

# The RE-DISS final conference



The RE-DISS project (Reliable Disclosure Systems for Europe, [www.reliable-disclosure.org](http://www.reliable-disclosure.org)) has been discussed in previous newsletters. The aim of this project was to help competent authorities for GOs and disclosure in the EU and EEA countries transpose the RES Directive (2009/28/EC, article 15) and the IEM Directive (2009/72/EC, article 3 §9) into a reliable and sound framework for the tracking of electricity.

RE-DISS presented its achievements at its final conference, on 12th September in Brussels. VREG kindly hosted the event, which attracted representatives of 17 competent authorities for GOs and/or Disclosure, and a mixed audience of suppliers, traders, consumer associations and energy consultants.

In the introductory session, Tom Howes of the European Commission (DG ENER) stressed the importance of E-TRACK and RE-DISS to “make up for the broad words of the Directive”. RE-DISS helps the different tracking systems implemented in individual Member States to work together effectively. Mr Howes also stressed that such projects promote higher protection for electricity consumers, and strengthen development of their interest in renewable energy.

RE-DISS proposes a set of Best Practice Recommendations (the RE-DISS BPR) for implementing the Directives: the 11 competent authorities formally participating in the project agreed to support and develop these in their own countries.

Christof Timpe of Oeko-Institut (the project coordinator) explained the latest developments of the BPR (which can be downloaded from the website by clicking [here](#)<sup>1</sup>). They consist of criteria for recognising GOs from other EU and EEA countries. This helps implement articles 15.9 and 15.10 of the RES Directive, which provide that a Member State can solely refuse GOs from another Member State if it has well founded doubts on their reliability, veracity and accuracy. The BPR

contains the following elements to assess the reliability of GOs:

- Electronic interfaces for imports should be specified
- GOs should be issued based on Art. 15 of Directive 2009/28/EC or compatible national legislation, and should meet related requirements
- Exporters should have implemented full disclosure, reflecting the export of GOs
- Issuing and exporting countries should have implemented measures to avoid double counting of GO attributes, including:
  - ensuring the exclusivity of GO for disclosure purposes
  - having implemented clear rules for domestic disclosure
  - using a proper Residual Mix (or equivalent measures)
  - ensuring that GO attributes are not used in issuing or exporting countries unless such GOs are cancelled there.

It is also recommended that a registry should be maintained where Member States may notify GOs they have accepted or rejected.

The RE-DISS BPR also takes into account the Cooperation Mechanisms, and states that these relate to target accounting rather than relating directly to disclosure. However, joint projects and joint support schemes should clarify the allocation to stakeholders of GOs relating to the electricity produced under such mechanisms – for instance, what proportion of GOs go to the supporting party from the other country, and what proportion of GOs go to the hosting country?

In the first panel discussion, Angela Puchbauer-Schnabel (E-Control), Katrien Verwimp (VREG), Helga Bardadottir (Icelandic Ministry of Industry and Energy) and Christian Nielsen (Energinet.dk) endorsed the benefits of following the recommendations of RE-DISS.

Exporters following the RE-DISS recommendations know that they



run little risk of their GOs being rejected by importing Member States; while importers will be comforted that there is no double-counting of the imported GOs by knowing that exporters are abiding by RE-DISS recommendations. Katrien Verwimp stressed that “Belgium produces 7% of RES electricity, but if one adds all commercial mixes, the share of RES-E amounts to more than 50% thanks to imported GOs. Disclosure is a really big thing in Belgium.” Protecting end-consumers is crucial for any regulator, and avoiding double-counting is a major aspect of consumer protection. During the second panel discussion, it became clear that competent authorities for disclosure find the calculation methodology explained in the RE-DISS BPR most useful.

This was born out by the analysis carried out by Claudia Raimundo (IT Power) and Diane Lescot (Observ’ER). This shows that 11 out of the 15 countries represented have a methodology for calculating a residual mix that is either based on – or close to - the RE-DISS BPR. Competent authorities participating to the RE-DISS project urged other competent authorities to follow their lead in using the AIB inter-registry Hub, and implementing the methodology for calculating their residual mix: “This would make everybody’s life easier!” stressed Angela Puchbauer Schnabel.

Helga Bardadottir highlighted that the RE-DISS BPR represent very operational guidelines for Member States that have not thoroughly transposed the European legislation on disclosure and GO, and that the RE-DISS project offered an opportunity to learn from the experience of other Member States.

Markus Klimscheffskij (Grexel) calculated that double-counting errors

linked to implicit tracking had been substantially reduced thanks to the implementation of the RE-DISS methodology. The size of the reduction amounted to 150 TWh, of which 110 TWh is renewable source electricity. This represents a correction of about 7%, given that the total consumption for the 15 countries is close to 2,170 TWh. The potential for further error correction is even higher: improvements linked to explicit tracking include prohibiting the use of contract and RECS certificates as tracking instruments, and using the EECS standard for GOs.

While RE-DISS made important progress during the last three years, tracking systems need to be fine-tuned in a number of Member States, and implemented in others - specifically those countries where the electricity market has yet to be fully opened.

RE-DISS has proposed to the European Commission a follow-up project (RE-DISS II), which will pay specific attention to CO<sub>2</sub> and additionality, and which Dominik Seebach (Oeko-Institut) introduced to the audience. This project will also focus more on the supplier side than RE-DISS, where the primary target was competent authorities for GOs and disclosure. It has been recommended for funding by the EACI, and the consortium is now negotiating the contract. RE-DISS II should start in time to enable residual mixes for 2012 to be produced during spring 2013.

<sup>1</sup> [http://www.reliable-disclosure.org/static/media/docs/RE-DISS\\_BestPractice\\_Recommendations\\_v2.o.pdf](http://www.reliable-disclosure.org/static/media/docs/RE-DISS_BestPractice_Recommendations_v2.o.pdf)