



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

Czech Republic	
	<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 09.02.2018, 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 the Czech Republic. 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>Czech GO meet all the criteria mentioned in Article 15 Directive 2009/28/EC. Czech GO are issued in the standard unit of 1 MWh. The only purpose of GO is electricity disclosure, where renewables are distinguished from other electricity sources. The fact that the consumption of RES-E as is documented by cancelled GO leads to a tax exemption does not interfere with the adequate use of GO. In the Czech disclosure system RES-E GO are the only explicit tracking instrument besides the default residual mix which is calculated according to the RE-DISS methodology. 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, the EECS Domain Protocol restricts this in practice to a maximum production period of three months.</p> <p>Czech legal regulations as well as the EECS Rules which are applied by the market operator OTE safeguard that Czech GO can be used only once. OTE is the only competent body in the Czech Republic for GO. The rules in place in the Czech Republic, 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. OTE as market operators confirms to be independent from production, trade and supply.</p>

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	<p>Issuing takes place based on meter readings for net production, which are submitted by plant operators and compared by OTE with meter readings as submitted by the grid operators as authorised measurement bodies. Production devices are audited when being registered, with a re-audit each five years. Registration details are verified based on information gathered by the grid operator during an on-site audit which is part of the network connection process. Issuing of GO for incineration plants is based on a “consumption declaration” of the plant operator, while on-site audits or other independent verification measures are in the responsibility of the State Energy Inspection (SEI).</p> <p>Czech regulations include provisions both for correction of erroneous GO and of erroneous or outdated registered data for production devices. Czech 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 Czech GO, so that it can be concluded that they can generally be recognised.</p> <p>Critical issues</p> <p>The GO-related requirements of the RES Directive are considered to be only fully fulfilled for electricity production as of July 2016. Taking into account a maximum production period of three months, the lifetime of GO with an issuing date before 01 July 2016 will end (in Germany) at the end of September 2017 the latest. According to German expiry rules, as of October 2017 only Czech GO should be available which are fully compliant with all requirements of the RES Directive.</p> <p>Reasons for non-recognition</p> <p>None.</p>
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Please note

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