

RECS

ENERGY CERTIFICATE

ASSOCIATION

ADVOCACY ON FULL CONSUMPTION DISCLOSURE AND THE RED-3

Webinar for RECS members

14.06.2022

Adam White, Secretary-General



Intro to different forms of full disclosure:

- Full production disclosure
- Full consumption disclosure
- Full supplier disclosure

Support for Full Consumption disclosure with a supplier mandate

Supplier can be of energy and/or GOs

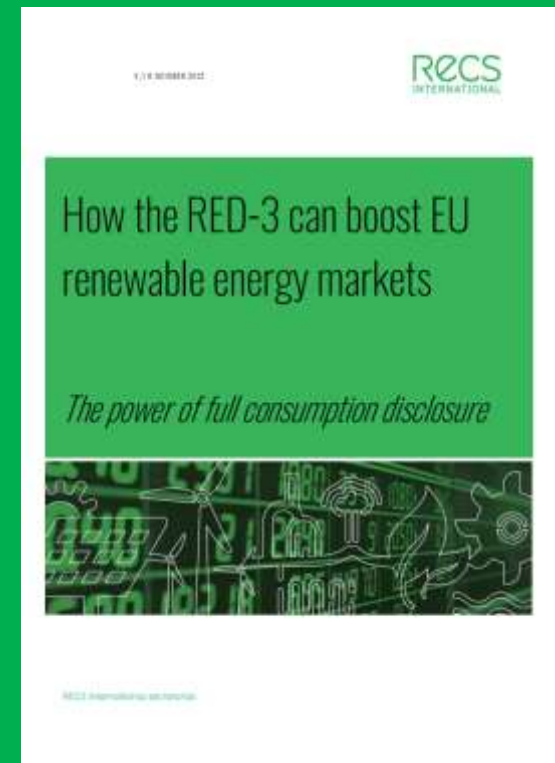


Providing an example of full consumption disclosure with a supplier mandate in practice

Sets out the changes to the system

Provides data on the first two years of the system

Highlights the benefits to consumers of such systems



Highlights the positive steps already proposed by the Commission

Makes the case of including Full Consumption Disclosure in the RED-3

Provides a possible amendment for the European Parliament or Council to include in Article 19 of the RED-3.

Amd #	Key Amd?	Amending C'ion proposal	Amending RED-2	MEP(s)	Objective (summarised) <i>Italic denote RECS commentary</i>	Support Oppose ? / N/A
30	N	Rectal 13	N/A	Peiper (EPP) (rapporteur)	Calls for higher temporal granularity in GO Schemes	Support
31	N	Art 1.1.5.c (new)	Art 15.8.a (new)	Peiper (EPP) (rapporteur)	Introduces new text calling for GOs to be used in hydrogen purchase agreements	Support
34	N	Art 1.1.5.f	Art 15a.2.2	Peiper (EPP) (rapporteur)	Allows minimum use of renewables in new and existing buildings subject to renovation to be met using GOs	Support
41	Y	Art 1.1.8.a.i	Art 19.2.1	Peiper (EPP) (rapporteur)	Requires MS to: <ul style="list-style-type: none"> provide for GOs to be issued for low carbon hydrogen and for energy from other non-renewable sources (Full production disclosure) increase the granularity of GOs by time and location while avoiding double counting. define GOs as being no greater than 1 MWh 	Support
63	Y	Art 1.1.5.d. iia (new)	Art 27.3.6	Peiper (EPP) (rapporteur)	Sets rules for counting electricity taken from the grid as fully renewable (replacing the RENBD derogated act) including by using a PPA or granular GOs	Support
163	Y	Rectal 13	N/A	Casares (S&D), Muñoz (S&D), López (S&D), Zorrinho (S&D), Hajšel (ind.), Fuglsang (S&D), Jerković (S&D), Sempere (S&D)	Allows MS to introduce guarantees of origin subject to additional size granularity.	Support
164	N	Rectal 13	N/A	Ninistö (Green)	Adds heating and cooling purchase agreements to rectal 13	Support
166	Y	Rectal 13 B (new)	Replacing rectal 59	Ninistö (Green)	Asks MS to expand the use of GOs to renewable heating and gives MS the option of expanding the use of GOs to non-renewable energy (the option of full production disclosure)	Support
270	N	Rectal 47 a (new)	N/A	Salini (EPP), De Mero (EPP), Caroppo (EPP), Patrikelo (EPP)	Extends the use of GOs to include low-carbon gas as well as all renewable energy carriers (already in RED-2) and allows MS to issue GOs to non-renewables (already in RED-2)	Support
362	N	Art 1.1.1.a (new)	Art 2	Peiper (EPP) (rapporteur) and others	Extends the definition of GOs to include low-carbon energy sources (a small step towards full production disclosure)	Support
670	N	Art 1.1.7.c (new)	Art 19.1	Salini (EPP), De Mero (EPP), Caroppo (EPP), Patrikelo (EPP)	Extends the use of GOs to include low-carbon gas as well as all renewable energy carriers (already in RED-2) and allows MS to issue GOs to non-renewables (already in RED-2)	Support
671	Y	Art 1.1.7.d (new)	Art 19.7	De Mero (EPP), Caroppo (EPP), Patrikelo (EPP)	Requires GOs to include information on the GHG footprint of the produced energy covering life cycle greenhouse gas emissions.	?
672	Y	Art 1.1.7.e (new)	Art 19.9	De Mero (EPP), Caroppo (EPP), Patrikelo (EPP)	Requires MS to recognise GOs from third countries (extended from only recognising from other MS)	?
673	Y	Art 1.1.7.f (new)	Art 19.11	Salini (EPP), De Mero (EPP), Caroppo (EPP), Patrikelo (EPP)	Requires the Commissions to issue guidelines clarifying the EU requirements for recognising guarantees of origin issued by a third country.	Support
676	Y	Art 1.1.8.a (new)	Art 19 (title)	Grudler (Renew), Garmon (Renew), Wiesner (Renew), Petersen (Renew), Danti (Renew), Grošelj (Renew), Hajoš (Renew), Pérez (Renew)	Re-titles article 19 to "GOs for energy" (removes "from renewable sources") (a step towards full disclosure)	Support

Amd #	Key Amd?	Amending C'ion proposal	Amending RED-2	MEP(s)	Objective (summarised) <i>Italic denote RECS commentary</i>	Support Oppose ? / N/A
677	Y	Art 1.1.8.a (new)	Art 19.1	Grudler (Renew), Garmon (Renew), Wiesner (Renew), Petersen (Renew), Danti (Renew), Grošelj (Renew), Hajoš (Renew), Pérez (Renew)	Expands the GO system to all energy (removes "from renewable sources") (a step towards full production disclosure)	Support
678	Y	Art 1.1.8.a (new)	Art 19.1	Bellamy (EPP), Bogovic (EPP), Castillo Vera (EPP)	Expands the GO system to all energy (removes "from renewable sources") (a step towards full disclosure)	Support
679	Y	Art 1.1.8.a.i	Art 19.2	Ninistö (Green)	Requires MS to allow for granular GOs on at least an hourly basis and for GOs of less than 1MWh	Support
680	Y	Art 1.1.8.a.i	Art 19.2	Grudler (Renew), Garmon (Renew), Wiesner (Renew), Petersen (Renew), Danti (Renew), Grošelj (Renew)	Expands the GO system to all energy (Full production disclosure) and Requires MS to allow for granular GOs on at least an hourly basis and for GOs of less than 1MWh	Support
681	Y	Art 1.1.8.a.i	Art 19.2.1	Rego (SUE/NGU)	Allows MS to decide to place additional or restrictive conditions for the issue of a guarantee of origin from an installation under public support, including not to issue such a GO. Also states that a GO shall be a maximum size of 1MWh (allows for granular GOs)	
683	Y	Art 1.1.8.a.i	Art 19.2	Glück (Renew), Grudler (Renew), Grošelj (Renew), Beer (Renew), Groothuis (Renew)	Re-introduces the option for MS not to issue such GOs to a producer that receives financial support from a support scheme	Oppose
684	Y	Art 1.1.8.a.i	Art 19.2	Tolénovský (ECR), Saryusz-Wolski (ECR), Toliszowski (ECR), Focchi (ECR), IGJE (ECR)	States that Member States may ensure that a GO is issued in response to a request from a producer of energy from renewable sources. Member States shall arrange for GOs to be issued for energy from non-renewable sources (if/for the current system)	Oppose
685	Y	Art 1.1.8.a.i	Art 19.2.1	Casares (S&D), Muñoz (S&D), López (S&D), Zorrinho (S&D), Hajšel (ind.), Fuglsang (S&D), Jerković (S&D), Sempere (S&D)	Removes the option for MS to issue GOs to energy from non-renewable sources. Also states that GOs must have a standard size of a maximum of 1MWh	Oppose
686	N	Art 1.1.8.a.i	Art 19.2.1	Glück (Renew), Grošelj (Renew), Beer (Renew), Groothuis (Renew)	Requires MS to issue GOs to producers of low carbon fuels (a step towards full disclosure)	Support
688	Y	Art 1.1.8.a.i	Art 19.2.5	Ninistö (Green)	Re-introduces the option for MS not to issue such GOs to a producer that receives financial support from a support scheme	Oppose
689	Y	Art 1.1.8.a.i (new)	Art 19.2.2	Bellamy (EPP), Bogovic (EPP), Castillo Vera (EPP)	Expands the GO system to all energy (removes "from renewable sources") (a step towards full disclosure)	Support
690	Y	Art 1.1.8.a.1b (new)	Art 19.2.4.c	Bellamy (EPP), Bogovic (EPP), Castillo Vera (EPP)	Expands the GO system to all energy (removes "from renewable sources") (a step towards full disclosure)	Support

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691	Y	Art 1.1.8.a.ii	N/A	Grudler (Renew), Garmon (Renew), Wiesner (Renew), Petersen (Renew), Danti (Renew), Grošelj (Renew), Hajoš (Renew), Pérez (Renew)	Expands the GO system to all energy	Support
692	Y	Art 1.1.8.a.ii	Art 19.2.5	Bellamy (EPP), Bogovic (EPP), Castillo Vera (EPP)	Expands the GO system to all energy	Support
693	Y	Art 1.1.8.a.a (new)	Art 19.7	Grudler (Renew), Garmon (Renew), Wiesner (Renew), Petersen (Renew), Danti (Renew), Grošelj (Renew), Hajoš (Renew)	Adds GHG footprint to GOs	Support
696	Y	Art 1.1.8.a.a (new)	Art 19.3	Bellamy (EPP), Bogovic (EPP), Castillo Vera (EPP), Kelly (EPP)	States that Guarantees of origin for electricity will be reduced to one month from 2025, one week from 2030 and one hour from 2035. (in the para on validity periods – not clear if this is the right place or if the amendment really makes sense here. The intention appears to be pushing for Granular GOs)	
697	Y	Art 1.1.8.a.a (new)	Art 19.3	Grudler (Renew), Garmon (Renew), Wiesner (Renew), Petersen (Renew), Danti (Renew), Grošelj (Renew), Hajoš (Renew), Pérez (Renew)	States that Guarantees of origin shall be valid for the time period of the production of the relevant energy unit took place, where the maximum time unit is one hour. (in the para on validity periods – not clear if this is the right place or if the amendment really makes sense here. The intention appears to be pushing for Granular GOs)	
702	N	Art 1.1.8.a.c (new)	Art 19.7.g	Bellamy (EPP), Bogovic (EPP), Castillo Vera (EPP), Carvalho (EPP), Kelly (EPP)	States that Life cycle GHG emissions data should be added to GOs	Support
703	Y	Art 1.1.8.a.d (new)	Art 19.12a (new)	Bellamy (EPP), Bogovic (EPP), Castillo Vera (EPP)	States that in the case of electricity, a Member State may not import or export more GOs with a third country than the reserved volume of its interconnection capacity with that third country.	
704	Y	Art 1.1.8.b	Art 19.8	Grudler (Renew), Garmon (Renew), Wiesner (Renew), Petersen (Renew), Danti (Renew), Grošelj (Renew), Pérez (Renew)	Expands the GO system to all energy (full supplier disclosure model)	Support
707	Y	Art 1.1.8.b.a (new)	Art 19.13a (new)	Casares (S&D), Muñoz (S&D), López (S&D), Zorrinho (S&D), Hajšel (ind.), Fuglsang (S&D), Jerković (S&D), Sempere (S&D)	Requires the Commission to assess, by 2025, necessary evolutions to the Guarantees of origin scheme towards finer timegranularity and location-based matching of consumption and propose, where appropriate, concrete measures that would enable their gradual implementation.	Support
709	Y	Art 1.1.8.a (new)	Art 19.6	Ninistö (Green)	Requires that the CEN standard be updated to explicitly facilitate guarantees of origin with a time attribute indicating the date and minute in which the associated renewable energy was produced.	Support
710	Y	Art 1.1.8.b (new)	Art 19.7.a (new)	Ninistö (Green)	Requires that GOs to include the start and end times to the nearest minute of energy production.	Support

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713	Y	Art 1.1.8.a (new)	Art 19.13	Ninistö (Green)	Requires the Commission to establish an EU wide green label	Oppose
714	Y	Art 1.1.8.f (new)	Art 19.13 (new)	Ninistö (Green)	Requires the Commission to monitor the functioning of the guarantee of origin system and assess by 2024 the balance of supply-demand of guarantees of origin in the market and in case of imbalances identify relevant factors affecting supply and demand and propose measures rectifying any potential structural imbalances with a view to support markets in focussing on new renewable installations.	Support
1070	N	Art 1.1.16.b	Art 27.1.c.ii	Virkkanen (EPP), Tófalvi (EPP)	Links GOs to counting renewable electricity in the transport sector	
1072	N	Art 1.1.16.b	Art 27.1.d	Karmoua-Nutri (S&D), Bengtqvist (S&D)	Links GOs to counting renewable electricity in the transport sector	
1237	Y	Art 1.1.20a (new)	Art 30.3	Salini (EPP), De Mero (EPP), Caroppo (EPP), Patrikelo (EPP)	Connects GOs to the requirements of new article 20a	Support
1241	Y	Art 1.1.22		Tolénovský (ECR), Saryusz-Wolski (ECR), Toliszowski (ECR), Focchi (ECR), IGJE (ECR)	Replaces the Union Database with an extended GO scheme	Support
1258	Y	Art 1.1.a (new)	Rectal 90	Wiesner (Renew), Grošelj (Renew), Glück (Renew), Beer (Renew)	Sets GOs as the core means of proving that electricity use to produce hydrogen is renewable	Support

European Parliament proposed amendments on Guarantees of Origin in the RED-3.

ITRE Ctte is leading the development of the Parliament's position for amending the RED-2. The political groups will try to develop compromise amendments that a majority can support. The ITRE Ctte will vote on its text on the 13th of July. The European Parliament will vote on its position on the 12th of September.

Overall, the amendments are positive, with steps towards more temporal granularity and expanding the GO scheme towards full disclosure. However, focus is more on production disclosure than consumption disclosure. There remains the challenge of the European Council, which tends to take a more conservative position.



Brussels, XXX
[...](2022) XXX draft

COMMISSION DELEGATED REGULATION (EU) .../...

of XXX

supplementing Directive (EU) 2018/2001 of the European Parliament and of the Council
by establishing a Union methodology setting out detailed rules for the production of
renewable liquid and gaseous transport fuels of non-biological origin

This draft has not been adopted or endorsed by the European Commission. Any views expressed are the preliminary views of the Commission services and may not in any circumstances be regarded as stating an official position of the Commission.

'BONUS' ITEM (1/2)

RED-2 IMPLEMENTATION

DELEGATED ACT ON COUNTING RENEWABLE ELECTRICITY IN THE PRODUCTION OF HYDROGEN AND RFNBOs

RECS' advocacy:

- Ensure the GO system forms the basis of any claims for using renewable electricity
- Ensure there is no risk of double counting of energy used for H2/RFNBO production

'BONUS' ITEM (2/2)

RED-2 IMPLEMENTATION

EUROPEAN STANDARD ON GUARANTEES OF ORIGIN (CEN EN 16325)

RECS' advocacy:

- Secure a standard that supports a harmonised, efficient and effective European GO system.
- Seek consensus among experts and national committees on points of contentions (Gases and GHG content)





QUESTIONS ?

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NEXT WEBINAR:

Supply and demand of certified
European renewable electricity
and selling EACs into Europe

Webinar for RECS members
21.06.2022

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