



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)

Spain	
	<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 Spain, 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>Spanish GO meet all the criteria mentioned in Article 15 Directive 2009/28/EC. They are issued for the standard size of 1 MWh and are used for electricity disclosure only. Renewables are clearly distinguished from other electricity sources in electricity disclosure.</p> <p>Spain seems to use robust methods to calculate the residual mix, although it is difficult to comprehend every detail. This concerns, in particular, the question, which electricity attributes are taken into account for the residual mix calculation when electricity is imported. However, CNMC (Comisión Nacional de los Mercados y la Competencia (National Regulator Authority)) assured that there is no double counting of renewable attributes in Spain.</p> <p>Spanish 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. They expire automatically 12 months after the end of the production period, while issuing takes place on a monthly basis. In addition, all Spanish GO issued in one year "n" have to be part of electricity disclosure in the following year "n + 1" until the 31.03. After this time transfers or other activities related to Spanish GO are no longer possible.</p> <p>CNMC is entrusted as the only body in Spain competent to issue GO, and the electronic register to export and import them is also run by CNMC. The rules in place in Spain, 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 CNMC acts in violation of those rules.</p>

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	<p>As CNMC is the national regulatory authority, it can be considered independent from production, trade and supply. Issuing of Spanish GO takes place for net production based on meter readings. Spanish regulations include provisions both for the correction of erroneous GO and of erroneous or outdated registered data for production devices. Spanish 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 no well-founded doubts as regards the accuracy, reliability or veracity of Spanish GO, so that they can generally be recognized.</p> <p>Critical issues</p> <p>The spanish law („CIRCULAR 1/2008: ANEXO I Método de Cálculo“) explains und illustrates the calculation for the residual mix. However, it is difficult to comprehend every detail. CNMC assured on explicit demand that there is no double counting of renewable attributes in Spain.</p> <p>Reasons for non-recognition</p> <p>None.</p>
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Please note

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