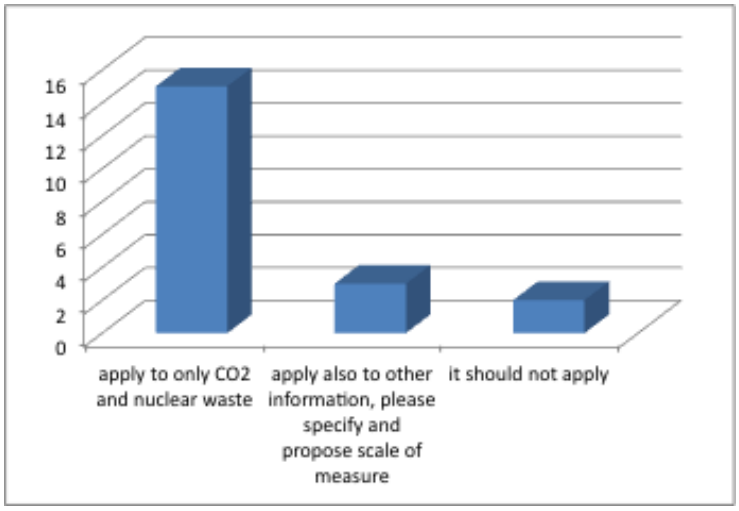
- 2.2.1 In our country the disclosure is of Nordic production mix and supplier mix. There is a value for the customer - consumer to have information about the individual contract - the product mix. We interpret 2.2.1 that we are asked if there is a need for the individual product mix as well as the supplier mix.
- All electricity suppliers should be mandated to disclose the fuel mix against the national fuel mix on all electricity bills at the very minimum so that customer can compare their suppliers fuel mix in a meaningful way. Further, we agree that individual product mixes should be a 'second level' of information (e.g. disclosed on the suppliers website). Note that this is recommended in the recent CEER consultation 'Advice on Green Electricity'.

2.3 Evaluative presentation

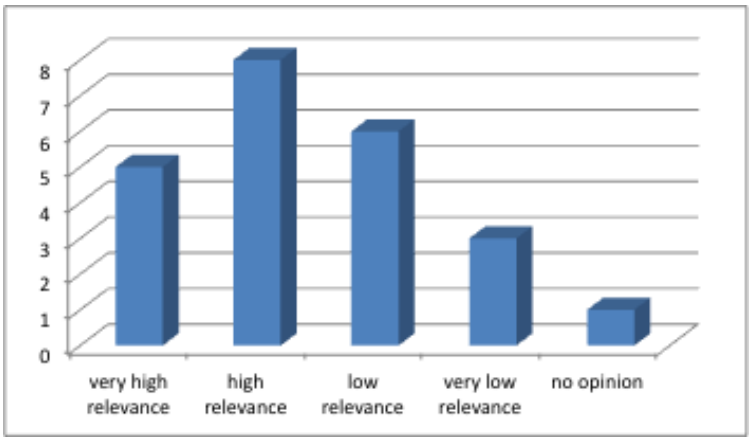
2.3.1 What is your position regarding evaluative presentation?



a) Should such presentation apply to only CO2 and nuclear waste, or also to any other information (please specify, and propose scale for measure)



2.3.2 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



2.3.3 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- In case the use of the GO-system is mandatory for specific electricity products, the government has the obligation to audit the proper use of the GO (the mandatory use of the GO system should be one of the main recommendations from RE-DISS). The product description must, in principle, be based on information available on the GO (is always factual and correct). In case other information is provided by the supplying company, this information must be also factual, meaning auditable (and the supplying company must organize this third party audit). If so, no evaluative presentation is needed, consumers must be able to trust information provided by supplying companies and proper regulation must be in place so that the government are able to audit the supplying companies.
- The question is who defines the categories A-G (Spain). Luxembourg seems to be better, as no evaluation is made.
- Additional information to be included could be the negative externalities of certain power plants as they are assessed in the Environmental Impact Assessment. However, it is questionable whether this is practical - as this would include a lot of information and would not easily be presentable.

Comments from NGOs:

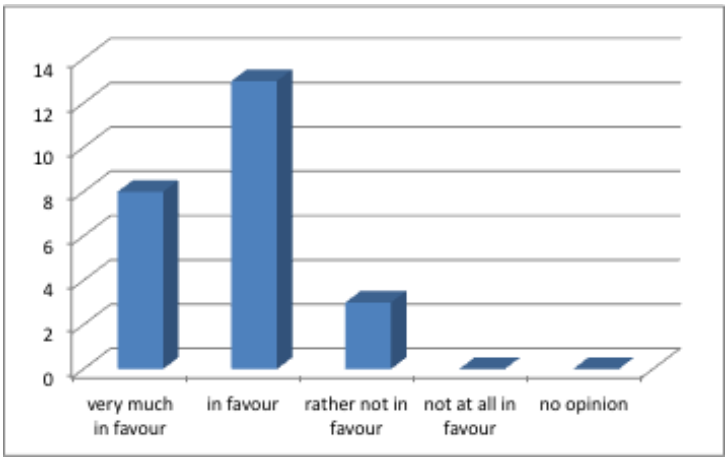
- This is one of the easiest way for consumer to understand what he is purchasing. Also, it aligns well with other ways of presenting information for other purposes (energy efficiency of electric appliances, houses, tyres, etc).

Comments from public organisations:

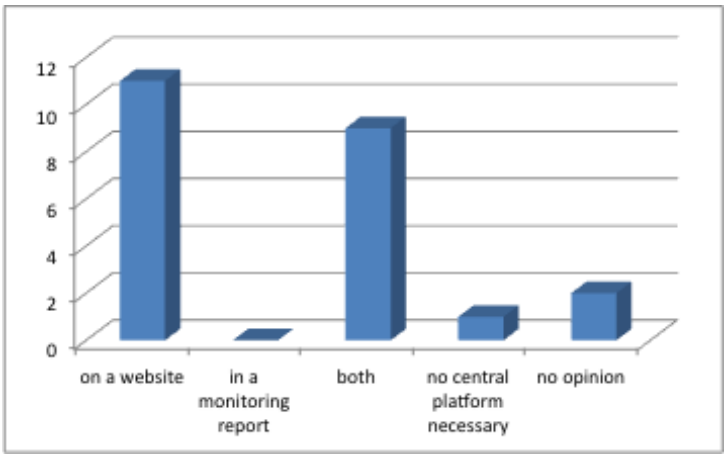
- National regulation, not on a European harmonisation level. It is not wrong to have more information but on a voluntary basis. This should be a competition issue between the suppliers.
- This is an interesting topic when comparing supplier mix. However in our country supplier mix is not relevant and consequently this aspect is not relevant
- It is up to the market / consumers organizations to organize these kinds of evaluations. Governmental organizations should provide neutral transparent information/reports.
- While the evaluative process is beneficial for customers when comparing supplier's environmental impact, it should be left the discretion of each Member State to implement such measures.

2.4 Presentation of information on a national platform

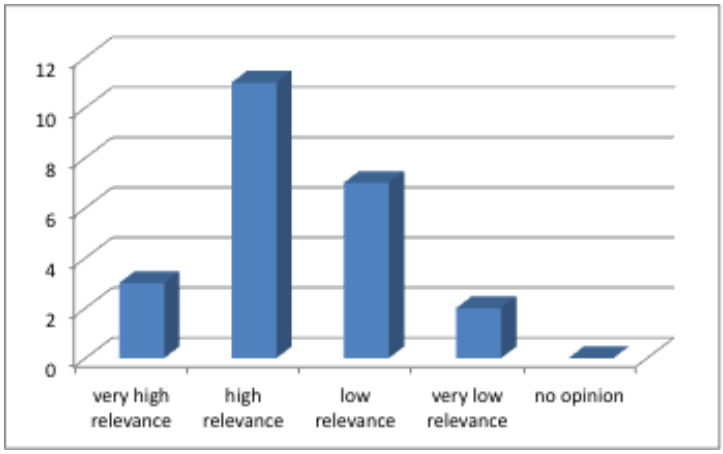
2.4.1 What is your position regarding such central provision of disclosure information on a national platform?



a) Would you prefer central provision of information on a website or in a public monitoring report?



2.4.2 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



2.4.3 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- Price comparison tools (PCT) can be taken as an instrument to ensure that customers have access to information in order to be able to make a choice on the energy product. Hence, the tool should contain information on electricity from renewable as well as fossil sources for instance, on the price and the source of the energy. We support the set-up of common rules and standards of the methodologies used by the providers of the various PCT. This guarantees that the level of information provided by the PCT are all the same and that the choice of the customer is based on solid and comparable information.
- As mentioned before: market parties should be bound to market rules (using the GO and the information available on the GO) with the result that electricity products offered in the market are reliable and trustworthy. The electricity market is not different than other markets, except maybe for the fact that more extensive rules are needed to proof the origin of the products and that thus the use of a 'book and claim' system must be mandatory. in other markets sites comparing products are very often the initiative of market parties.
- Websites are easily accessible, but reports may be preferred by some consumers. Both options together may be rather expensive.

Comments from NGOs:

- If this information is not available it can be hard for the consumer to find alternative suppliers and fully understand how better they might be. A central place where to find this information, in a credible and comparable way is thus an important tool for the transparency of the different offers in the market. The site could disclose the average of companies + any specific products.
- For the time being, disclosure information is only of limited significance for the actual environmental value of an electricity product, until additionality aspects are taken more into account. Therefore such central provision of information is considered a contribution towards transparency, but only considered being of "low relevance".
- Supplier disclosure has be communicated at 'general public level'. The bill should be as much as possible be reserved for individual information, and individual suggestions (E.g. with regard to energy saving, but why not, also about other products of the same supplier having a lower carbon intensity).

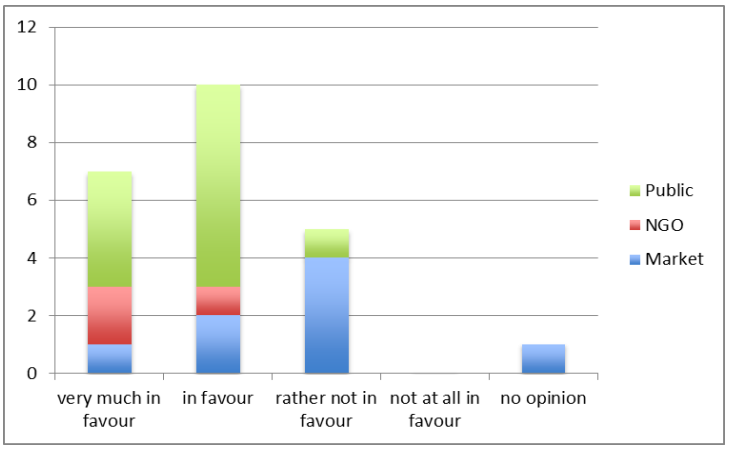
Comments from public organisations:

- It should be the responsible authority that publishes information on a yearly basis.
- It is important that this information is provided centrally and by a competent authority to ensure the veracity of supplier fuel mix and emission disclosure for electricity customers.

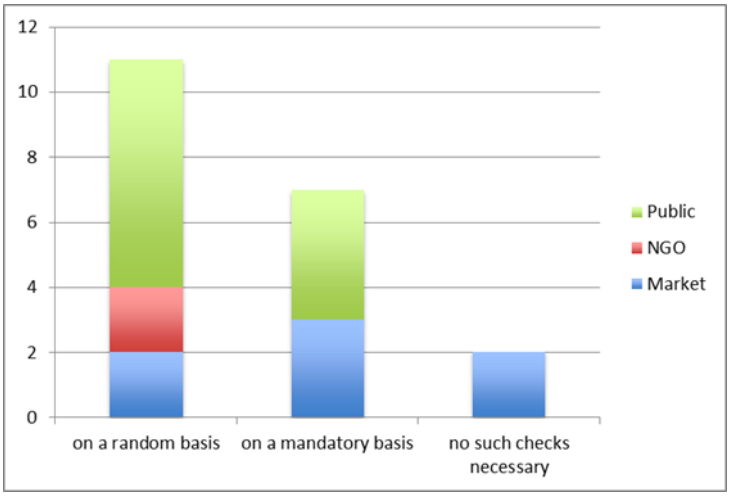
3 Specific fields of interest for recommendations on disclosure relating to further aspects

3.1 Regulatory oversight and verification

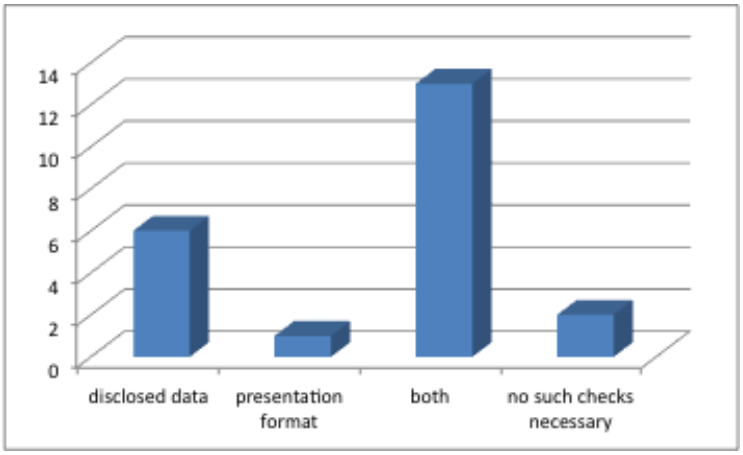
3.1.1 What is your position regarding the competent body performing checks and audits with respect to actual disclosure by suppliers?



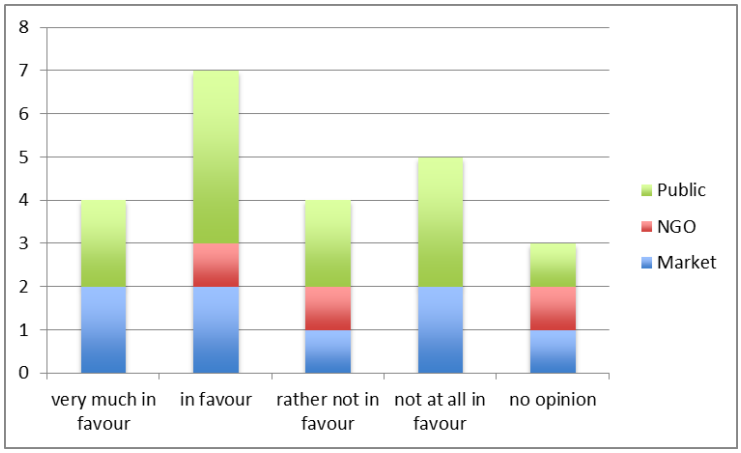
a) Should such checks take place on random or mandatory basis?



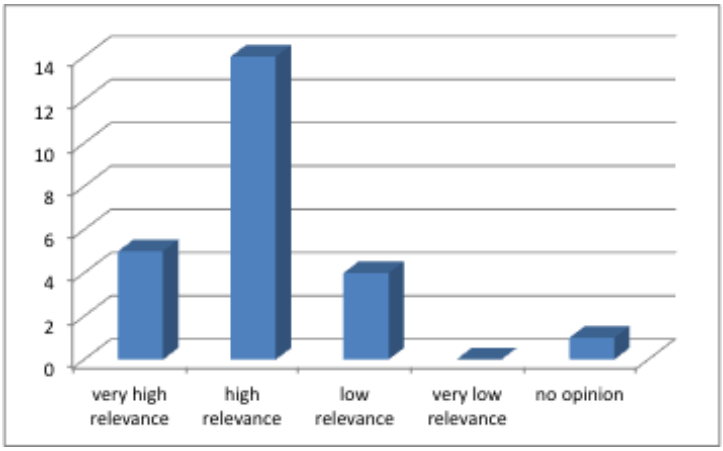
b) Should such checks include only a check of disclosed data or of presentation format or both?



3.1.2 What is your position regarding the competent body taking over the responsibility of calculating the disclosure information (based on documentation by suppliers, cancelled GOs, etc.) rather than the supplier himself?



3.1.3 Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?



3.1.4 Please state any reasoning and additional comments, notably which benefits or shortfalls of the respective approaches do you consider decisive for your assessment.

Comments from market participants:

- The data, the calculation and the actual outcome of the fuel mix of our company has been checked on a yearly basis by external independent accountants. Hence, the fuel mix is only certified when complying with independently set criteria. A competent body calculating the fuel mix for each energy supply would predominately result in extra cost and require extra time rather than being beneficial for customers.
- It should be third party verification.
- In general we believe that starting with a consumer choice, the suppliers offering electricity products must be bound to market rules, enabling the governments (or their authorized governmental bodies) to make proper audits, ensuring the quality of the electricity products offered on the market (just like any other market). In that view we have not a specific opinion whether the audits are done by a competent body, as long this is done under the responsibility of governments, because it is part of legislation in place in that specific country.
- With a common database including all energy sources a calculation would not be necessary, as this registry could automatically calculate the information needed for disclosure.
- This makes the disclosure even more reliable
- The competent body may be able to provide an additional guarantee for the correctness of the disclosure which is crucial for disclosure to be of any value after all. Checks should be mandatory but on a random basis, i.e. without informing the audited producer in advance..

Comments from NGOs:

- This is a hard one. In practice different systems can co-exist and work well, depending of the country where they are set. The fundamental thing is that the competent body should have a right to do checks and audits and should, at least with a given frequency, actually do them. Heavy penalties for misconduct should be in place, so that is discourage. In principle mandatory checks should not be necessary every year, provided random checks in place and there are good relationships between competent body and industry. But this can differ significantly from country to country. In any case, the competent body should check that what all companies disclose matches with their overall figures. Significant differences should be explained and corrected.
- This probably is strongly depending on the number of suppliers in a market. In the case of a large number of suppliers, central calculation by a competent body seems to be a non-appropriate burden. Application of random checks might be good in order to avoid at least those cases of "misbehaviour" by market participants which are done on purpose.

Comments from public organisations:

- There should be a national competent body responsible for supervising the disclosure system. How this is done is up to the national competent body and its instructions. It is the responsibility of the supplier to calculate the disclosure system.
- Q3.1.2 In our country the competent provides an excel sheet with standard figures e.g. needed to calculate disclosure information by the supplier.
- the competent body can provide a template in e.g.. Excel that provides calculation formulas and has to be filled in by the supplier. This way workload of competent body is not too high and calculation method is standardised.
- In our country, the competent authority calculates the fuel mix and this is published by the NRA. The NRA also approves updated fuel mix disclosure information on supplier electricity bills each year prior to issue to final customers. This, similar to previous section, is important to ensure veracity of fuel mix claims made by electricity suppliers.

4 Any further comment you would like to make and which has not been covered by the questions above

- Overall, we welcome disclosing relevant information on the energy supplied to its customers and is highly in favour of customers' empowerment. However, when discussing the disclosure of information on the supply and production mix it is necessary to take a balanced approach between the level of transparency and the amount of information that is understandable to customers. Providing too much information to customers can also have a controversial effect and turn out to be too complex for energy consumers to understand.
- We follow some basic principles, giving answers to almost all questions asked in this questionnaire. (1).The consumer choice is leading (sometimes formulated by NGO's and consumer organisations): this leads to a minimum list of 'facts' the consumer must be informed about (mandatory). (2). since electricity is always electricity the use of a 'book and claim' system is the only way to give the consumer that choice (if so, please work with one standardized book and claim system: in Europe that is for certain the GO). Make the use of the GO system mandatory, giving the governments the basis to make audits or order audits on their behalf). (3) only factual information can be put on the GO, can be given to a consumer and only that kind of information is auditable. In case the supplier has additional information about the product, this information must be tractable and auditable, by a third party (making this audits mandatory is a possibility). Make sure that RE-DISS distinguishes between disclosing information concerning electricity products and supplying companies and don't mix this up.
- Overall a disclosure system should be of relevance to the end consumer - end customer and should not be cost driving unless it is absolutely necessary and in proportion to the gain of such measures.
- Uniformisation in EU is very important but too much information and too much "technical details" is not "productive" and it can introduce the users/customers (they are not experts !) in mistakes, errors and incomprehension.
- In general, the disclosure information must be clear and understandable and visually attractive for the consumer. It is best when there is a national harmonisation of the disclosure, such that all suppliers in a country disclose the same information and details.
- One issue which is often raised and has not been addressed by this questionnaire is that of simultaneous production and consumption requirements. Should GO in the long run still be averaged out over a whole year? Would balancing on a monthly (or hourly or 15-min) basis increase credibility?
- We think the bill is not the best place for detailed information about the supplier. We think supplier related information belongs to all general publication of the supplier (website, customers' magazine...). Regulators could also play a more active role in disseminating such information. // We also think that some of the topics this RE-DISS questionnaire tries to cover, should be discussed in other forums. Disclosure is only a tool. But it is difficult to develop the perfect tool if the legal and economic context are unclear. In this case a lot depends on how the support policy is going to develop. And what links will be made with the voluntary market. // From consumers perspective, we have to focus on simple and easy to understand information, without overload. The information has to be selected 1) on consumer preferences and (cumulatively) 2) on what is relevant for the energy and climate policy.

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