

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 Ministry for Economic Affairs and Energy

Italy



Introduction

The German Federal Ministry for Economic Affairs and Energy (BMWi) and the German Federal Environment Agency (UBA) are 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 lawyers (Becker Büttner Held Rechtsanwälte (BBH)) and consultants (Öko-Institut e. V.).



General

As of 23.07.2014, 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 Italy, 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.

Specifics

Italian GO meet all the **criteria mentioned in Article 15 Directive 2009/28/EC**. Italian GO are issued for the standard size of **1 MWh** and are **used for electricity disclosure only**. Fuel mix is disclosed as of May of the year X+1 both for the year X and the year X-1. **Renewables are distinguished from other fuels**, namely coal, natural gas, oil, nuclear and others.

Disclosure information of Italian suppliers can be based on the following tracking mechanisms: for RES-E, the **cancellation of GO** is mandatory. For other volumes bought or produced in Italy, the **national residual mix** as calculated by GSE has to be used, which is corrected for cancelled and exported GO. For all further volumes for coverage of electricity volumes which are imported, GSE publishes a **proxy value for the European Mix** for the year X based on Eurostat production data for EU27+NO+IS-IT for the year X-1. This European proxy value is **not a residual mix** and can therefore **double count RES attributes** of non-Italian RES production for which a GO has been used.

CHP GO system is still under development under responsibility of GSE, so that no final assessment on exclusion of double counting between both instruments can be made for the time being. However, as GSE is the competent body for both types of GO, they should be in a good position to exclude double issuing for RES CHP production. There is **no evidence** that GO might be **used to meet the binding renewable energy targets** imposed by Article 3 Directive 2009/28/EC, nor to impact the calculation of the gross energy consumption. GO expire either **12 months** after the end of the production period of the corresponding energy, which cannot be longer than one month, or at end of March of the following year (whatever is earlier).

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	<p>Italian legal regulations as well as the EECS Rules which are applied by GSE safeguard that Italian GO can be used only once. GSE is the only competent body in Italy for GO. The rules in place in Italy, 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 GSE is acting in violation of those rules. GSE is a governmental body and can be considered independent from production, trade and supply. Issuing takes place for net production based on meter readings provided by grid operators and which are rounded either up or down on full MWh for the respective meter period. However, GSE has shown that this does not imply a systematic rounding up and therefore overestimation of RES volumes when issuing GO. Documentation for production devices is checked when being registered, and can be audited on-site without further notice on random basis. Italian regulations include provisions both for correction of erroneous GO and of erroneous or outdated registered data for production devices. Italian GOs 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 Italian GO, so that it can be concluded that they can generally be recognized.</p> <p>Critical issues</p> <p>The European proxy value which is to be used for imported electricity is not a residual mix and can therefore double count RES attributes of non-Italian RES production for which a GO has been used. This double counting does not refer to volumes which are covered by Italian GO and do therefore not give reason for non-recognition of Italian GO according to our assessment. Still, it is a general shortfall of the overall Italian disclosure system which also might have negative impact on reliability of overall GO and disclosure systems in Europe.</p> <p>Furthermore, a general inaccuracy is introduced by referring to production statistics of the year X-1 instead of the year X, although this is then corrected in the following year, when the information is updated based on the then final Eurostat production statistics (for disclosure of the fuel mix of the year X-1 by Italian suppliers).</p> <p>Reasons for non-recognition</p> <p>none</p>
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Please note

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