


**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)**

Portugal (Mainland)	
<div style="display: flex; flex-direction: column; gap: 10px;"> <div style="border: 1px solid black; width: 60px; height: 40px; margin: 0 auto;"></div> <div style="border: 1px solid black; width: 60px; height: 40px; margin: 0 auto;"></div> <div style="background-color: #00b050; width: 60px; height: 40px; margin: 0 auto;"></div> </div>	<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 recognised in the course of Article 15 Directive 2009/28/EC or – according to the current status only in excerpts examined – in the course of Article 19 Directive (EU) 2018/2001. 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 PartGmbH (BBH)).</p>  <p><b>General</b></p> <p>As of 16.04.2021, 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 Portugal (Mainland), so that in accordance with Article 15 Directive 2009/28/EC – respectively Article 19 Directive (EU) 2018/2001, insofar as it has been audited –, there seems to be <b>no reason at present for non-recognition of such GO.</b></p> <p><b>Specifics</b></p> <p>Portuguese GO meet all the <b>criteria mentioned in Article 15 Directive 2009/28/EC</b> – respectively Article 19 Directive (EU) 2018/2001, insofar as it has been audited.</p> <p>They are issued for the standard size of 1 MWh net electricity production which is fed into the grid and are <b>used for electricity disclosure only</b>. In the electricity disclosure, which is updated quarterly, renewables are clearly distinguished from other electricity sources. Renewable electricity can <b>be disclosed by application of the residual mix or by the use of GO which have to be cancelled by the respective suppliers</b>. Furthermore, <b>bilateral contracts</b> can be applied if no GO for the respective volumes are issued <b>according to an approval by ERSE</b>, the regulatory authority.</p> <p>The residual mix calculations which are performed by ERSE are updated quarterly and avoid double counting of Portuguese GO. In order to take imports into account, production data provided by the Spanish TSO REE is applied. However, unless this data is fully corrected for issued GOs in Spain, this can in practice lead to double counting of Spanish GOs.</p> <p>GO are <b>not used to meet the binding renewable energy targets</b> imposed by Article 3 Directive 2009/28/EC, neither do they impact the calculation of the gross energy consumption.</p>

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	<p>EEGO, which is a subsidiary to the Portuguese TSO REN, is the <b>only body</b> in Portugal competent to issue GO. It has confirmed to be <b>independent from production, trade and supply</b>.</p> <p>GO can be transferred up to 12 months after the end of the production periods, which have a standard period of 1 month, while cancellation takes place after 18 months at the latest.</p> <p>The rules in place in Portugal, and here in particular <b>the EECS rules</b> which are applied, safeguard accurate, reliable and fraud-resistant issuance, transfer and cancellation of GO and the electronic register. There is no indication that REN/EEGO acts in violation of those rules. In particular, it is ensured that GO may be used only once and that the registry technically avoids further handling of the GO after cancellation, expiry or export of the GO.</p> <p>Issuing of GO takes place on request of the plant operators for net production of electricity (excluding own consumption) which is used by final consumers. The amount of net production is verified against <b>meter readings provided by the respective grid operator</b>. Portuguese regulations include <b>provisions both for the correction of erroneous GO and of erroneous or outdated registered data for production devices</b>.</p> <p>Portuguese GO include <b>all the information required by Article 15 (6) Directive 2009/28/EC</b> respectively Article 19 (7) Directive (EU) 2018/2001 (besides an explicit reference to the energy type which is covered, being electricity rather than gas).</p> <p>Therefore, there are <b>no well-founded doubts as regards the accuracy, reliability or veracity of Portuguese GO</b> with respect to system-related issues for the time being. Thus, Portuguese GO can generally be recognised.</p> <p><b>Critical issues</b></p> <p>The option that RES-E may be disclosed not only based on GO but also based on bilateral contracts is not in line with Art. 19 (8) Directive (EU) 2018/2001. Besides this limitation, the recognition of Portuguese GOs appears to be valid also under the Directive (EU) 2018/2001 after an initial, non-conclusive assessment. In particular, the revised standard CEN – EN 16325 has not yet been considered.</p> <p>Unless the production mix for imports from Spain is corrected for issued GOs, the application of this data in Portugal may lead to double counting of Spanish GOs.</p> <p><b>Reasons for non-recognition</b></p> <p>None.</p>
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