

# 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)

## Norway

### 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 1 July 2022, the assessment of the available information on system-related issues does not – in spite of some critical aspects – lead to general reasonable doubts about the reliability or veracity of GOs issued in and imported from Norway, so that, in accordance with Article 19 RES Directive, there currently appears to be no reason for not recognising such GOs.

### Specifics

Norwegian GOs fulfil (partly with restrictions) **all criteria according to Article 19 of Directive (EU) 2018/2001**.

GOs are issued for the **standard size of 1 MWh** net electricity generation. In electricity disclosure, renewable sources are clearly distinguished from other electricity sources. **Electricity from renewable sources can be labeled in the electricity disclosure on the basis of the national residual mix or by using GOs**, which must be cancelled for this purpose. The residual mix is shown on the homepage of the national regulator NVE instead of in the supplier's bill. Moreover, this information does not refer to the company-specific mix of the respective supplier, but to the national residual mix. With regard to the primarily relevant El-Certs subsidy system, it is ensured that **the value of the GO has been sufficiently taken into account** in terms of the RES Directive.

The **residual mix calculations published by NVE follow the method of the RE-DISS project** and thus avoid double counting. A reference by NVE on their homepage that the residual mix shown does not correspond to the actual supply to end consumers in Norway could be understood to mean that this value is irrelevant for consumers, which undermines the credibility of the residual mix.

GOs are not used to achieve the mandatory targets according to Article 3 RES Directive for renewable energy, nor do they affect the calculation of gross energy consumption.

The Norwegian state transmission system operator Statnett is the **only body** in Norway responsible for issuing GOs. It is **independent of production, trade and supply**.

GOs for renewable electricity generation from high-efficiency cogeneration can be issued by Statnett as **combined RES-CHP GOs**. They expire 12 months after the end of the generation period, unless they are cancelled or exported before then.

The rules in force in Norway, 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 Statnett is in breach of these rules. In particular, 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.

GOs are **issued for the net production of electricity** (excluding self-consumption) used by final consumers. The amount of net production is verified on the basis of **meter readings obtained from the grid operator** (for PV on the basis of confirmation from a third independent body approved by the regulator NVE). The Norwegian regulations contain provisions both for the correction of incorrect GOs and for incorrect or outdated registered data of generation plants.

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

Therefore, there are currently no reasonable doubts about the accuracy, reliability or veracity of the Norwegian HKNs in relation to system-related issues. Thus, Norwegian GOs can normally be recognised.

### **Critical aspects**

RES attributes that are reported in electricity labelling and documented by GOs can be double counted in GHG Protocol reporting under the location-based accounting approach. However, this implicit double-counting of RES properties with GHG reporting does not result directly from the regulation of GOs in Norway, but follows from the options of the GHG Protocol. However, it is particularly relevant here in view of the large quantity of exported GOs from Norway.

The electricity disclosure in Norway on the basis of the residual mix is not shown on the electricity bill of the supplier, contrary to the requirement by the IEM Directive, but only by reference to the homepage of the regulator NVE. In addition, this information only refers to the products that are not accounted for on the basis of GOs. In the case of product differentiation by a supplier, the residual mix therefore does not represent the information on the electricity mix of the supplier required by the IEM Directive, but only of a “grey” electricity product.

NVE refers on its homepage with the national electricity labelling to the fact that this electricity disclosure would not correspond to the actual supply of electricity to end consumers in Norway. The aforementioned quotation from the NVE homepage can also be understood as referring only to the fact that the total Norwegian consumption mix still contains GO products and that this therefore deviates from the residual mix shown. For consumers, however, there is also an obvious understanding according to which the stated balance is actually irrelevant for consumers as a whole.

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

None.

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