



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 (UBA)

Cyprus	
	Introduction 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)).
	General As of 23.01.2018, 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 Cyprus, 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 Cypriot GO meet all the criteria mentioned in Article 15 Directive 2009/28/EC. They are issued for the standard size of 1 MWh and are used for electricity disclosure. However, copies of them can also be used in the context of the financial support scheme. In their electricity disclosure, suppliers have to clearly state their final supplier mix as well as the national mix, whereby there has to be a distinction between fossil, renewable and other sources. For that, only GO or the residual mix shall be used. The Cypriot TSO seems to use robust methods to calculate the residual mix, according to the RE-DISS Best Practice Recommendations. While it does contain a small amount of renewables, for those volumes no GO have been
	GO are not used to meet the binding renewable energy targets imposed by Article 3 Directive 2009/28/EC, neither do they impact the calculation of the gross energy consumption. They expire 12 months after the end of the production period. The Cypriot TSO is the only body in Cyprus competent to issue GO, and the electronic register to export and import them is also run by the Cypriot TSO. The rules in place in Cyprus, and here in particular the EECS rules which are already fully implemented in Cyprus, safeguard accurate, reliable and fraudresistant issuance, transfer and cancellation of GO and the electronic register. There is no indication that the TSO acts in violation of those rules. Cyprus has applied for an exemption from the ownership unbundling rules. The





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TSO is only **legally separate from the partly state-owned supplier.** This exemption is included in Directive 2009/72/EC, which is why it should not be cause problems in the context of the Directive 2009/28/EC.

Issuing of GO takes place for net production based on remote meter readings. The rules in Cyprus, including the EECS rules, include provisions both for the correction of erroneous GO and of erroneous or outdated registered data for production devices.

Cypriot GO include all the information required by Article 15 (6) of the Directive 2009/28/EC.

Therefore, for the moment regarding system-related issues, there are **no well-founded doubts as regards the accuracy, reliability or veracity of Cypriot GO**, so that they can generally be recognized.

Critical issues

Cyprus is not connected to the AIB hub yet. However, this is caused only by technical reasons. As the Cypriot TSO confirmed, all EECS rules are implemented.

Reasons for non-recognition

None.

Please note

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