

| Country: Portugal  |  | Authors: REN (EEGO); ERSE (NRA)   |   |   |
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|                    |  | Actual implementation in the MS   | Comments  | Instructions for assessment/explanations  |
| Date: (2020/05/26) |  |   |   |   |
| <b>GENERAL</b>     |  |   |   |   |
| 1                  | Disclosure system implemented  | YES   |   | NO : No legislation and no system in place<br>Almost in line: have a legislation in place but does not consider all elements required by the directive e.g. no environmental legislation<br>YES : legislation in place + all elements disclosed |
| 2                  | - Legislation  | - The Directive nº16/2018 of 13 December 2018, published by the Portuguese National Regulatory Authority (NRA), ERSE - Energy Services Regulatory Authority, establishes the terms and conditions of electricity labelling and the rules for the disclosure of information on electricity sources to consumers.   | <a href="https://dre.pt/application/conteudo/117376527">https://dre.pt/application/conteudo/117376527</a>   | Please name the relevant regulations and provide an internet reference (preferably a version in English)  |
| 3                  | - When did the regulation(s) regarding disclosure come into force?                               | 1º version: 01/01/2012<br>Actual version: 01/01/2019  | The regulation was created in 2011 and amended in December 2018   | Please name the date in which the regulation(s) came into force.  |
| 4                  | - Competent Body (who is and since when?)  | ERSE- Entidade Reguladora dos Serviços Energéticos (National Regulatory Authority)  |   | Please specify and provide reference to legal nomination and the date since when the body was appointed   |
| 5                  | RE-GO system implemented   | YES   | REN is starting the activity gradually and the Registry System is already in operation  | NO : no secondary legislation and no system in place<br>Almost inline : secondary legislation in place but no registry<br>YES : Secondary legislation in place + registry   |
| 6                  | - Legislation  | -Decree-Law nº 141/2010 of 31 December 2010, amended by Decree-Law nº 39/2013, of 18 March 2013, by Decree-Law nº 68-A/2015 of 30 April 2015 and by Decree-Law nº 152-C/2017, of 11 December 2017 - establishing the mechanism of guarantees of origin for electricity generation, cooling or heating produced from renewable sources of energy.<br><br>- The current authorised Issuing Body for GOs was appointed under the Article nº 238 of Law nº 71/2018 of 31 December 2018. | <a href="https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html">https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html</a><br><a href="https://data.dre.pt/eli/dec-lei/68-a/2015/04/30/p/dre/pt/html">https://data.dre.pt/eli/dec-lei/68-a/2015/04/30/p/dre/pt/html</a><br><a href="https://data.dre.pt/eli/dec-lei/141/2010/12/31/p/dre/pt/html">https://data.dre.pt/eli/dec-lei/141/2010/12/31/p/dre/pt/html</a><br><a href="https://data.dre.pt/eli/dec-lei/39/2013/03/18/p/dre/pt/html">https://data.dre.pt/eli/dec-lei/39/2013/03/18/p/dre/pt/html</a><br><a href="https://data.dre.pt/eli/dec-lei/152-c/2017/12/11/p/dre/pt/html">https://data.dre.pt/eli/dec-lei/152-c/2017/12/11/p/dre/pt/html</a> | Please name the relevant regulations and provide an internet reference  |
| 7                  | - Competent Body (who is and since when?)  | REN-Rede Eléctrica Nacional, S.A. is the single electricity transmission system operator (TSO) in Portugal and was appointed, since January 2019, as the single Authorised Issuing Body and Registry Operator for Portugal, « <b>EEGO- Entidade Emissora de Garantias de Origem</b> », by Law nº 71/2018 of 31 December 2018  | <a href="https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html">https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html</a>   | Please specify and provide reference to legal nomination and the date since when the body was appointed   |
| 8                  | - Is the appointed Competent Body the only competent body in your domain for Gos (Who and When)? | YES   |   | Please specify  |
| 9                  | CHP-GO system implemented  | YES   | REN is starting the activity gradually and the Registry System is already in operation. Audits to production facilities are planned to start within 2 months  | NO : no secondary legislation and no system in place<br>Almost inline : secondary legislation in place but no registry<br>YES : Secondary legislation in place + registry   |

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| 10   | - Legislation  | - Decree-Law nº 23/2010 of 25 March 2010, amended by Law nº 19/2010 of 23 August 2010, and by Decree-Law nº 68-A/2015 of 30 April 2015 amended by Rectification Statement nº 30-A/2015 of 26 June 2015 - establishing the terms and conditions of the cogeneration activity.<br><br>- The current authorised Issuing Body for GOs was appointed under the Article nº 238 of Law nº 71/2018 of 31 December 2018. | <a href="https://data.dre.pt/eli/dec-lei/23/2010/03/25/p/dre/pt/html">https://data.dre.pt/eli/dec-lei/23/2010/03/25/p/dre/pt/html</a><br><a href="https://data.dre.pt/eli/dec-lei/68-a/2015/04/30/p/dre/pt/html">https://data.dre.pt/eli/dec-lei/68-a/2015/04/30/p/dre/pt/html</a><br><a href="https://data.dre.pt/eli/lei/19/2010/08/23/p/dre/pt/html">https://data.dre.pt/eli/lei/19/2010/08/23/p/dre/pt/html</a><br><a href="https://data.dre.pt/eli/dec-lei/30-a/2015/06/26/p/dre/pt/html">https://data.dre.pt/eli/dec-lei/30-a/2015/06/26/p/dre/pt/html</a><br><a href="https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html">https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html</a> | Please name the relevant regulations and provide an internet reference  |
| 11   | - Competent Body (who is and since when?)  | REN-Rede Eléctrica Nacional, S.A. is the single electricity transmission system operator (TSO) in Portugal and was appointed, since January 2019, as the single Authorised Issuing Body and Registry Operator for Portugal, «EEGO- Entidade Emissora de Garantias de Origem», by Law nº 71/2018 of 31 December 2018.  | REN was also the Competent Body Between 2011 and 2015 for CHP-GO<br><br><a href="https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html">https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html</a>   | Please specify and provide reference to legal nomination and the date since when the body was appointed   |
| 12   | - Is the appointed Competent Body the only competent body in your domain for Gos (Who and When)?   | YES   | <a href="https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html">https://data.dre.pt/eli/lei/71/2018/12/31/p/dre/pt/html</a>   | Please specify and provide reference to legal nomination and the date since when the body was appointed   |
| <b>ID Implementation of the elements of the Directive Related to GOs</b> |  |   |   |   |
| <b>Definition</b>  |  |   |   |   |
| 13   | The sole function of a GO is the usage for disclosure purposes for final customers.  | YES   |   | YES: in the Domain GO is defined as such (electronic energy certificate that meets the requirement of the RES Directive for RE-GO)<br>NO: in the Domain GO is not defined as such<br>NA: No RE-GO system in place |
| <b>Implementation of Article 15 of the Directive</b>                     |  |   |   |   |
| 14   | Have you fully implemented the requirements of Art. 15 of the RES-Directive?   | YES   |   |   |
| 15   | If not, please specify the ones which you have not implemented yet.  |   |   |   |
| <b>ID RE-DISS BPR</b>  |  |   |   |   |
| <b>12th Month Rule</b>   |  |   |   |   |
| 16   | Metered production periods for issuing GOs are not longer than a calendar month.   | YES   |   | NO : metered periods for issuing GOs are longer than a calendar year<br>YES : If true<br>Nota Bene : in case only RES GOs implemented only assess RES-GO system   |
| 17   | Metered production periods for issuing GOs do not run across the start and end of disclosure periods. Longer intervals up to one year are acceptable for very small plants, for example. | YES   |   | NO : Metered periods for issuing GO run across the start and end of disclosure periods.<br>YES : If true<br>Nota Bene : in case only RES GOs implemented only assess RES-GO system                                |
| 18   | If possible, issuing of GOs is done DIRECTLY after the end of each production period (potential exemption PV)  | YES   |   | NO : more than 6 months after the end of the production period<br>Almost in line : between 3 and 6 months after the PP<br>YES : within 3 months after the production period                                       |

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| 19                   | Lifetime of GO is limited to 12 months after the end of the production period.  | YES | The standard rule sets 12 months of validity; However, until december 2020, GO can be canceled up to 18 months after the end of the production period. During the last 6 months of this period, GOs should not be transferred. This transitional rule is already compliant with the new directive REDII. | NO : is not true<br>YES : is true<br>Nota Bene: in case only RES GOs implemented only assess RES-GO system<br><i>In the description section, please identify if this is true for other GO systems in place as well</i> |
| 20                   | GOs that have reached this lifetime (and haven't been used for disclosure) are collected into the Residual Mix  | NO  |  | NO : is not true<br>YES : is true<br>Nota Bene: in case only RES GOs implemented only assess RES-GO system<br><i>In the description section, please identify if this is true for other GO systems in place as well</i> |
| 21                   | Cancellations of GO relating to production periods in a given year X which take place until a given deadline in year X+1 count for disclosure in year X. Later cancellations count for disclosure in year X+1. (In case that disclosure periods differ from the calendar year, the deadline is defined accordingly.)  | YES | Electricity disclosure data is updated every quarter based on the data from the last 12 months. The deadline for cancelling GO for purposes of disclosure in a given period of 12 months is the end of the following month.  | Answer is YES or NO<br>Nota Bene : in case only RES GO is implemented only assess RES-GO system<br><i>Please provide details of the system in place in the Domain.</i>   |
| 22                   | Deadline is set on 31 March X+1   | NO  | Electricity disclosure data is updated every quarter based on the data from the last 12 months. The deadline for cancelling GO for purposes of disclosure in a given period of 12 months is the end of the following month.  | YES: Deadline is the stated one<br>NO: Different Deadline<br><i>If other, Please state the deadline in the description column.</i>   |
| 23                   | The same allocation rule applies for expired GO: The date of expiry thus determines the disclosure period for which information from expired GO will be used.   | YES |  | Answer is YES or NO"<br>Nota Bene : in case only RES GOs implemented only assess RES-GO system   |
| <b>Usage of EECS</b> |   |     |  |  |
| 24                   | The implementation of GO in all countries in Europe is based on the European Energy Certificate System (EECS) operated by the Association of Issuing Bodies (AIB). In case that national GO systems are established outside the EECS, then EECS is at least used for transfers between registries.  | YES |  | NO : transfers of GOs between registries are not done through EECS<br>YES : transfers of GOs between registries are done through EECS  |
| 25                   | Is the GO system in the country established exclusively according to EECS?  | YES |  | YES: If true<br>Almost in Line: both national GO and EECS system<br>NO: if not true  |
| 26                   | Does the domain utilise the AIB Hub for international transfers?  | YES |  | Yes: If true<br>Almost in Line: also use other systems for transfer of GO besides the AIB Hub<br>No: if not true   |
| 27                   | In case that not all European countries are members of EECS, appropriate connections between the EECS system and non-EECS members as well as between different non-EECS members are to be established. These include inter alia procedures for assessing the reliability and accuracy of the GO issued in a certain country and interfaces for the electronic transfer of GO. | YES |  | NO : no procedure to assess reliability and accuracy of GO<br>YES : procedures in place to assess reliability and accuracy of GO   |

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| 28   | Ex-domain cancellations of GO, where a GO is cancelled in one registry and a proof of cancellation is then transferred to another country in order to be used there for disclosure purposes, are only used if there is no possibility for a secure electronic transfer and if there is an agreement on such ex-domain cancellations between the competent bodies involved. Statistical information on all ex-domain cancellations are be made available in order to support Residual Mix calculations. | Almost in line |   | NO : none of the two statements are true<br>Almost in line : one of the statements is true<br>YES : Both statements are true<br>Nota Bene : in case only RES GOs implemented only assess RES-GO system |
| <b>Issuing of GOs for different energy sources and generation technologies</b> |  |                |   |  |
| 29   | GOs are issued only for the net generation of a power plant, i.e. gross generation minus the consumption of all auxiliaries related to the process of power production. For hydro power plants involving pumped storage this means that GOs are issued only for the net generation which can be attributed to natural inflow into the reservoir.   | YES            | When a device is out of service, its consumption is not counted   | NO : If not true<br>YES : If true  |
| 30   | Verification mechanisms are implemented for ongoing control of registered data (e.g.reaudits, random checks, etc.).  | YES            |   | NO : If not true<br>YES : If true  |
| 31   | Correct accounting of RES share of combustion plants is assured by adequate measures (EECS Rules)  | YES            | Except in the production of energy from municipal waste where 50% of the total nett electricity injected into the grid is considered for GO (renewable) | NO : If not true<br>YES : If true  |
| 32   | The competent body can correct errors in GOs it has issued before they are exported, and is the only one with this competence.   | YES            |   | NO : If not true<br>YES : If true  |
| 33   | The GO system is extended beyond RES & cogeneration to all types of electricity generation.  | NO             |   | NO : no extension<br>YES : extension in place  |
| 34   | GOs are issued for all electricity production, unless an RTS applies for that production, e.g. for the disclosure of supported electricity   | NO             |   | NO : If not true<br>YES : If true  |
| 35   | The Competent body has made the use of GOs mandatory for all electricity supplied to final consumers (full disclosure implemented).  | NO             |   | NO : If not true<br>YES : If true  |
| 36   | All types of GO are handled in one comprehensive registry system per country. (For an exception see the coexistence of national GO systems and EECS )  | YES            |   | Almost in line: if more than one registry, but closely coordinated<br>YES: one comprehensive registry<br>NO: Different registries  |
| 37   | Technical changes to plants are registered as soon as is reasonably practicable.   | YES            |   | NO : If not true<br>YES : If true  |
| 38   | GOs have no function in terms of target compliance and should not be used as support instrument. All GOs are linked to disclosure.   | YES            |   | YES : all GOs are linked to disclosure<br>Almost in line : if at least RES GO system is linked with disclosure, but others not clearly<br>NO : no GO system is linked to disclosure                    |
| 39   | A GO is considered as being used only once it has been electronically cancelled.   | YES            |   | NO : If not true<br>YES : If true  |

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| 40   | After cancellation, no further cancellation, transfer or export of the given GO is possible  | YES            |   | NO : If not true<br>YES : If true   |
| 41   | After expiry, no further cancellation, transfer or export of the given GO is possible  | YES            | The default rule sets a validity period of 12 months; However, until december 2020, GOs can be canceled up to 18 months after the end of the production period. Please note that after the 12 month validity period GOs shall not be transferred. This transitional rule is already compliant with the new directive REDII.                     | NO : If not true<br>YES : If true   |
| 42   | An exported GO is marked as removed from the exporting registry  | YES            |   | NO : If not true<br>YES : If true   |
| 43   | Processes in the registry excludes duplication of GOs.   | YES            |   | NO : If not true<br>YES : If true   |
| 44   | Registries are audited on a regular basis.   | YES            |   | NO : If not true<br>YES : If true   |
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| 45   | If multiple certificates are to be issued, e.g. a GO for disclosure and a support certificate for management of a support system, then these are legally separated.  | NA             |   | NO : not legally separated<br>YES : legally seperated<br>NA: no multiple certificates   |
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| 46   | This GO combines the functionalities of a RES-GO and a high efficiency cogeneration GO.  | YES            |   | NO : the GO does not combine both informations (lost of one information).<br>YES : the GO combines both RES and CHP in one GO                             |
| <b>GO as the unique "tracking certificate"</b>         |  |                |   |   |
| 47   | GO is the only "tracking certificate" used. Any other tracking systems of a similar purpose and function as GO are closely coordinated with GO and eventually converted to GO.   | Almost in Line | The labeling and disclosure regulation (Directive No. 16/2018 of 13 December 2018, published by the National Regulatory Authority) foresees (in addition to GOs) also a bilateral contract base tracking mechanism. This mechanism can be used only for the electricity not subject to GO therefore avoiding double counting of RES.            | YES : GO is the only tracking certificate<br>Almost in line : coordination between GO and other certificate<br>NO : no coordination between the 2 systems |
| 48   | Besides GO, only Reliable Tracking Systems (which may include contract based tracking) and the Residual Mix is available for usage for disclosure. No other tracking mechanisms are accepted.  | YES            |   | YES : GO + RM or GO + RM + RTS<br>NO : GO + other tracking system which is not a RTS + (RM)   |
| 49   | Green power quality labels use GO as the unique tracking mechanism.  | NA             |   | either YES or NO or NA if no green power label  |
| <b>Recognition of GO imported from other countries</b> |  |                |   |   |
| 50   | European countries choose one of the two following options and apply it consistently for all foreign GO :<br>- Rejection of GOs only relates to the cancellation of GOs and subsequent use for disclosure purposes in the respective country and does not restrict the transfers of GOs between the registry of the considered country and the registries of their countries. This means that the decision about the recognition of a GO does not hinder its import into the considered country.<br><br>- Rejection of GOs implies blocking their import to the national registry. | YES            | Option1: Although only renewable GOs are currently accepted for disclosure purposes, imports of non-renewable GOs will be accepted to the national registry. Import request will be rejected only if reasonable doubts arise regarding their accuracy, reliability or veracity. Rejection implies blocking the import to the national registry. | YES : If one of the options is applied<br>NO : If none of the options is applied<br>NA : no rejection of GO foreseen in the legislation                   |



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| 51  | The choice of one or the other option is transparent for all market parties and clearly communicated.   | YES            |  | YES : If true<br>NO : If not true<br>NA : no rejection of GO foreseen in the legislation   |
| 52  | Within the rules set by the respective Directives, European countries consider their criteria for the acceptance of imported GOs for purposes of disclosure.  | YES            | Although no formal criteria was already defined, transfer requests from other regions will not be accepted if reasonable doubts arise regarding their accuracy, reliability or veracity in compliance with Directive 2009/28/EC  | NO : no rejection criteria<br>YES : Rejection criteria have been listed<br>Almost in line : Rejection criteria being discussed   |
| 53  | These criteria address imports at least from all EU member states, other members of the European Economic Area (EEA) and Switzerland. The parties to the Energy Community Treaty are considered as well, as soon as GO imports from these countries become relevant.  | YES            | Although no formal criteria was already defined, transfer requests from other regions will not be accepted if reasonable doubts arise regarding their accuracy, reliability or veracity in compliance with Directive 2009/28/EC  | NO :criteria do not address imports of GO<br>YES :criteria address imports of GO   |
| 54  | The criteria specify the electronic interfaces, data format and contents of GOs to be imported, which the respective country accepts for imports of GOs (such as the EECS Hub).   | YES            | Yes, although no formal criteria have been already defined, imported GOs must comply with REN system and EECS rules.   | NO : criteria do not specify electronic interface, data format and contents of GO to be imported<br>YES :criteria do specify electronic interface, data format and contents of GO to be imported   |
| 55  | Conditions for the recognition of GOs from other countries are that they were issued based on Art. 15 of Directive 2009/28/EC or compatible national legislation, and that they meet the explicit requirements set in Art. 15, for example, regarding the information content of the GOs.   | YES            | Although no formal criteria was already defined, transfer requests from other regions will only be accepted if they are in full compliance with Directive 2009/28/EC and EECS rules.   | NO : If not true<br>YES : If true  |
| 56  | The recognition of GOs from other countries is rejected if these countries have not implemented an electricity disclosure system.   | NO             | Although no formal criteria was already defined, transfer requests from other regions will not be accepted if reasonable doubts arise regarding their accuracy, reliability or veracity in compliance with Directive 2009/28/EC  | NO : If not true<br>YES : If true  |
| 57  | The recognition of GOs from other countries is rejected if the country which has issued the GOs or the country which is exporting the GOs have not implemented appropriate measures which effectively avoid double counting of the attributes represented by the GOs. Such appropriate measures ensure the exclusivity of the GOs for representing the attributes of the underlying electricity generation, implement clear rules for disclosure, establish a proper Residual Mix or equivalent measures, and ensure their actual use. Furthermore, the appropriate measures ensure that attributes of exported GOs are subtracted from the Residual Mix of the | Almost in line | For EECS-GOs imports REN will assume that the measures mentioned exist and have been verified by AIB. For other operations, the acceptance criteria is not formally defined and REN will use its reasonable endeavours to verify GOs accuracy, reliability and veracity, in accordance with article 15(9) of EU Directive 2009/28/EC and the national legislation. | NO : If not true<br>YES : If true<br>Almost in line: if part of the measures are implemented   |
| <b>Disclosure Schemes and other Reliable Tracking Systems</b> |   |                |  |  |
| 58  | Full disclosure schemes are implemented, including the disclosure of CO <sub>2</sub> emissions and radioactive waste.   | Almost in line | A full disclosure system has not been implemented. Energy suppliers must publish in their bills and websites information about CO <sub>2</sub> emissions but information on nuclear waste is not currently being published   | YES or NO or Almost in line if only CO <sub>2</sub> or Nuclear waste or other restriction (e.g. only provided on website and not with bills and information material)<br><i>In the description column please specify:</i><br>- If the answer is almost in line, please describe the attribute that is missing (or any other restriction).<br>- Please insert the energy sources (fuels) that have to be distinguished.<br>- Also specify if certain attributes are allocated as "unknown" share in the fuel mix? |

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| 59                                    | RTS (Reliable Tracking Systems) can comprise, where applicable:<br>- Homogeneous disclosure mixes for regulated market segments where no choice of supplier or different products exists,<br>- Support systems whose interaction with disclosure requires a certain allocation of the attributes of supported generation (e.g. a pro-rata allocation to all consumers in a country where RES electricity is supported by a feed-in tariff),<br>- Contract based tracking | YES | The labeling and disclosure regulation (Directive No. 16/2018 of 13 December 2018, published by the National Regulatory Authority) foresees (in addition to GOs) also a bilateral contract base tracking mechanism. This mechanism can be used only for the electricity not subject to GO therefore avoiding double counting of RES.  | NA<br>YES : if true<br>Almost in line<br>NO is not allowed  |
| <b>Calculations of Residual Mixes</b> |  |     |   |   |
| 60                                    | Where a full-disclosure system has not been implemented in the country, the countries provide a Residual Mix (RM) as a default set of data for disclosure of energy volumes for which no attributes are available based on cancelled GO or based on other Reliable Tracking Systems. The use of uncorrected generation statistics (e.g. on national or UCTE, Nordel etc. levels) are avoided.  | YES |   | YES : proper RM calculation, or fully explicit tracking system applied based on GO and RTS<br>Almost in line : default set of data avoiding double counting of RES attributes; or fully explicit tracking system applies, but not fully based on GO and RTS<br>NO : No RM |
| 61                                    | The calculation of the Residual Mix follows the methodology developed in the RE-DISS project and taken over by the AIB.  | NO  | The residual national mix in Portugal, established under ERSE (NRA) Directive No. 16/2018, of 13 December 2018, reflects the composition of the national electrical generation mix, in which also considers the energy imports that came from the cross-border interconnections (from Spain) and take into account the executed bilateral contracts and the issuance of guarantees of origin by the national generation (by technology), in order to avoid double counting situations.  | YES : use of RE-DISS European Residual mix or of RE-DISS national RM<br>NO : no use of RE-DISS mixes  |
| 62                                    | The Competent body from my country cooperates with AIB in order to adjust the Residual Mix in reflection of cross-border transfers of physical energy, GO and RTS.   | NO  | The model in Portugal considers all the national relevant inputs, including the cross-border trading. In this case the residual national mix considers the national generation mix, the energy imports from the cross-border interconnections (from Spain), the amount of energy underlying physical bilateral contracts executed in Portugal and the amount of energy recognized by valid guarantees of origin issued in Portugal. Moreover, it is possible to import cancelled guarantees of origin from another member states foreseeing labelling purposes. So, in order to guarantee the disclosure of electricity consumption, the following tracking instruments may be used: cancelled national guarantees of origin, cancelled imported guarantees of origin and executed bilateral contracts. | YES : if true (including e.g. Data collection of RE-DISS)<br>NO : if not true   |
| 63                                    | For purposes of this cross-border adjustment, the competent body uses data provided by RE-DISS. The competent body also supports the collection of input data for the related calculations by the AIB (and it's consultant).   | NO  | As explained before, there is only a cross-border adjustment regarding to energy imports to the national generation mix. This adjustment corresponds to the pro-rata imputation of the Spanish generation mix to the interconnection between Portugal and Spain. For energy exports in the interconnection between Portugal and Spain, the balance is considered to be null (i.e. exporting cross-border energy balance does not change the national generation mix shares by technology).  | The focus is on the first part of the sentence<br>YES : use of AIB RM data (RE-DISS methodology)<br>Almost in line: use of EAM data (in case of deficit domains)<br>NO : no use of AIB data<br>NA : fully explicit disclosure system (without unknown shares)             |

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| 64   | As a default, the Residual Mix is calculated on a national level. However, in case that electricity markets of several countries are closely integrated (e.g. in the Nordic region), a regional approach to the Residual Mix may be taken. This should only be done after an agreement has been concluded amongst all countries in this region which ensures a coordinated usage of the regional Residual Mix.   | YES            |  | YES : coordinated regional approach or national approach<br>NO : uncoordinated regional approach or no RM<br>NA  |
| <b>Contract based tracking</b>               |  |                |  |  |
| 65   | If contract based tracking (CBT) is allowed in a country, it is regulated clearly and declared in the domain protocol.   | YES            | The labeling and disclosure regulation (Directive No. 16/2018 of 13 December 2018, published by the National Regulatory Authority) foresees (in addition to GOs) also a bilateral contract base tracking mechanism. This mechanism can be used only for the electricity not subject to GO therefore avoiding double counting of RES. | YES : true or CBT accepted<br>NO : not true<br>Almost in line : CBT exists and efforts have been made to regulate it<br>NA : CBT not allowed   |
| 66   | Such regulations ensure that<br>- The rules of the tracking system are transparent and comprehensive and are clearly understood by all participants in the system.<br>- Double counting of attributes and loss of disclosure information is minimised within the contract based tracking scheme and also in the interaction of the contract based tracking scheme to GO and other RTS (if applicable). As a precondition for this, the contract based tracking scheme is able to provide comprehensive statistics about the volumes and types of electricity attributes which are tracked through it.<br>- The relevant information for disclosure purposes is available in time to meet the timing requirements | YES            | The labeling and disclosure regulation (Directive No. 16/2018 of 13 December 2018, published by the National Regulatory Authority) foresees (in addition to GOs) also a bilateral contract base tracking mechanism. This mechanism can be used only for the electricity not subject to GO therefore avoiding double counting of RES. | YES : true<br>NO : not true<br>Almost in line : CBT exists and efforts have been made to regulate it<br>NA : when CBT is not allowed   |
| <b>Timing of Disclosure</b>                  |  |                |  |  |
| 67   | Electricity disclosure is based on calendar years.   | Almost in line | Electricity disclosure data is updated every quarter based on the data from the last 12 months   | YES or NO<br>Almost in line: if calendar year + another period can be chosen (ex. Financial year)<br><i>In the description column, if other period is used, please identify it: starting date-end date</i>   |
| 68   | The deadline for cancelling GO for purposes of disclosure in a given year X is 31 March of year X+1.   | NO             | The deadline for cancelling GO for purposes of disclosure in a given period of 12 months is the end of the following month.  | Yes: Deadline is the stated one<br>No: Different Deadline<br><i>If other, Please state the deadline in the description column.</i>   |
| <b>Further Recommendations on Disclosure</b> |  |                |  |  |
| 69   | The relation between support schemes for RES & cogeneration on the one side and GO and disclosure schemes on the other side are clarified. Where necessary, the support schemes should be defined as RTS   | YES            |  | YES : clear allocation of supported attributes<br>NO : no clear allocation of supported attributes<br>Almost in line : not allowed<br>NA : No legislation<br><i>In the description column please describe how supported energy is allocated to consumers in terms of disclosure.</i> |



|    |  |     |  |   |
|----|--|-----|--|---|
| 70 | If support schemes are using transferable certificates, then these certificates are separated from GO  | NA  |  | NO : not legally separated<br>YES : legally seperated<br>NA: no multiple certificates   |
| 71 | All electricity products offered by suppliers with claims regarding the origin of the energy (e.g. green or low-carbon power) are based exclusively on cancelled GO. No other tracking systems are allowed, with the exception of mechanisms defined by law, e.g. a pro-rata allocation of generation attributes to all consumers which is related to a support scheme.                          | YES | The labeling and disclosure regulation (Directive No. 16/2018 of 13 December 2018, published by the National Regulatory Authority) foresees (in addition to GOs) also a bilateral contract base tracking mechanism. This mechanism can be used only for the electricity not subject to GO therefore avoiding double counting of RES.   | YES : only GOs accepted for green products<br>NO : other TS accepted for green products<br>NA : no green products on the market<br>Almost in line : not allowed   |
| 72 | As required by Art. 3 (9) of the IEM Directive 2009/72/EC annual disclosure of the supplier mix on or with the bill is mandatory. This also includes information on environmental impacts.   | YES | The information about environmental impacts that is curently being published in the energy bills is CO2 emissions. Further information regarding environmental impacts should be published by the energy suppliers in their website and in a annual brochure updated annually (up to may X+1 information regarding year X is sent to customers) . Information on nuclear waste is not currently being published. | NO :annual disclosure of supplier mix is not mandatory on or with the energy bill and it does not include information on environmental parameters.<br>YES :annual disclosure of supplier mix is mandatory on or with the energy bill and it does include information on environmental parameters<br>Almost in line: annual disclosure of supplier mix is mandatory on or with the energy bill but it does not include information on environmental parameters<br>NA : no disclosure system in place |
| 73 | Suppliers offering two or more products which are differentiated regarding the origin of the energy are required to give product-related disclosure information to all their customers, including those which are buying the “default” remaining product of the supplier.  | YES |  | YES or NO<br>NA : no green products on the market<br>Almost in line : only product mix is disclosed, but not the (mandatory) supplier mix   |
| 74 | There are clear rules for the claims which suppliers of e.g. green power can make towards their consumers. There are rules on how the “additionality” of such products can be measured (the effect which the product has on actually reducing the environmental impact of power generation), and suppliers are required to provide to consumers the rating of each product based on these rules. | NO  | The information about environmental impacts that is curently being published in the energy bills is CO2 emissions. Further information regarding environmental impacts should be published by the energy suppliers in their website and in a annual brochure updated annually (up to may X+1 information regarding year X is sent to customers).Information on nuclear waste is not currently being published.   | YES : clear rules on green products<br>NO : no clear rules<br>NA : no green products on the market<br>Almost in line : not allowed  |
| 75 | Claims made by suppliers and consumers of green or other low-carbon energy relating to carbon emissions or carbon reductions are regulated clearly. These regulations avoid double counting of low-carbon energy in such claims. A decision is taken whether such claims should adequately reflect whether the energy purchased was “additional” or not.   | YES |  | YES : clear rules on green products<br>NO : no clear rules<br>NA : no green products on the market<br>Almost in line : not allowed  |
| 76 | In case that suppliers are serving final consumers in several countries rules are developed and implemented consistently in the countries involved on whether the company disclosure mix of these suppliers relates to all consumers or only to those in a single country.   | NA  |  | For most countries Not Known (NK) applies if information cannot be found<br>YES : clear rules on level of disclosure<br>NO : known practices of international disclosure by suppliers<br>Almost in line : some progress has been made<br>NA : not allowed   |
|    | <b>The following recommendations are followed with respect to the relation of disclosure to cooperation mechanisms (Art 6 - 11 of Directive 2009/28/EC):</b>   |     |  |   |

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| 77 | a) If EU MS or MS or any other country agree on Joint Projects, such agreements also clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the respective power plants | NA |  | YES: If agreements for Joint Projects clarify the allocation of attributes<br>NO: If the proposal is not true<br>NA: No joint projects        |
| 78 | b) If EU MS agree on Joint Support Schemes, such agreements clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the power plants supported under these schemes       | NA |  | YES: If agreements for Joint Support Schemes clarify the allocation of attributes<br>NO: If the proposal is not true<br>NA: No joint projects |

### Information on the Recognition of GO

| Extra questions on recognition of GO |  |     |   | Instructions for assessment/explanations  |
|--------------------------------------|--|-----|---|---|
| 79                                   | Does the Domain treat imported GO as national GO when it comes to disclosure? If so, please specify. | YES |   | NO: It treats imported GO differently from national issued GO in disclosure (for example: has criteria for accepting imported GO).<br>YES: treats them equally<br>"Almost in line" is not possible  |
| 80                                   | Does the Domain have criteria in place for accepting foreign GO for disclosure?                      | NO  | Import requests from other regions will not be accepted if reasonable doubts arise regarding their accuracy, reliability or veracity. For the time being, the recognition criteria for imported GOs is not formally defined yet but REN will use its best efforts to ensure full compliance with Art.15 of Directive 2009/28/EC | YES : criteria in place<br>NO : no criteria in place<br>"Almost in line" is not possible<br>NA : no rejection of GO foreseen in the legislation   |
| 81                                   | - If yes, please specify the criteria which are in place   |     | Import requests from other regions will not be accepted if reasonable doubts arise regarding their accuracy, reliability or veracity. For the time being, the recognition criteria for imported GOs is not formally defined yet but REN will use its best efforts to ensure full compliance with Art.15 of Directive 2009/28/EC | Please state which criteria of Art. 15 (6) RES Directive are implemented:<br>Electronic database in place<br>One competent body appointed by law<br>all GOs linked to disclosure<br>CO <sub>2</sub> emissions and radioactive waste included in disclosure display<br>transparent publication of disclosure information<br>others: please specify |
| 82                                   | Since when do you have these criteria in place?  |     |   | Please specify  |
| 83                                   | Are the criteria transparently published in your country?  |     |   | Please specify and indicate where those are published. If electronically please provide a link.   |

### Information on Environmental Parameters

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| 84 | What are the data basis for disclosing CO <sub>2</sub> emissions and radioactive waste when using GOs or other Reliable Tracking Systems for disclosing specific supplier mixes? | According to Article 8.º of NRA Directive nº16/2018, CO <sub>2</sub> emissions published by energy suppliers are calculated based on aggregated data published on the websites of the European Union Transaction (EUTL) and the National Inventory of Atmospheric Emissions (INERPA-Inventário Nacional de Emissões Atmosféricas). Information on nuclear waste is not currently being published. |  | Please describe how it is done in the Domain |
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### Information on Disclosure aspects

| Extra questions regarding the provision of disclosure information on a disclosure statement towards end consumers |  |  |  | Instructions for assessment/explanations |
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| 85 | Are there any regulations on graphical display of disclosure information by suppliers (requirements on how to display, fixed format of disclosure statement, ...) | YES | Information should be disclosed according to the colors, categories and types of diagrams established in Article 16.º of NRA Directive nº16/2018.  | <i>Pls. Provide short explanation plus reference to website/regulation.</i> |
| 86 | Is there a requirement to provide comparison values besides supplier- and product mix? If so, which one (e.g. national production mix)                            | NO  |  | <i>Pls. Provide short explanation plus reference to website/regulation.</i> |
| 87 | Is disclosure information somehow controlled by an official or independent institution? By whom? If so, is it audited or approved or calculated by that body?     | YES | ERSE (NRA) is responsible for the supervision of disclosure and the Residual Mix calculation   | <i>Pls. Provide short explanation plus reference to website/regulation.</i> |
| 88 | Is disclosure information of different suppliers centrally available (e.g. at the Competent Body, on a central website)?  | NO  | The disclosure information provided by different suppliers to ERSE (NRA) is not publicly available as reported. Nevertheless, ERSE will also foresee a national annual report to be publicly available under the Commercial Relationship Code on top of a labelling simulator developed by ERSE that will be available on the following public website (simulador.rotulagem.erse.pt) that can give a proxy to the disclosure information regarding electricity labelling by the suppliers. | <i>Pls. Provide short explanation plus reference to website/regulation.</i> |
| 89 | Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.     | NO  | Additional information about the environmental impacts associated to the production of the energy consumed is foreseen in Article 15.º of ERSE (NRA) Directive n.º 16/2018. In order to comply with this provision, ERSE (NRA) is responsible for defining and providing an indicative format for general information on environmental impacts for subsequent publication on each supplier's website and annual energy labelling leaflet.  | <i>Pls. Provide short explanation plus reference to website/regulation.</i> |
| 90 | Is there a specific regulation on disclosure of (high-efficient) CHP in your domain?  | NO  | High-efficient CHP GOs are immediately cancelled and therefore not available for trading   | <i>Pls. Provide short explanation plus reference to website/regulation.</i> |