



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
On behalf of the German Federal Environment Agency

Austria	
	<p>Introduction</p> <p>The German Federal Environment Agency (UBA) is 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 consultants (Öko-Institut e. V.) and lawyers (Becker Büttner Held Rechtsanwälte Wirtschaftsprüfer Steuerberater PartGmbB (BBH)).</p>  <p>General</p> <p>As of 07.02.2018, the 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 Austria. Therefore, there seems to be no reason at present for non-recognition of such GO in accordance with Article 15 Directive 2009/28/EC.</p> <p>Specifics</p> <p>Austrian GO meet all the criteria mentioned in Article 15 Directive 2009/28/EC. While Austrian GO can be issued on the basis of kWh, export is only possible in the standard unit of 1 MWh. The only purpose of GO is electricity disclosure, where renewables are clearly distinguished from other electricity sources. The Austrian disclosure system is fully based on GO, including GO from non-renewable sources, and no residual mix or any other statistical default mix may be applied. Thus, double counting of the attributes which are represented by a GO with any other accounting instrument can be excluded. 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. While the legal framework generally allows for a production period of up to one year, issuing usually takes place on monthly basis (at least for all automatic meter reading).</p> <p>Austrian legal regulations as well as the EECS Rules which are applied by the regulator E-Control safeguard that Austrian GO can be used only once. E-Control is the only competent body in Austria for GO, while the issuing itself is performed by the grid operators, who are also responsible for meter readings. The rules in place in Austria, and here in particular the EECS Rules which are applied, safeguard accurate, reliable and fraud-resistant issuance, transfer and cancellation of GO and the electronic register. There is no indication that E-Control or any other relevant party is acting in violation of those rules. The electronic EECS-compatible registry is connected to the German GO registry via the AIB Hub. E-Control as regulator can be considered independent from</p>

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	<p>production, trade and supply.</p> <p>Issuing takes place based on meter readings for net production, while pumping losses are taken into account as electricity consumption with a standard value of 25%. Production devices are audited when being registered, with a re-audit each five years by regional authorities or independent auditors. Verification of fuel source for incineration plants includes an annual documentation of the used primary energy sources. In case of multifuel plants this documentation has to be approved by an independent auditor. In case of grid-based biogas the relevant volumes have to be approved on a monthly basis by an independent auditor.</p> <p>Austrian regulations include provisions both for correction of erroneous GO and of erroneous or outdated registered data for production devices. Austrian GO include all the information required by Article 15 (6) of the Directive. Therefore, for the moment and regarding system-related issues, there are no well-founded doubts as regards the accuracy, reliability or veracity of Austrian GO, so that it can be concluded that they can generally be recognised.</p> <p>Critical issues</p> <p>Austrian legislation in principle allows for the issuing of GO for a production period of up to one year. Combined with a lifetime of GO of up to 12 months after the end of the production period, this might mean that a GO can have a lifetime of up to two years after the date of production of a given MWh. However, the standard case can be considered to be a monthly issuing (which is mandatory at least for production with automatic meter reading), which is in line with good practice as e.g. stipulated by the RE-DISS II Best Practice Recommendations.</p> <p>Reasons for non-recognition</p> <p>None.</p>
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Please note

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