



**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)**

Slovakia	
	<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 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 PartGmbH (BBH)).</p>  <p><b>General</b></p> <p>As of 17.08.2020, 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 Slovakia, so that in accordance with Article 15 Directive 2009/28/EC, there seems to be <b>no reason at present for non-recognition of such GO</b>.</p> <p>This assessment refers for GO with <b>issuing date and production period as of 1 January 2020</b>.</p> <p><b>Specifics</b></p> <p>Slovakian GO meet 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 net electricity production which is fed into the grid and are <b>used for electricity disclosure only</b>. In particular, GO do not play any role in the support scheme. In the electricity disclosure renewables are clearly distinguished from other electricity sources. Renewable electricity can <b>only be disclosed by application of the residual mix or by the use of GO which have to be cancelled by the respective suppliers</b>.</p> <p>The residual mix calculations which are performed by Grexel on behalf of the Association of Issuing Bodies (AIB) are directly used by the Slovakian Short-Term Electricity Market Organiser OKTE for publication of the national “energy mix of electricity supply”. The applied method ensures that a double counting of the GO with a residual mix is avoided.</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> <p>Since 1 January 2020 OKTE is the <b>only body</b> in Slovakia competent to issue GO. OKTE is a subsidiary to the Slovakian transmission system operator and has confirmed to be <b>independent from production, trade and supply</b>.</p> <p>GO <b>expire 12 months</b> after the end of the production periods, which have a standard period of 1 month.</p>

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	<p>The rules in place in Slovakia, 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 OKTE 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>. Slovakian regulations include <b>provisions both for the correction of erroneous GO and of erroneous or outdated registered data for production devices</b>.</p> <p>Slovakian GO include <b>all the information required by Article 15 (6) of the Directive 2009/28/EC</b>.</p> <p>Therefore, there are <b>no well-founded doubts as regards the accuracy, reliability or veracity of Slovakian GO</b> with respect to system-related issues for the time being. Thus, Slovakian GO can generally be recognised.</p> <p>After an initial, non-conclusive assessment, the recognition appears to be valid also under the Directive 2018/2001 (EU). In particular, the revised standard CEN – EN 16325 has not yet been considered.</p> <p><b>Critical issues</b> None.</p> <p><b>Reasons for non-recognition</b> None.</p>
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**Please note**

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