

# How does RE-DISS support the implementation of reliable disclosure systems?

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RE-DISS II Final Webinar

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[www.reliable-disclosure.org](http://www.reliable-disclosure.org)



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# Overview

## What did RE-DISS II provide?

**Communication platform**

**Background and analysis**

**Monitoring and data provision, e.g.**

- Country profiles
- Annual residual mix data
- Environmental indicators

**Recommendations and guidelines**

- RE-DISS Best Practice Recommendations
- Starter Kit for Basic Implementers (BI)
- Proposal for recognition criteria
- Guidelines for the regulation of front side disclosure
- Disclosure guidelines for suppliers

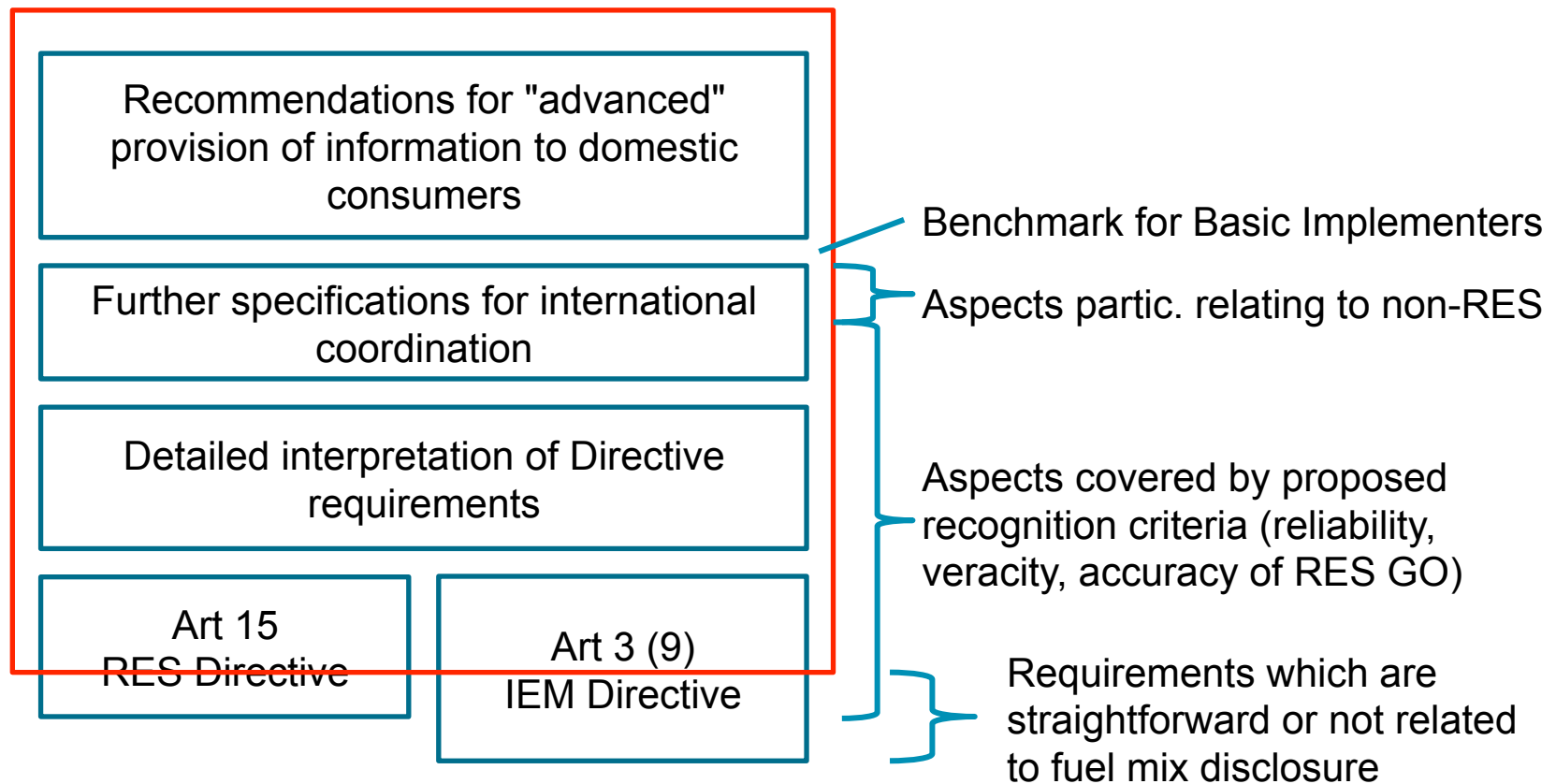
## Overview

### **General remarks on principles for all RE-DISS recommendations and guidelines**

- Full responsibility for all published documents lies with the RE-DISS II project team
- Based on comprehensive stakeholder discussions and consultation
- Ambition to receive an informal approval by competent bodies (and other stakeholders)
- Intended purpose:
  - Serve as point of orientation for individual countries
  - Support a reliable and sensible implementation of GO and disclosure frameworks across Europe
  - No binding character

## What are the RE-DISS Best Practice Recommendations?

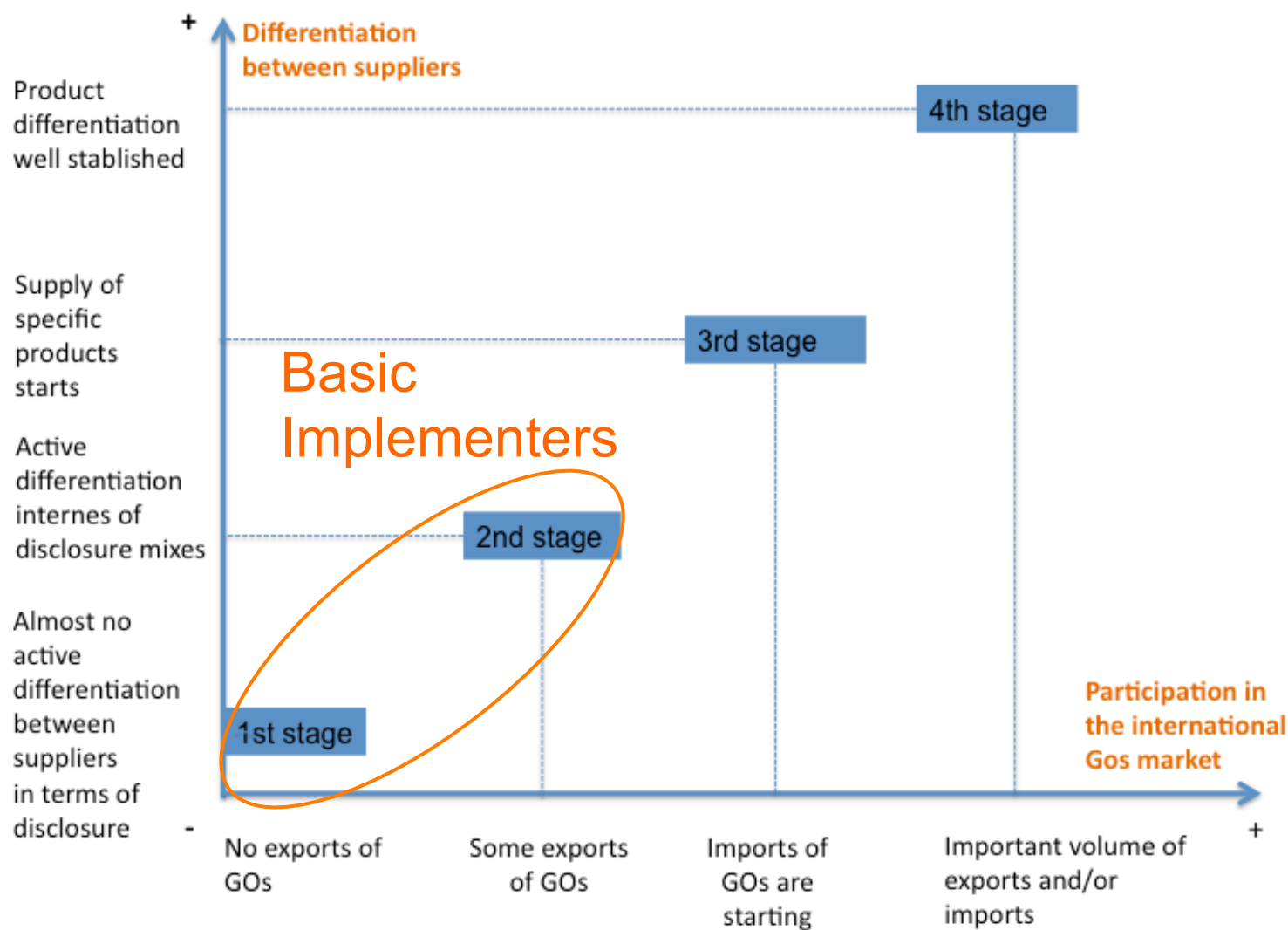
### Scope of Best Practice Recommendations



## Starter Kit for Basic Implementers

- Based on RE-DISS BPR
- Should allow Basic Implementers to focus first on the most relevant BPR in order to
  - ensure consistency of international tracking system;
  - spur the development of a differentiated market on the national level.
- Step-wise implementation should not imply dead-end developments, but should include logical elements when further advancing to more advanced levels.
- Allows to keep the pace with liberalisation of national markets and development of specific consumer interest.
- Stepwise approach takes into account restrictions by limited financial and administrative capacities of responsible bodies.

## BPR and basic requirements



# Recognition Criteria

## Proposal for Recognition Criteria

- Background:
  - Reasons for non-recognition of GOs according to Article 15 (9) of the RES Directive are very vague and therefore difficult to verify in an objective way
  - These need to be interpreted on a more detailed level
  - CA-RES has agreed on six different criteria, which still give room for substantial interpretation
- The RE-DISS approach:
  - Six criteria as agreed by CA RES are taken as baseline
  - RE-DISS criteria propose how to interpret those on a more detailed level by means of specific and verifiable aspects (which are covered by the RE-DISS BPR)
  - Application of these criteria helps Competent Bodies to assess imported GOs in a thorough but pragmatic way

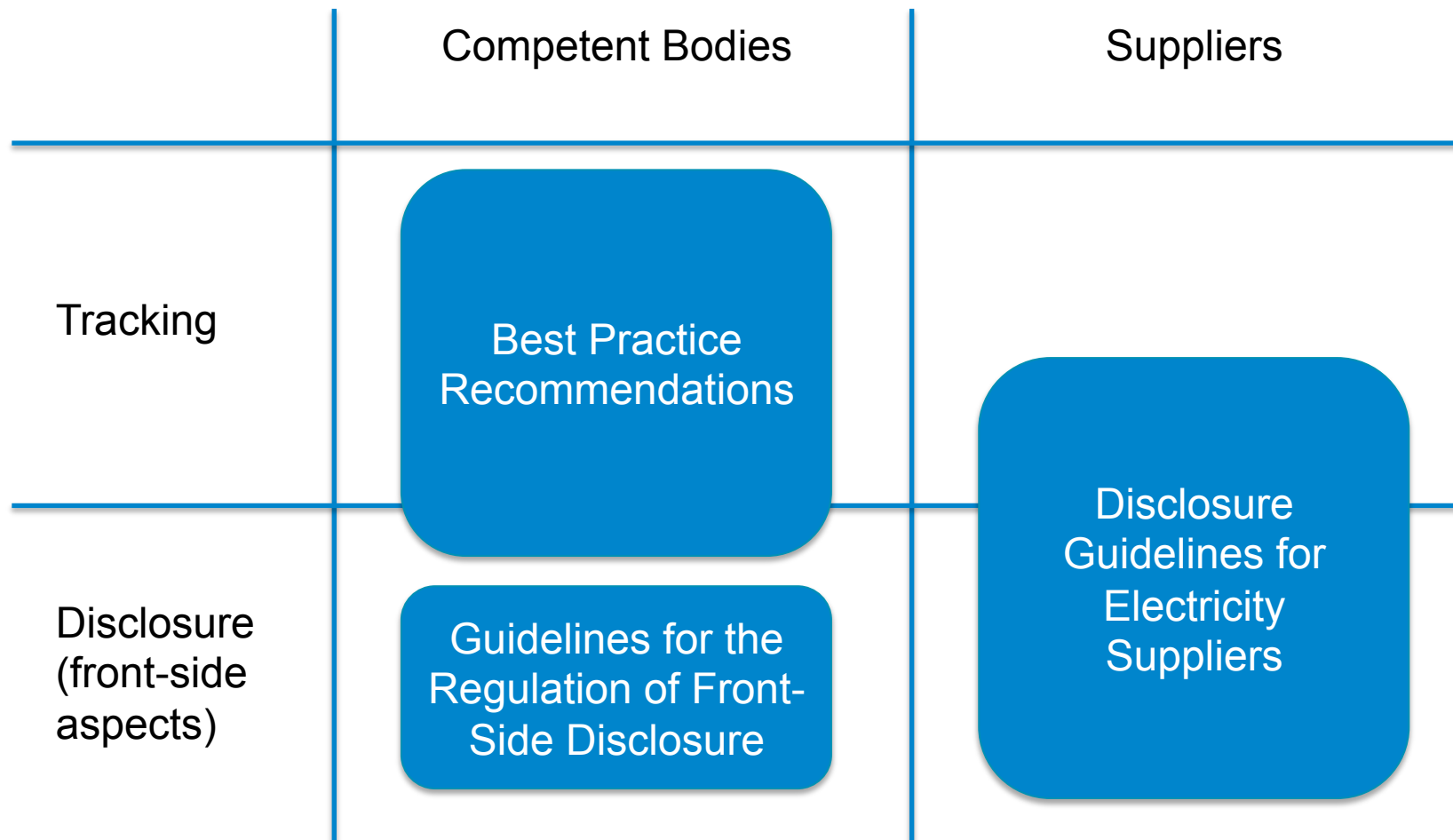
# Recognition Criteria

## Example: Criterion No. 3

<b>3</b>	<p><b>The issuing member state ensures that: 1) no more than one GO is issued in respect of each unit of energy produced and 2) the same unit of energy from renewable sources is taken into account only once (Art. 15 (2) 2009/28/EC);</b></p> <p>This can be considered fulfilled based on compliance with the following criteria:</p>		<b>Compliance supported by BPR Nr.</b>
<b>3.1</b>		<b>No more than one GO is issued in respect of each unit of energy produced</b> by fulfilling one of the following criteria	
3.1.1		There should be no issuing of more than one GO for the same unit of electricity.	14a
3.1.2		This also applies to cogeneration plants which are using RES as the energy source: only one GO should be issued per unit of electricity.	15a
<b>3.2</b>		<b>GO to be used only once</b> , also including the following criteria	<b>13 (1)</b>
3.2.1		GO is cancelled when being used.	13 (2)
3.2.2		GO can't be used or transferred after expiry, cancellation, export.	13 (3), 13 (4)
3.2.3		Exported GO are practically removed from the exporting registry.	13 (5)
3.2.4		Processes in the registry exclude duplication of GOs.	13 (6)
3.2.5		If suppliers disclose the specific product mix for some of their consumers should be required to give product-related disclosure information, including environmental impacts, to all customers, including default products.	39b



## The Framework for RE-DISS Disclosure Guidelines



# Disclosure Guidelines

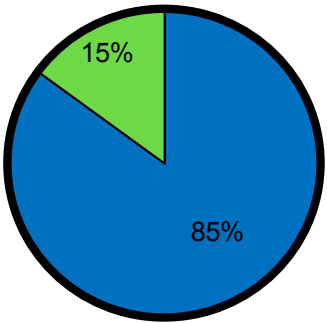
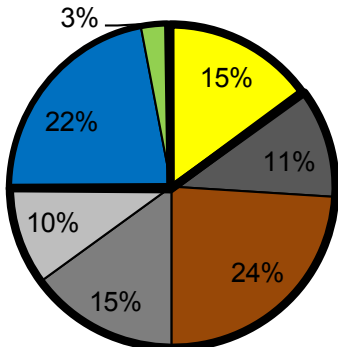
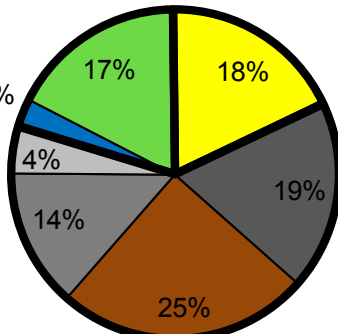






## Guidelines for the regulation of front-side disclosure

- Support for Competent Bodies to regulate “front-side aspects”
  - which sort of information is disclosed? → *parameters*
  - how is this done? → *format and layout*
- Relevant for implementation on national level
  - Ensure comparability for end-consumers (which are active only on the national market)
  - less relevant for international coordination
- Requirements as defined by Article 3 (9) of IEM Directive act as an obligatory baseline for all recommendations
- National framework conditions will often determine which information is relevant and of interest to consumers.
  - With respect to the parameters to be disclosed: tool box
  - Weighting between provision of useful information and information overload.

## Disclosure Guidelines for Suppliers

- Support for electricity supply companies in order to
  - apply the given national regulatory framework
  - optimise their own information towards their end-consumers under these preconditions
- Disclosure Guidelines for Suppliers are more comprehensive
  - “back-side aspects” of disclosure (tracking); *and*
  - “front-side aspects” (which sort of information is disclosed, and how this is done)
- Development of system principles and particularly technical infrastructure is beyond the powers of individual supply companies (and therefore NOT included in these guidelines)
- Relevant requirements as defined by IEM Directive and by RES Directive of course act as an obligatory baseline

# Disclosure Guidelines

	Your Product "Green"	Average of your "Sample Supplier"	For comparison: [National] production mix
<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: yellow; border: 1px solid black; margin-right: 5px;"></span> Nuclear</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: gray; border: 1px solid black; margin-right: 5px;"></span> Hard Coal</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: brown; border: 1px solid black; margin-right: 5px;"></span> Lignite</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: lightgray; border: 1px solid black; margin-right: 5px;"></span> Natural gas</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: lightgray; border: 1px solid black; margin-right: 5px;"></span> Other fossil</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: blue; border: 1px solid black; margin-right: 5px;"></span> Hydro power</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: green; border: 1px solid black; margin-right: 5px;"></span> Other renewable</li> </ul>			
High-efficient cogeneration of electricity and heat	5,0%	7,0%	8,5%
CO <sub>2</sub> emissions	 0 g/kWh	 494 g/kWh	 529 g/kWh
Radioactive waste	 0 µg/kWh	 450 µg/kWh	 537 µg/kWh
<i>The mark (♦) indicates the level of emissions of CO<sub>2</sub> and radioactive waste related to the fuel mix of your product and of the average fuel mix of your supplier compared to national average.</i>			
Additional information with respect to your product <b>"Green"</b>	100% of this electricity production has been documented based on Guarantees of Origin.		
	85% of these Guarantees of Origin represent electricity production in [Country A].		
	15% of these Guarantees of Origin represent electricity production in [Country B].		
	0% of this electricity production has received public support.		

Source: RE-DISS II

## Summary

### **Your benefits from following RE-DISS recommendations when implementing your national system**

- Be sure to fulfill legal requirements imposed by Directives.
- Apply long-discussed and reality-tested solutions.
- Ensure a reliable fuel-mix information of your national electricity consumers.
- Ensure that your market participants have direct access to an existing European market infrastructure.
- Give no reason for non-recognition of GOs by ensuring veracity, accuracy and reliability.

## Contact points

### **RE-DISSII project coordination**

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RE-DISS website

(where all guidelines, recommendations and  
background documents can be downloaded):

[www.reliable-disclosure.org](http://www.reliable-disclosure.org)



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# Overview

## Where have we come from?

E-TRACK

E-TRACK II

RE-DISS

RE-DISS II

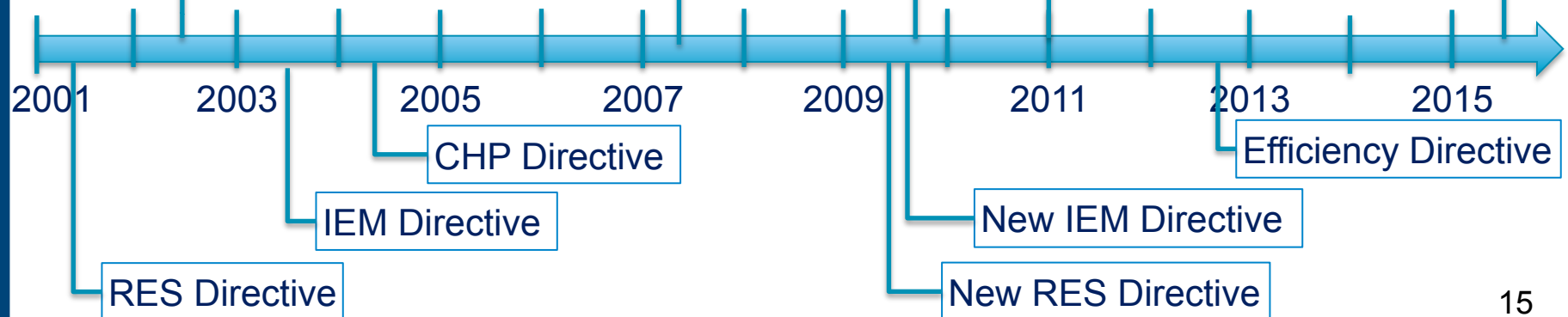
**09/15:** Final background & monitoring documents  
Final recommendation documents  
Handing over of key tasks to AIB

**12/10:** RE-DISS BPR V1.0 and 1<sup>st</sup> RE-DISS Residual Mix

**9/09:** E-TRACK Standard V3.0;  
Best Practice for the Tracking of Electricity  
(E-TRACK II Final Report)

**3/07:** E-TRACK Standard V1.0

Foundation of AIB and RECS Int



# Best Practice Recommendations

## Elements of the RE-DISS BPR

**Focus on coordination requirements due to international trade, incl.**

- How to implement the 12 month lifetime rule for GO
- Further recommendations on GO
  - Usage of the European Energy Certificate System
  - GO for different energy sources and technologies
  - GO as the unique “tracking certificate”
  - Recognition of GO imported from other countries
- Disclosure Schemes and other Reliable Tracking Systems
- Calculation procedures for Residual Mixes
- Contract based tracking
- Timing of Disclosure
- Further Recommendations on Disclosure
- Steps for determining the disclosure figures of a supplier
- Annex: Residual Mix Calculation Methodology



## Best Practice Recommendations

### How can you use the RE-DISS BPR when implementing a national system?

- Use BPR in combination with Directives and EECS Rules
  - BPR are on an intermediary level of detail
  - No strict distinction of content possible:
    - BPR highlight some individual aspects of Directives
    - BPR aim to reach all European countries
    - Implementation of BPR should ensure that GOs can be considered reliable, veracious and accurate
      - no reason for non-recognition (cf. Art. 15 (9))
- Consider the different characters of individual BPR:
  - General guidance in order to ensure stringency
  - Proposal of one (ideal?) approach
  - Proposal of different alternative forms of implementations
    - No clear definition as blueprint for lighthouse implementation or as pragmatic hands-on guidance

# Recognition Criteria

## First level criteria (as applied by CA-RES)

1. Implementation of Art. 3 (9) of 2009/72/EC by the Member State
2. The issuing member state has implemented Art. 15 of RES-Directive 2009/28/EC
3. The issuing member state ensures that:
  1. no more than one GO is issued in respect of each unit of energy produced
  2. the same unit of energy from renewable sources is taken into account only once
4. The issuing member state ensures the function of GO
5. The Registry system is electronic, accurate, reliable and fraud resistant
6. Issued GOs include the minimum content (Art. 15 (6) 2009/29/EC)

## Cross check between proposed recognition criteria and requirements as imposed by RES-Directive 2009/28/EC

Requirements based on the RES Directive	Purpose of GO is disclosure, no other (conflicting) purpose	GO refers to 1 MWh of RES-E	No double counting of the production attributes which correspond to a RES-GO	No accounting of GO for national targets according to Art. 3 and no effects on calculation of gross final RES consumption according to Art. 5	Use of GO within 12 months of production	GO is used only once	GO originates from a competent body according to Art. 15	GO are issued, transferred and cancelled electronically	MS or competent bodies supervise issuance, transfer and cancellation of GO and accuracy, reliability and fraud-resistance is assured	GO contains minimum information as defined by Art 15 (6)	No further well-founded doubts about accuracy, reliability or veracity of GO	Transfer of GO to third party has to result in a correction of the supplier's energy mix	Total
reference to RES Directive	15 (1)	15 (2) subpar. 1 sentence 4; 15 (1)	15 (2) subpar. 1 sentence 5; subpar. 2	15 (2) subpar. 4	15 (3) sentence 1	15 (3) sentence 2	15 (4) sentence 2	15 (5)	15 (4) sentence 1; 15 (5)	15 (6)	15 (3) sentence 2	15 (8)	
1	x												1
1.1	x												1
1.1.1	x												1
1.1.2	x												1
1.2			x									x	2
1.2.1			x									x	2
1.2.2			x									x	2
1.3			x										1
1.3.1			x										1
1.3.2			x										1
1.3.3			x										1
2	x	x	x	x	x	x	x	x	x	x	x	x	12
2.1		x											1
2.2					x								1
2.3							x		x				2
3			x			x							2
3.1			x										1
3.1.1			x										1
3.1.2			x										1
3.2						x							1
3.2.1													1
3.2.2													1
3.2.3													1
3.2.4													1
3.3													1
4													2
4.1													2
5								x	x				1
5.1								x					1
5.2									x				1
5.2.1									x				1
5.2.2									x				1
5.2.3									x				1
5.2.4									x				1
5.2.5									x				1
5.2.6									x				1
5.2.7									x				1
5.2.8									x				1
5.2.9									x				1
6										x			1
6.1										x			1
6.2										x			1
6.3										x			1
6.4										x			1
6.5										x			1
6.6										x			1
6.7										x			1
6.8										x			1
6.9										x			1
6.10										x			1
Total	1	2	12	3	2	8	2	3	13	12	1	4	1

➔ The proposed criteria assure that all (relevant) aspects of Article 15 are thoroughly implemented in the issuing/exporting domain

# Disclosure Guidelines

## Covered aspects

### **Additional parameters**

- Shares of supported (RES) electricity
- Country of origin
- Detailed fuels / technologies
- Further environmental indicators
- Additionality aspects
- Distinction of tracking mechanisms

### **Presentation of information**

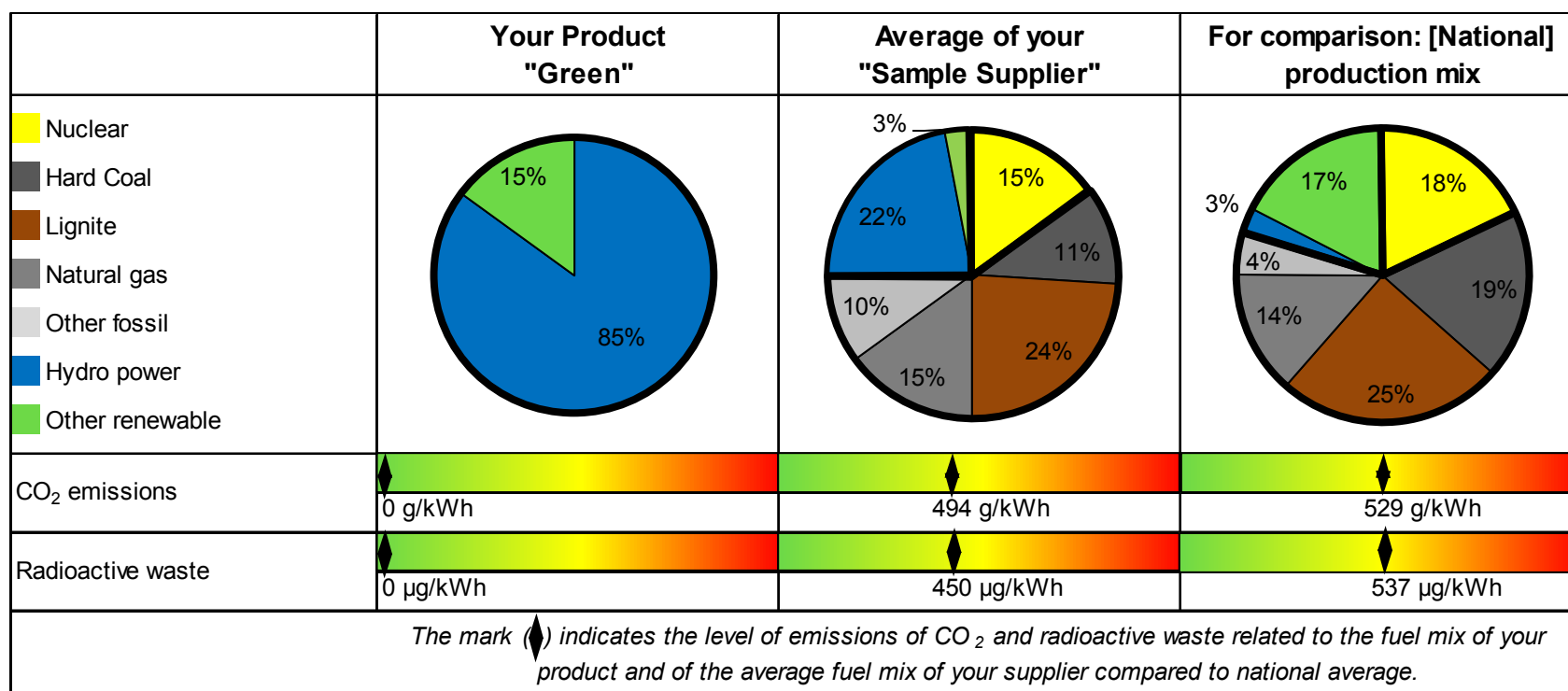
- Standard format for disclosure
- Provision of comparison values
- Evaluative presentation
- Multi-tiered information
- Central information platform

### **Further aspects**

- Regulatory oversight and verification
- plus: reference period and frequency

# Disclosure Guidelines

## Example display of basic parameters



Source: RE-DISS II

# Disclosure Guidelines

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Nuclear	0,0%	15,0%	17,9%
Hard Coal	0,0%	11,0%	18,6%
Lignite	0,0%	24,0%	24,9%
Natural gas	0,0%	15,0%	13,7%
Other fossil	0,0%	10,0%	4,5%
of which oil	0,0%	0,0%	1,1%
of which unspecified & other	0,0%	0,0%	3,3%
Hydro power	85,0%	22,0%	3,0%
Other renewable	15,0%	3,0%	17,4%
of which wind	5,0%	1,0%	8,1%
of which biomass	10,0%	2,0%	5,0%
of which photovoltaic	0,0%	0,0%	3,2%
of which geothermal	0,0%	0,0%	0,5%
of which unspecified & other	0,0%	0,0%	0,6%
CO <sub>2</sub> emissions	0 g/kWh	494 g/kWh	529 g/kWh
Radioactive waste	0 µg/kWh	450 µg/kWh	537 µg/kWh
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