

# Summary of the evaluation of national systems for guarantees of origin for electricity from renewable sources (GO) and for electricity labelling for the purpose of a decision on the recognition of imported guarantees of origin on behalf of the Federal Environment Agency (UBA)

## Latvia

### Introduction

The German Federal Environment Agency (UBA) currently examines whether guarantees of origin for electricity from renewable sources (GO) from other Member States of the European Union and other states can in principle be recognised under Article 19 Directive (EU) 2018/2001 (RES Directive). The evaluation of the legal and practical implementation of the national systems for guarantees of origin and for electricity disclosure is supported by a consortium of external contractors (Öko-Institut e. V. and Becker Büttner Held PartGmbH (BBH)).

### General

As of 13 April 2022, the assessment of the available information on system-related issues does not lead to reasonable doubts as to the reliability or veracity of GOs issued in and imported from Latvia, thus Latvian GOs can be recognized in accordance with Article 19 of RES Directive.

### Specifics

Latvian GOs fulfil **all criteria according to Article 19 of RES Directive**.

GOs are issued for the **standard size of 1 MWh** of net electricity generation and are **used exclusively for the purpose of electricity disclosure**. In electricity disclosure, renewable sources are clearly distinguished from other electricity sources.

For electricity from renewable energies for which a public subsidy is claimed, either no GOs are issued or GOs are not issued to the plant operator as the holder of the subsidy claim, but to a public trader. Therefore, it is **not necessary to directly take the market value of the GO into account** for the plant operator's subsidy, as the latter **does not receive the value of the GO itself**.

Energy from renewable sources can be labeled in the fuel mix **solely on the basis of the national residual mix or by cancellation of GOs** (in the case of non-EECS GO also by ex-domain cancellation).

The Latvian transmission grid operator AST calculates the **residual mix according to the RE-DISS methodology**, which avoids double counting.

GOs are **not used to meet the mandatory targets of Article 3** of RES Directive, **nor do they affect the calculation of gross energy consumption**.

GOs for renewable energy generation from high-efficiency cogeneration can be issued as **combined RES-CHP GOs**. GOs **expire 12 months after the end of the generation period** (which is not longer than one month), unless they are cancelled or exported before then.

The regulations in place in Latvia, and in particular the EECS Rules, which are applied, ensure **accurate, reliable and fraud-proof issuance, transfer and cancellation of GOs**. There is no indication that AST is in breach of these rules. It is ensured that GOs are used only once and that the registry technically avoids further use of the GO after cancellation, expiry or export of the GO.

AST is the **only body in Latvia responsible for issuing GOs**. It is independent of production, trade and supply.

GOs are **issued for the net production of electricity** (excluding own consumption) used by final consumers. The amount of net production is verified on the basis of meter readings obtained by the grid operators. The Latvian regulations contain provisions both for the correction of incorrect GOs and for incorrect or outdated registered data of generation units.

Latvian GOs contain **all the information required by Article 19(7) of the RES Directive**.

Therefore, there are currently **no reasonable doubts about the accuracy, reliability or veracity of Latvian GOs in relation to system-related issues**. Thus, Latvian GOs can generally be recognized.

#### **Critical aspects**

No critical aspects were identified in the organisation of the systems for GOs and for electricity disclosure.

#### **Reasons for non-recognition**

None.

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