

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)

Greece

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 13 August 2024, the assessment of the available information on system-related issues does not lead to general reasonable doubts about the reliability or veracity of GOs issued in and imported from Greece, so that, in accordance with Art. 19 RED II, there currently appears no reason not to recognise Greek GOs.

Specifics

Greek GOs fulfil without restrictions **all criteria according to Art. 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 is only disclosed based on the GOs** which must be cancelled for this purpose.

For **financially supported electricity GOs are partly issued**, but they are either **directly cancelled** or the **market value of the GOs is considered** when defining the level of support. In the case of operating support for installations commissioned before 1 January 2021 the GOs are issued on a pro-rata basis directly to electricity consumers and are directly cancelled by the respective suppliers. In the case of operating support for installations commissioned after 1 January 2021 the GOs are auctioned to installation operators, whereby the market value of the GOs is considered. In the case of investment support, tradable GOs could be issued in addition to financial support. This might be critical with regard to Art. 19 (2) RED II, but in the view of the consortium it does not constitute a breach of the article.

In Greece, GOs are issued for renewable electricity generation from high-efficiency co-generation. In that case GOs must specify both features.

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

GOs lose – with view to the possible transfer – their validity 12 months after creation. Afterwards, they cannot be transferred or cancelled anymore.

DAPEEP, the supervisory body for the electricity market in Greece, is the only competent body for issuing GOs. It is a **state-owned company**, and independent of the generation, trading or supply of electricity.

The applicable rules in Greece ensure **accurate, reliable and fraud-proof issuance, transfer and cancellation of GOs.** There is no indication of a breach of these rules. The electronic register is connected to the AIB HUB and follows the EECS 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.

GOs are **issued for the net production of electricity** used by final consumers. Reliable measurement methods are used to delimit the quantities of electricity from different energy sources in complex situations (e.g. co-firing). The amount of net production is verified by the competent metering authority based on the meter readings carried out by (transmission) grid operators. The Greek regulations contain provisions for the correction of incorrect GOs, and the correction of incorrect or outdated registered data of generation plants.

Greek 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 Greek GOs** in relation to system-related issues. Thus, Greek GOs can generally be recognised.

Critical aspects

In Greece, GOs can be issued for electricity quantities for self-supply. These GOs are, however, cancelled directly after issuing and therefore cannot be transferred.

Reasons for non-recognition

None.

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