

# Proposal for Criteria and Procedures for Recognition of GOs by Competent Bodies

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## Table of contents

<b>Table of contents.....</b>	<b>2</b>
<b>1 Introduction .....</b>	<b>3</b>
<b>2 Recognition terminology.....</b>	<b>4</b>
<b>3 Recognition procedures.....</b>	<b>4</b>
<b>4 Recognition criteria .....</b>	<b>5</b>
4.1 State of the earlier work of RE-DISS II (under Work Package 4.1).....	5
4.2 Proposed recognition criteria .....	6
4.2.1 Criterion 1: Implementation of Art. 3 (9) of the Directive 2009/72/EC by the Member State.....	7
4.2.2 Criterion 2: The issuing member state has implemented Art. 15 of the Directive 2009/28/EC .....	10
4.2.3 Criterion 3: The issuing member state ensures that no more than one GO is issued in respect of each unit of energy produced and the same unit of energy from renewable sources is taken into account only once (Art. 15 (2) 2009/28/EC).....	11
4.2.4 Criterion 4: The issuing member state ensures the function of a GO (Art. 15 (2) 2009/28/EC).....	12
4.2.5 Criterion 5: The Registry system is electronic, accurate, reliable and fraud resistant (Art. 15 (5) 2009/28/EC) .....	13
4.2.6 Criterion 6: Issued GOs include the minimum content of Art. 15 (6) 2009/28/EC .....	14
<b>5 Cross check between proposed recognition criteria and requirements as imposed by RES-Directive 2009/28/EC .....</b>	<b>15</b>
<b>6 Practicability of recognition criteria.....</b>	<b>17</b>
<b>7 Outlook .....</b>	<b>18</b>
<b>8 References.....</b>	<b>19</b>
<b>Annex I – The questionnaire answered by Competent Bodies in the 8<sup>th</sup> Domain Workshop in Brussels .....</b>	<b>20</b>

## 1 Introduction

Guarantees of Origin (GO) for electricity produced from renewable sources are implemented in European countries based on Art. 15 of RES Directive 2009/28/EC. Such GOs are traded in an internal market, and the RES Directive requires individual Member States, in principle, to recognise GOs from other Member States. The details on how such recognition could take place, and which reasons might justify a refusal to recognise a given GO are not clearly defined in the RES Directive, and therefore both national Competent Bodies as well as market participants are currently in an unclear situation on how to handle this. This might lead to in-transparent situations and market participants very often cannot differentiate between GOs which are recognised for disclosure and the ones which are not recognised in the moment of closing agreements or trading GOs.

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

The definition of the term “recognise” from the RES Directive is vague, therefore RE-DISS II further specified recognition as **the use of a GO issued in another country for national disclosure purposes**. Details and background information are published in an earlier report by the RE-DISS II project on recognition criteria and procedures (RE-DISS II 2014a).

It seems advisable that the quality of GOs issued in another country should ideally be approved before recognition. In contrast to that, country analysis as conducted by RE-DISS II (RE-DISS II 2014a, RE-DISS II 2014b) shows that often non-transparent methods are used within the Member States to prove the quality of GOs for recognition.

RE-DISS II considers it relevant to implement transparent criteria for the recognition of GOs issued in another country. This should be done at least on national level, but also a consistent application across Europe would have benefits. With the implementation of an agreed set of criteria the risk of market arbitrage is reduced, the market can function in a more transparent way for all market participants and higher trust in national systems for disclosure can be given.

This report covers proposals for recognition criteria for GOs for any fuel type and should help Competent Authorities in implementing a transparent set of criteria for recognition of foreign GOs for national disclosure purposes. Further, the actual approaches for recognising GOs will be displayed. First reactions of Competent Authorities and other stakeholders on the practical usability of the proposed criteria are shown to give an indication if the Member States theoretically support the proposed criteria and consider them as practical usable.

The proposed criteria for recognition are not binding for any Member State. In fact, they should support Member States in defining national criteria for recognition. The recognition criteria could be implemented as a package or in parts, as well as can serve as a basis for discussion only. Member States can implement the recognition criteria on a voluntary basis, they are not obliged to do so.

## 2 Recognition terminology

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

It seems appropriate that the term “recognition” in the Directive is understood with the meaning that a GO is accepted for a particular action or purpose similar to domestic GOs, like acceptance of imported GOs for national disclosure purposes. Different means and interpretations of recognition have been analysed in the report of the RE-DISS II Work Package 4.1 (RE-DISS II 2014a).

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

*“to accept foreign GOs for use in national disclosure schemes similar to own domestic GOs; this includes eligibility of these GOs for import and cancellation in the national GO registry.”*

A GO should not be restricted from being transferred between countries. RE-DISS II says that recognition of GOs is only possible if the respective GO fulfils the requirements to be cancelled for national disclosure purposes in the importing country.

## 3 Recognition procedures

The theoretical procedures for recognition have been stated in the report of the RE-DISS II Work Package 4.1 (RE-DISS II 2014a).

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

As a result of a survey among 15 Competent Authorities which was in detail published in the report of the RE-DISS II Work Package 4.1 (RE-DISS II 2014a):

- most national decisions on recognition of GOs issued in foreign countries for national disclosure purposes are based on the active decision of the Competent Authorities, the related Ministry or the Regulatory Authority on the basis of certain criteria.
- Only two Competent Authorities state that they recognise all GOs until complaints from the market arrive; and
- two countries do not have any procedure in place yet.

In certain countries the EECS standard is considered as a very important element for recognition, since GOs are accepted as long as they are EECS GOs and that there are no complaints.

Most countries only accept renewable GOs (and CHP GOs) as they have national systems for only renewable GOs in place. Other countries (e.g. Sweden, Austria) have implemented GO systems for all fuel types and therefore also accept certificates from other sources than renewables (fossil, nuclear, CHP).

These results have been confirmed without changes in the 8<sup>th</sup> RE-DISS Domain Workshop by the attending representatives of Competent Authorities. The decision to recognise GOs issued in another country is still in most countries subject to approval of Competent Authorities, Regulatory Authorities, Ministries or Issuing Bodies (ideally prior to import).

#### **4 Recognition criteria**

Recognition of GOs for national disclosure purposes is in most countries based on a decision by the organisation in charge for disclosure and/or GOs, which is the Regulator, the Ministry or the Competent Authority or a combination of them. In many countries, the process to check the quality of foreign GOs is not standardised and often no or in-transparent criteria for recognition are in place. When implementing rules to check GOs issued in other countries and imported into the national domain, countries should be aware that a check of individual GOs might not be practicable, as it might result in a lot of work for the Competent Authority. In any case, performing the check only ex post is hardly practicable. At the moment of checking, the supplier would have already used the foreign GO for disclosure and therefore integrated into the disclosure statement for customers. A non-recognition by the Competent Authority would result in an ex-post recalculation of the disclosure statement which most likely leads to confusion of final customers or loss of confidence in the supplier. Therefore, it is recommended that Competent Authorities should ideally implement overall system checks once they have implemented clear criteria on recognition in their national domains. GOs which are not accepted as they do not fulfil the applied criteria should be blocked from cancellation or marked in the system before they can be used by the supplier.

RE-DISS II has developed a set of recognition criteria for GOs for any fuel type which should help Competent Authorities in implementing a transparent set of criteria for recognition. Six first level criteria are displayed below, which are consistent with the criteria defined in the CA-RES questionnaire. As these have been approved by governmental representatives in the CA-RES initiative, this is taken as a starting point. However, these criteria are still quite vague and leave room for substantial interpretation. They are therefore hardly verifiable in a consistent manner unless they are further defined in a more detailed and specific way. Therefore, RE-DISS further specifies and elaborates the criteria with second and third level criteria.

The proposed recommendations for recognitions are not binding for any Member State. In fact, they should support Member States in defining national criteria for recognition. The recommendations or parts of it can be used on a voluntary basis by the Member States.

##### **4.1 State of the earlier work of RE-DISS II (under Work Package 4.1)**

Based on a survey in the 7<sup>th</sup> RE-DISS Domain Workshop for Competent Authorities which has been held in September 2013 in Brussels, RE-DISS II published in its first report of Work Package 4 (RE-DISS II 2014a) a first set of draft recognition criteria and a ranking, in descending sequence of relevance:

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

These seven main criteria consist of sub criteria which should be fulfilled to fulfil the main criteria.

As a result of further discussions and consultation with the questionnaire on recognition which has been developed by Working Group 10 of the CA-RES project<sup>1</sup>, the criteria have been revised. The criteria as are now proposed can be structured on three levels.

- On the first level, the criteria are consistent with the criteria which are defined in the CA-RES questionnaire. As these have been approved by governmental representatives in the CA-RES initiative, this is taken as a starting point. However, these criteria are still quite vague and leave room for substantial interpretation. They are therefore hardly verifiable in a consistent manner unless they are further defined in a more detailed a specific way.
- The second and third level criteria as now proposed are directly related to the main-level criteria as defined by CA-RES, and are to be applied as sub-level criteria which are more detailed and precise and therefore consistently verifiable. This should help to exclude all potential risks like double counting, fraud, double issuing, etc. In detail, this can deviate from the content of the open questions which have been formulated in the CA-RES questionnaire in relation to the defined CA-RES criteria. A major reason for this is the ambition to address all relevant aspects under the criterion where they have been considered to be of highest relevance, and to avoid duplication of sub-criteria under different first-level criteria at the same time. However, the adapted criteria for recognition do not only cover the defined CA-RES criteria, but also fully cover the draft criteria which have been developed with the Competent Authorities and the Advisory Board beforehand in earlier discussions (particularly the respective workshops as conducted in September 2013).

## 4.2 Proposed recognition criteria

The recognition criteria proposed by RE-DISS II include the criteria as defined by the CA-RES questionnaire, the results of the RE-DISS II findings together with the Competent Authorities and Advisory Group Members published in the earlier RE-DISS II report on recognition criteria (RE-DISS II 2014a) and the requirements from the RES-Directive 2009/28/EC and the Internal Markets Directive 2009/72/EC.

The recommendation for recognition criteria on first level as defined by CA-RES WG10 is the following, where each criteria is of the same relevance and no ranking is included:

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<sup>1</sup> Published for example from German Umweltbundesamt under the following link:  
[http://www.umweltbundesamt.de/sites/default/files/medien/377/dokumente/questionnaire\\_for\\_the\\_recognition\\_of\\_guarantees\\_of\\_origin.pdf](http://www.umweltbundesamt.de/sites/default/files/medien/377/dokumente/questionnaire_for_the_recognition_of_guarantees_of_origin.pdf)

1. Implementation of Art. 3 (9) 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)

As the main criteria need further specification in order to be consistently verifiable, two categories of sub-criteria are implemented to further specify and elaborate the main criteria. The sub-criteria to a main criterion are defined in a way that they should ideally be fulfilled in order to fulfill the respective main criterion.

In the 8<sup>th</sup> RE-DISS Domain Workshop for Competent Authorities and the 2<sup>nd</sup> Meeting of the RE-DISS II Advisory Group in September 2013 some stakeholders and participants raised the issue that a fulfillment of the main criteria plus eventually in addition the first sub level criteria would be sufficient. This is, of course, subject to a national decision in which detail, the criteria are used, if being applied at all. However, in case sub-level criteria as proposed are not being adopted, Competent Authorities have to define alternative specifications on how the higher-level criteria are being interpreted.

Almost all criteria as proposed here are supported by recommendations in the RE-DISS II Best Practice Recommendations document (RE-DISS II 2014c). The respective relation is indicated in Tables 1-6 below. The criteria which are not related to the specific Best Practice Recommendations are straightforward requirements directly deriving from the European Renewables Directive (2009/28/EC), which countries are obliged to fulfill by implementing them in their national law anyway. In other words, this means that by fulfilling the respective RE-DISS Best Practice Recommendations and the requirements of the Renewables Directive and the Internal Markets Directive (2009/72/EC), Member States can assure to a large extent that their national GOs should be considered accurate, reliable and veracious and therefore should not provide any reason for non-recognition when being imported by other countries.

#### **4.2.1 Criterion 1: Implementation of Art. 3 (9) of the Directive 2009/72/EC by the Member State**

This criterion can be considered as fulfilled based on the compliance with three sub categories, whereas the subcategories are fulfilled with the fulfilment of the third level criteria.

The majority of the second and third level criteria are linked to (a) Best Practice Recommendation(s).

Table 1: Criterion 1: Implementation of Art. (3) of the Directive 2009/28/EC (on electricity disclosure) by the Member State

<b>1</b>	<b>Implementation of Art. 3 (9) of the Directive 2009/72/EC (on electricity disclosure) by the Member State;</b> This can be considered fulfilled based on compliance with the following criteria:		<b>Compliance supported by BPR Nr.</b>
<b>1.1</b>	<b>National legislative implementation of disclosure system according to Art. 3 (9) of the IEM Directive 2009/72/EC, also including the following:</b>		<b>22</b>
1.1.1		Disclosure is mandatory at least for company's mix of all suppliers.	39a
1.1.2		Annual disclosure statement provided with or on bills and promotional material to customers.	39a
<b>1.2</b>	<b>No double counting with other explicit tracking mechanisms by fulfilling one of the following criteria:</b>		
1.2.1		No further tracking mechanism for RES besides GO and residual mix allowed for disclosure	16, 17
1.2.2		If further tracking mechanisms for RES besides GO and residual mix are allowed for disclosure, there should be transparent and reliable mechanisms to exclude double counting of RES production for which a GO is issued	several BPRs, including 16, 17, 23, 24, 29, 30, 31, 32
<b>1.3</b>	<b>No double counting between GO and any implicit default mix (like e.g. an uncorrected production mix).</b> This can be checked through implementation of one of the following options:		
1.3.1		No statistical default mix possible	none
1.3.2		Statistical default mix contains no RES at all	none
1.3.3		Use of a robust residual mix according to RE-DISS	26 a

As a requirement from the IEM Directive, a national disclosure system has to be implemented in national law. Member States have to assure that the information as provided by suppliers is reliable. Therefore, disclosure regulation should exclude double counting with other explicit tracking mechanisms and implicit default mixes.

A disclosure obligation has to be implemented in the national legislation (BPR 22) and suppliers need to publish at least the supplier mix on the annual bills and on the promotional material to customers (BPR 39a).

In the 8<sup>th</sup> RE-DISS Domain Workshop for Competent Authorities the RE-DISS II project team discussed with the attending Competent Authorities the necessity to include a third level criterion which need to be fulfilled under 1.1 referring to the obligation to disclose CO<sub>2</sub> emissions and radioactive waste on the disclosure statement or on a website to which the disclosure statement refers. This is an obligation coming from the IEM Directive, therefore Member States are obliged to implement this requirement. The Competent Authorities agreed that in case this information is missing while the other obligations deriving from the IEM Directive are fulfilled, then this would not mean that an imported GO should be considered not being accurate, reliable and veracious and should therefore not hinder countries to recognise these GOs for national disclosure purposes. The agreement was taken to leave that obligation out of the recognition criteria, as it doesn't lower the quality of a GO and only marginal the quality of the disclosure statement. Indeed, in case the requirements from the IEM Directive are not fulfilled without interference with other domains' disclosure system, this needs to be solved on national level.

Double counting with other explicit tracking mechanisms can be avoided when besides GOs, no further tracking mechanisms for RES and residual mix calculations are allowed (BPRs 16, 17). In case further tracking mechanisms besides GOs and residual mix are allowed, there should be transparent and reliable mechanisms in place to exclude double counting of RES (several BPRs, including 16, 17, 23, 24, 29, 30, 31, 32).

Double counting between a GO and any implicit default mix should be excluded. This can be done by either avoiding statistical default mixes or by general exclusion of RES from a statistical default mix. Ideally, a robust residual mix should be used according to the RE-DISS residual mix (BPR 26 a).

#### 4.2.2 Criterion 2: The issuing member state has implemented Art. 15 of the Directive 2009/28/EC

To further detail this criterion, three sub criteria are necessary, which are directly deriving from the Directive. Sub criterion 2.2 has a reference to one of the RE-DISS BPRs (which interprets the respective requirement from the Directive), the other two sub-criteria have no linkage to the BPR but need to be implemented as a direct requirement from the Directive.

The other requirements from Art. 15 2009/28/EC are covered in further criteria.

Table 2: Criterion 2: The issuing member state has implemented Art. 15 of the Directive 2009/28/EC

2	<p><b>The issuing member state has implemented Art. 15 of the Directive 2009/28/EC;</b> This can be considered fulfilled based on compliance with the following criteria:</p>	<p><b>Compliance supported by BPR Nr.</b></p>
2.1	<p><b>Standard size of GO is 1 MWh.</b></p>	<p><b>none</b></p>
2.2	<p><b>GO has to be used within (maximum) 12 months after the end of the production period.</b></p>	<p><b>3a</b></p>
2.3	<p><b>GO has to be issued by a Competent Authority which is officially appointed, independent from production, trade and supply, and whose responsibilities have no geographical overlap.</b></p>	<p><b>none</b></p>

The sub-criteria refer to some characteristics of a GO. The standard size of a GO needs to be 1 MWh, which is a requirement directly deriving from the Directive and with no reference to a Best Practice Recommendation. Further, a GO has to be used within maximum 12 months after the end of the production period. Although the general requirement is stated in the Directive, there is a reference to the more specific Best Practice Recommendation 3a. Third, the GO has to be issued by a Competent Authority which is officially appointed by law to fulfill this task. The Authority needs to be independent from production, trade and supply and should not have a geographical overlap in responsibilities with other Authorities. No Best Practice Recommendation is stated, as this requirement is clearly stated in the Directive.

**4.2.3 Criterion 3: The issuing member state ensures that no more than one GO is issued in respect of each unit of energy produced and the same unit of energy from renewable sources is taken into account only once (Art. 15 (2) 2009/28/EC)**

Two second level criteria and third level criteria are recommended to be fulfilled for the fulfillment of this criterion.

Table 3: Criterion 3: The issuing member state ensures that no more than one GO is issued in respect of each unit of energy produced and the same unit of energy from renewable sources is taken into account only once (Art. 15 (2) 2009/28/EC)

3	<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> This can be considered fulfilled based on compliance with the following criteria:</p>	<p><b>Compliance supported by BPR Nr.</b></p>
3.1	<p><b>No more than one GO is issued in respect of each unit of energy produced</b> by fulfilling one of the following criteria</p>	
3.1.1	<p>There should be no issuing of more than one GO for the same unit of electricity.</p>	14a
3.1.2	<p>This also applies to cogeneration plants which are using RES as the energy source: only one GO should be issued per unit of electricity.</p>	15a
3.2	<p><b>GO to be used only once</b>, also including the following criteria</p>	<b>13 (1)</b>
3.2.1	<p>GO is cancelled when being used.</p>	13 (2)
3.2.2	<p>GO can't be used or transferred after expiry, cancellation, export.</p>	13 (3), 13 (4)
3.2.3	<p>Exported GO are practically removed from the exporting registry.</p>	13 (5)
3.2.4	<p>Processes in the registry exclude duplication of GOs.</p>	13 (6)
3.2.5	<p>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.</p>	39b

Only one GO should be issued for each unit of energy produced. This sub-criterion can be approved with Best Practice Recommendation 14a, which excludes double issuing for the same unit of electricity. The same regulation applies for cogeneration plants where only one GO should be issued per unit of electricity. This is stated in the Best Practice Recommendation 15a.

Sub-criterion 3.2 specifies that GOs should be used only once, which is fulfilled with implementing Best Practice Recommendation 13(1). Therefore it needs to be guaranteed that a GO is cancelled when being used (BPR 13 (2)) and can't be further used or transferred nei-

ther after expiry, cancellation nor export (BPR 13 (3) and 13 (4)). Exported GOs need to be removed from the exporting registry which is fulfilled when implementing the Best Practice Recommendation 13 (5). Further, the registry needs to exclude a duplication of GOs to avoid double counting, which is implemented with Best Practice Recommendation 13 (6). In case suppliers disclose product mixes, this information needs to be given to all customers, including default products (BPR 39b).

#### 4.2.4 Criterion 4: The issuing member state ensures the function of a GO (Art. 15 (2) 2009/28/EC)

To further detail this criterion, the fulfilment of one more specific sub-criterion is recommended.

Table 4: Criterion 4: The issuing member state ensures the function of a GO (Art. 15 (2) 2009/28/EC)

4	<p><b>The issuing member state ensures the function of a GO (Art. 15 (2) 2009/28/EC);</b>                  This can be considered fulfilled based on compliance with the following criteria:</p>	<p><b>Compliance supported by BPR Nr.</b></p>
4.1	<p><b>The only purpose for GOs is disclosure, and no other (conflicting) purposes are existing for a GO in your country; particularly no accounting on EU RES targets.</b></p>	<p><b>13 (1)</b></p>

Criterion 4 derives from the Renewables Directive and further underlines the sole purpose for GOs as being disclosure. This criterion is implemented with Best Practice Recommendation 13 (1).

#### 4.2.5 Criterion 5: The Registry system is electronic, accurate, reliable and fraud resistant (Art. 15 (5) 2009/28/EC)

This is a requirement imposed by the Renewables Directive which leaves considerable room for interpretation and therefore further second and third level criteria are recommended, especially describing the meaning of accurate, reliable and fraud-resistant.

Table 5: Criterion 5: The Registry system is electronic, accurate, reliable and fraud resistant (Art. 15 (5) 2009/28/EC)

<b>5</b>	<b>The Registry system is electronic, accurate, reliable and fraud resistant (Art. 15 (5) 2009/28/EC);</b> This can be considered fulfilled based on compliance with the following criteria:		<b>Compliance supported by BPR Nr.</b>
<b>5.1</b>	<b>An electronic registry is implemented. (GO is an entry in an IT database system)</b>		<b>12 (1)</b>
<b>5.2</b>	<b>GOs are accurate, reliable and fraud-resistant</b> by fulfilling the following criteria		
5.2.1		Issuing of a GO is based on actual meter readings.	10 (1)
5.2.2		GO is only issued for RES-E which is then used by end-consumers (i.e. no pumped hydro).	10 (1)
5.2.3		There are mechanisms implemented for ongoing control of registered data (e.g. re-audits, random checks, etc.).	10 (2)
5.2.4		Sufficient measures are taken to ensure correct accounting of RES share of combustion plants.	10 (3)
5.2.5		Competent Body can correct errors in issued GOs, before they are exported, and is the only one with this competence.	10 (4)
5.2.6		Technical changes to plants are registered as soon as reasonably practically.	12 (2)
5.2.7		Issuing, handling, transfer and cancellation of GO in a secured registry with automated and auditable processes;	12 (1)
5.2.8		One comprehensive registry per domain	12 (1)
5.2.9		GO is imported via AIB Hub or another reliable interface from the other respective national registries.	7, 8

The Competent Authority needs to implement an electronic registry which is recommended by Best Practice Recommendation 12 (1). The statement in the Directive that a GO needs to be accurate, reliable and fraud-resistant is fulfilled by implementing the Best Practice Recommendations 7, 8, 10 (1)-10 (4), 12 (1) and 12 (2).

GOs should be issued based on actual meter readings for RES-E which are then used for disclosure for end-consumers (BPR 10 (1)). Mechanisms for ongoing control of registered data, like re-audits or random checks, should be implemented (BPR 10 (2)). Sufficient

measures should be taken to ensure correct accounting of RES shares of combustion plants (BPR 10 (3)), the Competent Authority is the only one to correct errors in issued GOs before they are exported (BPR 10 (4)) and technical changes to plants should be registered as soon as reasonably practicable, (BPR 12 (1)).

The processes of issuing, handling, transfer and cancellation of GOs should be handled in one comprehensive, secured registry with automated and auditable processes (BPR 12 (1)).

GOs are imported via the AIB Hub or another reliable interface from the other respective national registry (BPRs 7, 8).

#### 4.2.6 Criterion 6: Issued GOs include the minimum content of Art. 15 (6) 2009/28/EC

This criterion is based on the clearly stated requirement in the Renewables Directive. All requirements from the Directive need to be directly implemented by the Member States with their national law.

Table 6: Criterion 6: Issued GOs include the minimum content (Art. 15 (6) 2009/28/EC)

6	<b>Issued GOs include the minimum content (Art. 15 (6) 2009/28/EC);</b> This can be considered fulfilled based on compliance with the following criteria:	<b>Compliance supported by BPR Nr.</b>
6.1	<b>Energy source</b>	none
6.2	<b>Start and end date of production</b>	none
6.3	<b>Electricity, heating or cooling</b>	none
6.4	<b>Identification number, location, type and capacity of the installation</b>	none
6.5	<b>Investment support</b>	none
6.6	<b>Funding by any support scheme</b>	none
6.7	<b>Date when installation became operational</b>	none
6.8	<b>Date of issue</b>	none
6.9	<b>Issuing Country</b>	none
6.10	<b>Unique Identification number of GO</b>	none

The minimum content of a GO includes energy source (RES, fossil, nuclear: specific type), start and end date of production, the type of production (electricity or heating or cooling), a unique identification number, location, type and capacity of the installation, the information on received investment support (investment support, production support, combination of both), if the plant was funded when the installation became operational, the date of issue, the issuing country and a unique identification number of GOs.

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

The proposed RE-DISS II set of recognition criteria is tightly linked to requirements in the European legislation. The criteria either have been imposed directly from the RES-Directive 2009/28/EC or have been further specified based on the requirements in the Directive.

In the table below the relation between the recognition criteria and the requirements of Art.15 2009/28/EC is displayed. All criteria have at least one linkage to the RES-Directive, some have further linkages. Criterion 2 refers to all requirements of Art. 15 RES-Directive.

Member States are obliged to fulfil the requirements of the Directive. Therefore RE-DISS II reasons that Member States should fulfil the criteria for recognition with the full implementation of the requirements in Art. 15 RES Directive (taking some specific interpretations of the Directive into account). Further, the implementation of the proposed set of recognition criteria is not in conflict with European law and could therefore be implemented by Competent Authorities on a national basis.



Requirement 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 ensured	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 suppliers 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 (9) 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						x							1
3.2.2						x							1
3.2.3						x							1
3.2.4						x							1
3.2.5						x							1
4	x			x									2
4.1	x			x									2
5								x	x				2
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	7	2	12	3	2	8	2	3	13	12	1	4	4

## **6 Practicability of recognition criteria**

In the 8<sup>th</sup> RE-DISS Domain Workshop Competent Authorities were asked in a questionnaire (Annex I) to state if they consider the proposed RE-DISS II recognition criteria practicable and useable and if they could think of using them (in full/in parts) in their national systems.

The RE-DISS II team received 10 answers on these questions where eight out of 10 were in favour of the practicability of the criteria and think they are reasonable. Two Competent Authorities had no opinion.

Some countries stated that they have already guidelines in place but are willing to adapt the guidelines based on the RE-DISS proposal, others evaluated especially the first and eventually the second level criteria as relevant.

The overall picture based on the answers was a positive one and Competent Authorities seem to support the RE-DISS II recognition criteria.

## **7 Outlook**

RE-DISS II offers with its recognition criteria a set of recommendations which can be implemented by the Member States subject to their own decisions and requirements.

The assessment of all the criteria individually by each Competent Authority for each Domain would represent quite a lot of work. It might also be confusing for markets if countries draw different conclusions about countries from which GOs should be accepted for disclosure purposes, even when these decisions are based on the same or similar national criteria. RE-DISS II will publish in further reports of its Work Package 4.2 an analysis about the status quo of the implementation of European countries in comparison to the proposed RE-DISS II criteria based on the information of the qualitative data sheets as approved by the Competent Authorities towards RE-DISS II early 2014.

For some countries, the assessment for several criteria is facilitated based on the fact that they are issuing EECS-GOs, which means that many criteria are fulfilled. However, several disclosure issues are not covered by the EECS standard, and “only” 17 Domains are issuing EECS-GOs.

The update of the RE-DISS II country profiles early 2014 for the EU28+NO+CH+IS includes an inquiry amongst all national Competent Authorities about relevant parameters and current criteria and procedures for recognition of GOs and their usability in national disclosure frameworks. The provided information from this survey in combination with the proposed set of criteria for recognition in this report will be the basis for the publication of relevant up-to-date country specific information which can be used as starting point by Competent Authorities in their decision making on whether they recognise foreign GOs. This publication will be done under Work Package 4.2 in a cross-cutting analysis. The cross-cutting analysis will give information on the status quo implementation with respect to the proposed recognition criteria in individual countries, show the current practices of recognition in case they have changed and will include information on current cases of non-acceptance (if existent, so far no such cases exist).

Furthermore, as already announced in the earlier RE-DISS II report on recognition criteria (RE-DISS II 2014a), RE-DISS promotes the idea of implementing a database or central information platform in the medium run which includes and publishes all country-specific information considered relevant for Competent Authorities to decide on their set of criteria for recognising GOs issued in foreign countries. Such an information platform should be implemented either by a follow up organisation to RE-DISS II or by the Competent Authorities themselves.

### **Disclaimer:**

The sole responsibility for the content of this document lies with the authors. It does not necessarily reflect the opinion of the European Union. Neither the EASME nor the European Commission is responsible for any use that may be made of the information contained therein.

## **8 References**

- RE-DISS II (2014a): Angela Puchbauer-Schnabel, Dominik Seebach, Diane Lescot: Report on potential relevant criteria for acceptance of GO and on different possible approaches for acceptance procedures; Deliverable 4.1 of the RE-DISS II Project, 2014
- RE-DISS II (2014b): Country Profiles for European Countries, Update 2014, as published on the RE-DISS II project website [www.reliable-disclosure.org](http://www.reliable-disclosure.org), 2014
- RE-DISS II (2014c): Best Practice Recommendations for the implementation of Guarantees of Origin and other tracking systems for disclosure in the electricity sector in Europe, Version 2. 2, August 2014
- CA-RES Questionnaire on recognition criteria – published for example on the webpage on German Umweltbundesamt:  
[http://www.umweltbundesamt.de/sites/default/files/medien/377/dokumente/questionnaire\\_for\\_the\\_recognition\\_of\\_guarantees\\_of\\_origin.pdf](http://www.umweltbundesamt.de/sites/default/files/medien/377/dokumente/questionnaire_for_the_recognition_of_guarantees_of_origin.pdf)

## Annex I – The questionnaire answered by Competent Bodies in the 8<sup>th</sup> Domain Workshop in Brussels



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

### Questionnaire WP 4 recognition criteria

Country / organisation: .....

Contact person .....

Contact details (phone/email) .....

.....

Nothing has changed since the last survey

OR, please fill in:

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

Yes

No

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

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

.....  
.....

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Have you already rejected GOs from foreign countries? For which reasons

Yes

No

Reasoning:

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

Would the proposed criteria be reasonable to be implemented in your country?

Yes

No

What needs to be changed:

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1<sup>st</sup> level Criteria:

1. Implementation of Art. 3 (9) 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) 2009/297EC