



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

Sweden	
	<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 Sweden. Therefore, there seems to be no reason at present for non-recognition of such GO in accordance with Article 15 Directive 2009/28/EC.</p> <p>Specifics</p> <p>The Swedish tracking system includes national GO and EECS GO. National GO are only transferrable within Sweden and production devices can only receive national or EECS GO. Therefore national GO are of no relevance for the question of recognition of GO imported from Sweden to Germany. In the following the term GO refers to EECS GO and not to national GO in Sweden.</p> <p>Swedish GO meet all the criteria mentioned in Article 15 Directive 2009/28/EC. Swedish GO are issued in the standard unit of 1 MWh. The only purpose of GO is electricity disclosure, where renewables are clearly distinguished from other electricity sources.</p> <p>In the Swedish disclosure system, the default residual mix is calculated by the Energy Market Inspectorate. In Sweden not the national residual mix but the Nordic residual mix (including also Denmark, Finland and Norway) is disclosed to consumers. As the other Nordic countries use a national residual mix in their national disclosure systems this inconsistency allows for double counting of renewable attributes in Sweden. According to the residual mix published by the Swedish Energy Market Inspectorate, the calculated share of renewable energy in 2016 is 16.3%¹. In contrast, the share of renewable energy in the national residual mix for Sweden calculated by the Association of Issuing Bodies is only 9.21%². However, this accounting inconsistency does not affect Swedish GO that are exported to Germany. Therefore all Swedish GO imported from Sweden to Germany are correctly accounted for. According to the Swedish Issuing Body Energimyndigheten, it is also currently considered to switch to a disclosure of the national residual mix.</p>

¹ <http://ei.se/sv/for-energiforettag/el/ursprungsmarkning-av-el/#hanchor5>

² https://www.aib-net.org/documents/103816/176792/AIB_2016_Residual_Mix_Results.pdf/6b49295b-ad99-a189-579e-877449778f62

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	<p>Schwedish disclosure is based on the two tracking methods GO and the residual mix. However, according to the Electricity Law 1997:85 and disclosure regulation 2013:13 other methods might also be used to prove that imported energy from outside the EU is produced from renewable energy sources. But these provisions are of no practical relevance as Sweden has no border to non-EU-members (Norway is considered as an EU country as it has implemented the respective EU directives). Energimyndigheten also confirmed that these provisions are not applied for disclosure.</p> <p>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. GO expire 12 months after the end of the production period, while issuing takes place on a monthly basis.</p> <p>Since 01.06.2017 Energimyndigheten is the only Issuing Body in Sweden for GO. Until 01.06.2017 the handling of GO has been delegated to the Finnish company Grexel Systems by the designated competent body. Until 31.12.2017 Grexel will continue to issue GO for generation until 31.05.2017. Swedish legal regulations as well as the EECS Rules which are applied by Energimyndigheten and by Grexel safeguard that Swedish GO can be used only once.</p> <p>The rules in place in Sweden, 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 Energimyndigheten or Grexel is acting in violation of those rules. Energimyndigheten as the Swedish Energy Agency and Grexel as a software company are independent from production, trade and supply.</p> <p>Issuing takes place based on meter readings for net production, which are submitted electronically. Production devices are audited when being registered by independent third parties and re-registration is necessary each five years.</p> <p>Swedish regulation includes provisions both for correction of erroneous GO and of erroneous or outdated registered data for production devices. Swedish GO include all the information required by Article 15 (6) of the Directive. Therefore, for the moment and regarding system-related issues, there are no well-founded doubts as regards the accuracy, reliability or veracity of Swedish GO, so that it can be concluded that these can generally be recognised.</p> <p>Critical issues</p> <p>Sweden refers to the residual mix for the Nordic area, while other countries within that area use a national residual mix. This inconsistency allows for the double counting of renewable attributes. However, this accounting inconsistency does not affect Swedish GO that are exported to Germany. Therefore all Swedish GO imported from Sweden to Germany are correctly accounted for. According to the Swedish Issuing Body Energimyndigheten, it is currently considered to switch to a disclosure of the national residual mix.</p> <p>Reasons for non-recognition</p> <p>none</p>
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Please note

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