



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)

Estonia	
	<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 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 Estonia, 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.</p> <p>Specifics</p> <p>Estonian GO meet all the criteria mentioned in Article 15 Directive 2009/28/EC.</p> <p>They are issued for the standard size of 1 MWh and are used for electricity disclosure only. In particular, GO do not play a role in the support scheme. In the electricity disclosure renewables are clearly distinguished from other electricity sources. Renewables can only be disclosed by the use of GO or the residual mix. Further, it is mandatory to have the electricity disclosure confirmed by an auditor.</p> <p>The Estonian TSO Elering seems to use robust methods to calculate the residual mix, according to the RE-DISS Best Practice Recommendations. The residual mix only contains renewable production for which no GO have been issued.</p> <p>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.</p> <p>The Estonian TSO Elering is the only body in Estonia competent to issue GO, and the electronic register to export and import them is also run by Elering. GO expire 12 months after the production of the corresponding electricity.</p> <p>The rules in place in Estonia, 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 Elering acts in violation of those rules.</p> <p>According to the Estonian Electricity Market Act, the TSO has to be</p>

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	<p>independent from production, trade and supply.</p> <p>Issuing of GO takes place for net production based on remote meter readings. Estonian regulations include provisions both for the correction of erroneous GO and of erroneous or outdated registered data for production devices. Estonian GO include all the information required by Article 15 (6) of the Directive 2009/28/EC.</p> <p>Therefore, for the moment regarding system-related issues, there are no well-founded doubts as regards the accuracy, reliability or veracity of Estonian GO, so that they can generally be recognized.</p> <p>Critical issues None.</p> <p>Reasons for non-recognition None.</p>
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Please note

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