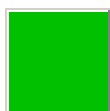


## Summary of the assessment of national guarantees of origin for electricity produced from renewable sources (GO) and disclosure systems for the purpose of decisions about the recognition of imported GO

### Finland



#### Introduction

The German Federal Ministry Economic Affairs and Energy (BMWi) and the German Federal Environment Agency (UBA) are currently assessing general questions on whether guarantees of origin for electricity produced from renewable sources (GO) from other Member States of the European Union and further states can be recognized in the course of Article 15 of the Directive 2009/28/EC. The evaluation of the legal and practical set-up of the national systems for GO and electricity disclosure is performed by a consortium of external lawyers (Becker Büttner Held Rechtsanwälte (BBH)) and consultants (Öko-Institut e. V.).



#### General

As of 08.08.2014, assessment of available information regarding system-related issues does not result in well-founded doubts about accuracy, reliability or veracity of GO issued in and imported from Finland, so that in accordance with Article 15 Directive 2009/28/EC, there seems to be no reason at present for non-recognition of such GO.

#### Specifics

Finnish GO meet all the **criteria mentioned in Article 15 Directive 2009/28/EC**. Finnish GO are issued for the standard size of **1 MWh** and **used for electricity disclosure only**. **Renewables are distinguished from other fuels** (namely nuclear and fossil) in electricity disclosure. As of disclosure year 2013, a **robust residual mix** is calculated based on the RE-DISS recommendations by the Energy Authority, including correct accounting for used GO. It should be noted that **within 2013, it had still been possible to sell RES-E products using other tracking instruments besides GO**, but any risk of double counting which might have arisen from that possibility does by definition not concern all RES volumes for which GO have been issued. Therefore, integrity of individual GOs is not jeopardised. Until coming into force of the new law in July 2013, producers have been able to choose having their GO issued in paper rather than electronically at Fingrid, but Fingrid as competent body was in a good position to exclude the possibility that two GO were issued for the same amount of RES-E.

GO which have to be properly cancelled and the residual mix are the only two ways to prove the origin of renewable electricity. There is **no evidence** that GO might be **used to meet the binding renewable energy targets** imposed by Article 3 Directive 2009/28/EC, nor to impact the calculation of the gross energy consumption. GO expire **12 months** after the end of the production period of the corresponding energy, which cannot be longer than one month (in case of very small plants, issuing only takes place after production of a complete MWh).

Finnish legal regulations as well as the EECS Rules which are applied by the TSO Fingrid, its subsidiary Finextra and Grexel safeguard that Finnish GO can be **used only once**. Fingrid is the **only competent body** in Finland for GO, while the function of the issuing body and operator of the electronic register to

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	<p>export and import them is assigned its subsidiary Finextra and then further on to Grexel, a private company and member of the AIB. All involved companies are <b>independent from production, trade and supply</b>. The rules in place in Finland, and here in particular <b>the EECS rules</b> which are applied, <b>safeguard accurate, reliable and fraud-resistant issuance, transfer and cancellation of GO and the electronic register</b>. There is no indication that Fingrid, Finextra or Grexel are acting in violation of those rules. The <b>competent body Fingrid as TSO is in charge of meter readings</b> itself, which serve as basis for issuing of GO (based on net production). Production devices are <b>audited when being registered</b>, with a <b>re-audit each five years</b>. Audits might be performed on-site or based on comparison with other registered data, e.g. from ETS or the national support system. Verification of fuel source for incineration plants includes approval of the calculation methodology of the fuel mix in combination with random checks of individual plants. Finnish regulations include <b>provisions both for correction of erroneous GO and of erroneous or outdated registered data for production devices</b>. Finnish GO include <b>all the information required by Article 15 (6) of the Directive</b>. Therefore, for the moment and regarding system-related issues, there are <b>no well-founded doubts as regards the accuracy, reliability or veracity of Finnish GO</b>, so that we concluded based on our assessments that they can generally be recognized.</p> <p><b>Critical issues</b></p> <p>Based on old legislation, RES volumes as covered by contract based tracking where probable to be double counted in a national residual mix. This does not directly affect those RES volumes which are covered by GO, but can in principle undermine consistency of the overall national disclosure system. The transition regulation, which allowed RES products to be sold in 2013 based on contract based tracking, but not to disclose the respective RES volumes in official electricity disclosure statements for the year 2013, led also to inconsistency between information given to consumers. However, this transition regulation leads to systematic underestimation of RES volumes in disclosure rather than to double counting of RES attributes as represented by GO.</p> <p><b>Reasons for non-recognition</b></p> <p>None.</p>
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**Please note**

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