



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	
Slovenia	
	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 29.07.2014, 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 Slovenia, 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 Slovenian GO meet all the criteria mentioned in Article 15 Directive 2009/28/EC. GO relate to 1 MWh electricity. GO are only used for electricity disclosure. GO issued for electricity which receives financial support in the context of the Slovenian support scheme for renewable energy are cancelled to avoid double-use and double-counting. The corresponding attributes for renewable energies are taken into account when calculating the residual mix. Based on a Directive from 2013, the system of electricity disclosure has been entirely updated and improved. This also covers the calculation of the residual mix, which now only includes renewable electricity for which the GO have been cancelled due to participation in the support scheme or have expired 12 months after the production period. The production period for issuing GO is limited to one month. There are no indications that Slovenia is using GO in order to reach their binding national renewable energy target under the Directive 2009/28/EC or in the course of the calculation of the gross energy consumption. GO can be used
	only once, which is not only provided for by the relevant legal provisions but also by the EECS rules that are applied in Slovenia. The issuing body in Slovenia is the regulator AGEN-RS, the electronic register is maintained by Borzen, the independent market operator. GO are issued, used and transferred electronically using the AIB hub. There are mechanisms in place to control the issuance, transfer and expiry of GO. All installations have to be registered upon which occasion AGEN-RS can already request additional information if necessary. The issuance is then based on the metering data

collected by the grid operators. Registration has to be renewed every five years,





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

and producers are legally and contractually obliged to update the information. Further, AGEN-RS has wide monitoring powers, such as on-site inspections. Relevant legislation foresees penalties in case of wrong or missing information. GO contain all the **information required by the Directive 2009/28/EC**.

Therefore, for the moment and regarding system-related issues, there are no well-founded doubts as regards the accuracy, reliability or veracity of Slovenian GO, so that according to the assessment done, we have concluded that they can generally be recognized.

Critical issues

none

Reasons for non-recognition

none

Please note

This summary, published by the German Federal Environment Agency (UBA), was prepared on the basis of the project-related contractual relationships between the Federal Ministry for Economic Affairs and Energy (BMWi) and Becker Büttner Held (BBH) and the Öko-Institut e.V. The publication or dissemination of the summary to third parties shall not create any legal relationships between BBH and/or the Öko-Institut e.V. and the respective third party; in particular, no legal mandate or consultancy contract shall be established. While all due care has been taken in the preparation of these summaries, neither BBH nor Öko-Institut e.V. assume any guarantee, liability or responsibility as regards their content towards third parties. BBH and Öko-Institut e.V. are not obliged towards third parties to submit any additional information or explanations as regards the content of the summaries.