

Summary of the evaluation of national systems for guarantees of origin for electricity from renewable sources (GO) and for electricity labelling for the purpose of a decision on the recognition of imported guarantees of origin on behalf of the Federal Environment Agency (UBA)

Spain

Introduction

The German Federal Environment Agency (UBA) currently examines whether guarantees of origin for electricity from renewable sources (GO) from other Member States of the European Union and other states can in principle be recognised under Article 19 Directive (EU) 2018/2001 (RED II). The evaluation of the legal and practical implementation of the national systems for guarantees of origin and for electricity disclosure is supported by a consortium of external contractors (Öko-Institut e. V. and Becker Büttner Held PartGmbH (BBH)).

General

As of 7 November 2023, the assessment of the available information on system-related issues does not – in spite of some critical aspects – lead to general reasonable doubts about the reliability or veracity of GOs issued in and imported from Spain, so that, in accordance with Article 19 RED II, there currently appears to be no reason for not recognising such GOs.

Specifics

Spanish GOs fulfil (partly with restrictions) **all criteria according to Article 19 RED II**.

GOs are issued for the **standard size of 1 MWh** net electricity generation. In electricity disclosure, renewable sources are clearly distinguished from other electricity sources. **Electricity from renewable sources can be labeled in the electricity disclosure on the basis of the national residual mix or by using GOs**, which must be cancelled for this purpose.. With regard to the different applicable subsidy systems, it is ensured that **the value of any exportable GO has been sufficiently taken into account** in terms of the RED II.

The **residual mix calculations in Spain follow the method of the RE-DISS project** and, thus, avoid double counting.

GOs for renewable electricity generation from high-efficiency cogeneration can be issued either as **RES- GO or as HE-CHP-GO**. In any case it is safeguarded that only one GO is issued for a produced MWh of electricity.

GOs are not used to achieve the mandatory targets according to Article 3 RED II for renewable energy, nor do they affect the calculation of gross energy consumption.

GOs expire 12 months after the end of the month of generation or at the end of March of year X+1, whatever is earlier, unless the GOs are cancelled or exported before then.

The rules in force in Spain, and in particular the EECS Rules, which are applied, ensure **accurate, reliable and fraud-proof issuance, transfer and cancellation of GOs**. There is no indication that Statnett is in breach of these rules. In particular, it is ensured that GOs are used only once, and

that the registry technically avoids further use of the GO after cancellation, expiry or export of the GO.

The national Spanish regulatory authority CNMC is the **only body** in Spain responsible for issuing GOs. It is **independent of production, trade and supply**.

GOs are **issued for the net production of electricity** (excluding self-consumption) used by final consumers. The amount of net production is verified on the basis of **meter readings obtained from the grid operator**. The Spanish regulations contain provisions both for the correction of incorrect GOs and for incorrect or outdated registered data of generation plants.

Spanish GOs contain **all the information required by Article 19(7) RED II**.

Therefore, there are currently no reasonable doubts about the accuracy, reliability or veracity of the Spanish GOs in relation to system-related issues. Thus, Spanish GOs can usually be recognised.

Critical aspects

GOs for supported RES-E production can be issued also without comprehensive consideration of the amount of support for these production volumes. However, this can only apply for GOs which are not exported from Spain to Germany or other domains. For all GOs which are exported from Spain this requirement of Art 19 (2) is safeguarded.

For production stemming from renewable HE-CHP production, GOs can be issued either as RES GO or alternatively as HE-CHP GO. This is not fully in line with the requirement of Art. 19 (2) RED II that a combined RES-CHP GO has to be issued in this case. However, it is safeguarded that only one GO can be issued for any MWh produced, which sufficiently excludes the risk of double counting.

Reasons for non-recognition

None.

Note:

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