





**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)**

Greece	
  	<div style="display: flex; justify-content: space-between;"> <div style="width: 65%;"> <p><b>Introduction</b></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><b>General</b></p> <p>As of 14.02.2018, the assessment of available information regarding system-related issues results in well-founded doubts about accuracy, reliability or veracity of GO issued in and imported from Greece, so that in accordance with Article 15 Directive 2009/28/EC, there seems to be <b>a valid reason for non-recognition of such GO for the time being.</b></p> <p><b>Specifics</b></p> <p>Greek GO meet most, but not all the <b>criteria mentioned in Article 15 Directive 2009/28/EC.</b></p> <p>They are issued for the standard size of 1 MWh, for a production period of at most twelve months. They are <b>used only for electricity disclosure.</b></p> <p>According to available information, a regulation is going to oblige suppliers to disclose to their customers their energy mix of the preceeding year. In addition, such information is published on the website of the market operator LAGIE.</p> <p>The Greek market operator LAGIE calculates the residual mix, according to the RE-DISS Best Practice Recommendations (Shifted Transaction-based Method). This means that the residual mix can contain certain amounts of renewables, but that for those volumes either <b>no GO should have been issued, or the respective GO are expired.</b> Next to GO and the residual mix there are no other means of electricity disclosure.</p> <p>There is <b>no indication that GO are used to meet the binding renewable energy targets</b> imposed by Article 3 Directive 2009/28/EC, neither that they do impact the calculation of the gross energy consumption. They <b>expire 12 months</b> after the end of the period for which they were issued.</p> <p>The Greek market operator LAGIE is not the <b>only body</b> competent to issue GO in Greece. Next to LAGIE, which is responsible for the interconnected system, also the system operator HEDNO for the islands (non-interconnected system) and the Center for Renewable Energy Sources and Saving (CRES), for power plants not connected to the grid are competent bodies for the issuing of GO. However, their regional competences are clearly defined and do not overlap.</p> </div> <div style="width: 30%; text-align: center;">  </div> </div>

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Neither can producers choose between different issuing bodies, so that this should not increase the risk of double issuing. Further, it is only the electronic register run by LAGIE that shall be used for importing or exporting GO, and which seeks to be connected to the EECS hub.

The Greek legal framework (provided it is fully implemented as stated in the documents assessed) as well as the EECS rules (once they are fully applied) safeguard that Greek GO can be **used only once**. The rules in place in Greece and in particular **the EECS rules** which Greece will have to respect upon LAGIE becoming a member to the AIB safeguard accurate, reliable and fraud-resistant issuance, transfer and cancellation of GO and the electronic register.

The **state-owned market operator** LAGIE was in its current form created in 2011 to run the electricity market, and should be presumed to be independent from production, trade and transport. A recent law will lead to a changed organisational structure of LAGIE (which will be renamed as “Operator for RES & Guarantees of Origin”, but this is not expected to make a relevant change for the assessment of the independence or the GO system in total.

Issuing of GO generally takes place for net production based on **remote meter readings**. However, according to the EECS Domain Protocol, production volumes of plants with combined on-site storage unit are corrected for issuing by deduction of the volume of electricity which is fed into the grid from an on-site storage unit. **This procedure does not seem appropriate and can result in issuing more GO than what would be justified by net injection into the grid.** The rules in Greece, including the EECS rules to be applied upon AIB membership, include **provisions both for the correction of erroneous GO and of erroneous or outdated registered data for production devices**.

Greek 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 **well-founded doubts as regards the accuracy, reliability or veracity of Greek GO**, so that they cannot generally be recognized.

**Critical issues**

LAGIE has applied for AIB membership in May 2017. However, no decision has been taken yet. Further, in the application materials, LAGIE refers to a regulation on electricity disclosure to be adopted. While this assessment is based on such planned legislation, it is not clear whether the rules on electricity disclosure are already adopted and in force. This would need to be verified before connecting Greece to the EECS Hub.

As regards the calculation of the supplier mix, calculated and published by LAGIE, there are some uncertainties on the methods used. Those were intended to be solved through a new handbook. Whether this has effectively happened and solves the issues should be verified prior to Greece being connected to the EECS Hub.

Apparently, for storage facilities, an exception is made to the rule that GO are issued for net production: Instead, the electricity ultimately fed out is deducted from the electricity produced. This results in the issuance of GO for amounts of electricity which cannot be objectively justified. According to LAGIE, this is not

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	<p>relevant for the time being, as no such storage facilities are currently registered for the issuing of GO, but the regulation will be re-considered upon registration of any such device.</p> <p><b>Reasons for non-recognition</b></p> <p>Apparently, for storage facilities, an exception is made to the rule that GO are issued for net production, which can lead to the issuing of more GO than what would be justified by net injection into the grid (see above).</p> <p>Besides that, one should be aware that this assessment of the Greek GO system has been made based on available documents, assuming that these will all be fully adopted and implemented in this form by the time that the Greek GO registry will be connected to the AIB Hub. This includes the regulation on electricity disclosure, the EECS Domain Protocol and the outstanding clarification of calculation procedures in a new handbook. It has to be verified before first recognition of Greek GO that all these documents have been implemented without any unfavourable changes in the regulation.</p> <p>.</p>
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**Please note**

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