

Country: Greece

Author: DAPEEP

		Actual implementation in the MS	Comments
<i>Date 2023</i>			
GENERAL			
	Disclosure system implemented	yes	<p>DAPEEP is appointed as the Competent Body for disclosure according to Law 4512/2018.</p> <p>Disclosure legislation entered into force in June 2018 with the Regulatory Authority Decision No.509/2018.</p> <p>Residual Energy Mix and Supplier's Energy Mix was first calculated in 2019 for the reference year 2018 following the transaction based methodology. Since 2020, the Issuance based methodology is followed for the calculations of the RM and SM for the reference year 2019 and on.</p> <p>The methodology has been approved by RAE's Decision No. E-47/2023.</p>

	<p><i>- Legislation</i></p>	<ul style="list-style-type: none"> - Law 3426/2005, Article 17 (Official Government Gazette B'309/22-12-2005) - Law No. 3468/2006 Article 15 (Official Government Gazette, First Bulletin, Sheet No.129, June 27, 2006 as revised by Law No 4951/2022, Official Government Gazette, First Bulletin, Sheet No.129, July 4,2022) - Law No 4001/2011, Article 48 (Official Government Gazette A'179/22-08-2011) - Supply Regulation, Article 13 (Official Government Gazette B'832/09.04.2013) - Law 4512/2018, Articles 97, 98 (Official Government Gazette A'5/17.01.2018) - Ministerial Decision No 81331/3661, Article 11 (Official Governmental Gazette second bulletin sheet number 4246, August 10, 2022) - RAE Decision No 509/2018 (Official Government Gazette B' 2307/18.06.2018) - RAE Decision No E-47/2023 	
	<p><i>- When did the regulation(s) regarding disclosure come into force?</i></p>	<p>The first regulation came into force in 2005. It was substantially amended in 2018 and 2022.</p>	
	<p><i>- Do you have an electronic system for GOs in place?</i></p>	<p>An electronic registry for issuing RES and HE-CHP Gos is operational since October 2010</p>	<p>A new registry has gone live since September 2023</p>

	- <i>Additional technical guidelines used in the MS (not mandatory)</i>		
	- <i>Competent Body (who is and since when?)</i>	The Competent Body is the Operator of RES & Guarantees of Origin (DAPEEP S.A., former LAGIE S.A.) since January 2018	<u>Law 4512/2018, Articles 97, 98 (Official Government Gazette A'5/17.01.2018)</u>
	RE-GO system implemented	Yes	
	- <i>Legislation</i>		<u>http://www.rae.gr/old/downloads/sub2/129%2827-6-06%29_3468.pdf</u> <u>http://www.ypeka.gr/LinkClick.aspx?fileticket=01P5rqu7YKw%3D&</u>
		- Law No 3468/2006 "Electricity Production from	

	<p>Renewable Energy Sources and High Efficiency Cogeneration of Electricity and Heat and other provisions”, Official Government Gazette, First Bulletin, Sheet No.129, June 27, 2006 as revised by Law No 4951/2022, Official Government Gazette, First Bulletin, Sheet No.129, July 4,2022</p> <p>- Ministerial Decision No 81331/3661 Official Governmental Gazette second bulletin sheet number 4246, August 10, 2022</p> <p>- RAE Decision No.410/2016, amendment of RAE Decision No.1599/2011 “Final approval of “Meters and measurement specification as required by Ministerial Decision 8786/2010, on ‘Implementing the System of Guarantee of Origin of Electricity from RES and HE-CHP systems and assurance mechanisms’” Official Government Gazette, Second Bulletin, Sheet No.4081, December 20, 2016</p>	<p>http://www.et.gr/idoocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wFHp_31M9ESQXdtvSoClrL8MAUNRyTXrMYtiDow6HTE-JlnJ48_97uHrMts-zFzeyCiBSQOpYnTy36MacmUFCx2ppFvBej56Mmc8Qdb8ZfRjgZnsIAdk8Lv_e6czmhEembNmZCMxLMtR NnnZizLhYoYlBO_nmpc3N288iqiGsu8gEJ3ZrrAxQU</p>
- <i>Competent Body (who is and since when?)</i>	<p>DAPEEP: Domain Greece</p> <p>GO System operational since October 2010</p>	
- <i>Is the appointed Competent Body the only competent body in your domain for Gos (Who and When)?</i>	<p>Yes</p>	
CHP-GO system implemented	<p>Yes</p>	

	<i>- Legislation</i>	<u>- Law 3734 (Government Gazette 8/28.01.2009)</u>	
		<u>Ministerial Decision Δ5- ΗΛ/Γ/Φ1/οικ.15606 (Government Gazette 1420/15.07.2009)</u>	
		<u>- Ministerial Decision Δ5- ΗΛ/Γ/Φ1/οικ.15641 (Government Gazette 1420/15.07.2009)</u>	
		<u>- Ministerial Decision Δ5-ΗΛ/Γ/Φ1/749 (Government Gazette 889/22.03.2012)</u>	
		<u>- Ministerial Decision Δ5- ΗΛ/Γ/Φ1/οικ.23278 (Government Gazette 3108/23.11.2012)</u>	
		<u>Law No.4342, Transposition of Directive 2012/27/EE (Official Government Gazette, First Bulletin, Sheet No.143, November 9, 2015)</u>	

	<p>- The Cogeneration Directive 2004/8/EC also provides for the use of guarantees of origin by energy suppliers as proof that electricity has been produced by high-efficiency cogeneration plants but, to avoid the possibility of double-counting, those issued to cogeneration plants consuming renewable energy may not be used to disclose as renewable the source of such energy.</p>		
	<p><i>- Is the appointed Competent Body the only competent body in your domain for Gos (Who and When)?</i></p>	<p>Yes</p>	
<p>Implementation of the elements of the Directive Related to GOs</p>			
<p>Definition</p>			
	<p>The sole function of a GO is the usage for disclosure purposes for final customers.</p>	<p>Yes</p>	<p>According to the provisions of Ministerial Decision ΥΠΕΝ / ΔΑΠΕΕΚ/81331/3661 Go should only be used for disclosure (article 2).</p>

Implementation of Article 15 of the Directive		
	<p>1. The country has a GO system implemented that ensures that the origin of electricity produced from RES can be guaranteed as such within the meaning of the RES Directive, in accordance with objective, transparent and non-discriminatory criteria</p>	<p>Yes</p>
	<p>2. A GO is issued in response to a request from a producer of electricity from RES</p>	<p>No</p> <p>automatically (no request needed) each month upon the availability of the respective measurement data and only for the registered production devices. Metering of Production output are provided by the Authorised Measurement Bodies. Issuance of EECS GOs is not automatically</p>
	<p>A GO is of the standard size of 1 MWh</p>	<p>Yes</p>

	<i>There is no issuing of more than one GO for the same unit of electricity.</i>	Yes	
	<i>MS ensures that the same unit of energy from RES is taken into account only once</i>	Yes	

	<p><i>The GO has no function in terms of a MS's compliance with Article 3. Transfers of GO, separately or together with the physical transfer of energy, shall have no effect on the decision of Member States to use statistical transfers, joint projects or joint support schemes for target compliance or on the calculation of the gross final consumption of energy from RES in accordance with Article 5.3.</i></p>		
		Yes	

3	<i>3. Any use of a GO takes place within 12 months of production of the corresponding energy unit.</i>	Yes	
	<i>A GO is cancelled once it has been used.</i>	Yes	
	<i>4. MS or designated competent bodies supervise the issuance, transfer and cancellation of GOs.</i>	Yes	

	<i>The designated competent bodies have non-overlapping geographical responsibilities, and be independent of production, trade and supply activities.</i>	Yes	
	<i>5. Member States or the designated competent bodies have put in place appropriate mechanisms to ensure that GO shall be issued, transferred and cancelled electronically</i>	Yes	

	<i>and are accurate, reliable and fraud-resistant.</i>		
		Yes	
	<i>6. A GO shall specify at least:</i>		
	<i>(a) the energy source from which the energy was produced</i>		
		Yes	
	<i>and the start and end dates of production;</i>		
		Yes	

	<i>(b) whether it relates to:</i>		
	<i>(i) electricity; or</i>	Yes	
	<i>(ii) heating or cooling;</i>	N/A	
	<i>(c) the identity, location, type and capacity of the installation where the energy was produced;</i>	Yes	
	<i>(d) whether and to what extent the installation has benefited from investment support, whether and to what extent the unit of energy has benefited in any other way from a national support scheme, and the type of support scheme;</i>	Yes	
	<i>(e) the date on which the installation became operational; and</i>	Yes	

	<i>(f) the date and country of issue and a unique identification number.</i>	Yes	
	<i>7. Where an electricity supplier is required to prove the share or quantity of energy from RES in its energy mix for the purposes of Article 3(6) of Directive 2003/54/EC, it may do so by using its GO.</i>	Yes	
	<i>8. The amount of energy from renewable sources corresponding to GO transferred by an electricity supplier to a third party shall be deducted from the share of energy from renewable sources in its energy mix for the purposes of Article 3(6) of Directive 2003/54/EC.</i>	Yes	

	<p>9. MS shall recognise GO issued by other MS in accordance to this Directive exclusively as proof of the elements referred to in paragraph 1 and paragraph 6(a) to (f). A MS may refuse to recognise a GO only when it has well-founded doubts about its accuracy, reliability or veracity. The MS shall notify the Commission of such a refusal and its justification.</p>	<p>Yes</p>	<p>GOs must be issued -By by an Issuing Body which is designated by an EU/EEA Member State or a third country that has concluded an agreement with the Union on mutual recognition of GOs -For for electricity produced from RES or high efficiency CHP Production Devices Their validity ceases after 12 months from the end of the production period they have been issued for. For EECs GOs issued for high efficiency CHP the additional information under E.7.2 a, b, c, e, f shall be registered in the GOs in order to be recognised.</p>
<p>Optional requisites included in the Directive</p>			
	<p>Besides issuing GOs for electricity produced from RES, MS arrange for GO to be issued in response to a request from producers of heating and cooling from RES</p>	<p>N/A</p>	

	<p><i>Such an arrangement may be made subject to a minimum capacity limit</i></p>	<p>N/A</p>	
	<p><i>Member States provide that no support be granted to a producer when that producer receives a GO for the same production of energy from RES.</i></p>	<p>yes</p>	<p>The EECS GO issued shall be registered in the EECS GO Account of the entity having the proprietary rights on the EECS GOs.</p> <p>a. Proprietary rights on the EECS GOs issued for a Production Device that is not financially supported for the electricity produced are given to the producer.</p> <p>b. Proprietary rights on the EECS GOs issued for a Production Device that is financially supported for the electricity produced and has been commissioned before 1.1.2021 are given to DAPEEP in order to allocate them proportionally to all end consumers through their supplier.</p> <p>c. Proprietary rights on the EECS GOs issued for a Production Device that is financially supported for the electricity produced and has been commissioned after 1.1.2021 are given to DAPEEP in order to auction them.</p>

	<p>11. MS introduces, in conformity with Community law, objective, transparent and non-discriminatory criteria for the use of GO in complying with the obligations laid down in Article 3(6) of Directive 2003/54/EC.</p>	<p>Described in articles 17 18 and 19 of "RES & Guarantees of Origin Operator's Code" as in force</p>	
	<p>Where energy suppliers market energy from RES to consumers with a reference to environmental or other benefits of energy from renewable sources, MS require those energy suppliers to make available, in summary form, information on the amount or share of energy from RES that comes from installations or increased capacity</p>	<p>No</p>	
<p>12th Month Rule</p>			

	<p>Metered production periods for issuing GOs are not longer than a calendar month.</p>	<p>yes</p>	<p>The period of time for which the EECS GOs are issued may not exceed one calendar month. Where the measurement period of the Production Device is more than one month then the EECS GOs will be issued for each month separately, based on a pro rata allocation per month of the Qualifying Output of that Production Device during each measuring period, as measured and validated by the competent Measurement Body.</p> <p>Especially for High Efficiency CHP Production Devices, the issue of EECS GOs of electricity produced may be requested for a period of one (1) year and must correspond precisely to the measurement period covered by metering data provided by the Authorised Measurement Bodies.</p>
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	<p>Metered production periods for issuing GOs run across the start and end of disclosure periods.</p> <p>Longer intervals up to one year are acceptable for very small plants, for example</p>	<p>YES</p>	
	<p>If possible, issuing of GOs should be done DIRECTLY after the end of each production period</p>	<p>YES</p>	<p>Issuing of EECS GO in respect of the Output of a Production Device is performed within 60 days after the month in which such Output was produced. The Issuing Body may extend the above deadline by one month</p>
	<p>Lifetime of GO is limited to 12 months after the end of the production period.</p>	<p>Yes</p>	
	<p>GOs that have reached this lifetime are collected into the Residual Mix</p>	<p>Yes</p>	

	<p>An extension to this lifetime can be granted if a GO could not be issued for more than [six] months after the end of the production period for reasons which were not fully under the control of the plant operator. In this case, the lifetime of the GO might be extended to [six] months after issuing the GO.</p>	No	
	<p>Cancellations of GO relating to production periods in a given year X which take place until a given deadline in year X+1 should 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 should be defined accordingly.)</p>	Yes	<p>Disclosure legislation entered into force in June 2018 with the Regulatory Authority Decision No.509/2018 and amended with Decision No. E-47/2023</p>

	Deadline is set on 31 March X+1	Yes	Disclosure legislation entered into force in June 2018 with the Regulatory Authority Decision No.509/2018 and amended with Decision No. E-47/2023
	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	Expired GOs are taken into account in the calculation of Residual Mix as the Issuance Based Methodology imposes
Usage of EECS			
	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	Yes	
	Is the GO system in the country established exclusively according to EECS?	Yes	Since September 2023
	Does the domain utilises the AIB Hub for international transfers?	Yes	Awaiting the Audit review of the Domain to be approved by the relevant AIB unit

	<p>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.</p>		
	<p>Market participants of the respective domain are provided the possibility to export their GOs and thus participate in the European internal market for electricity.</p>	No	Once the Audit review of the Domain is approved

	<p>So-called 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, should only be 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 should be made</p>	<p>Yes</p>	<p>We perform ex domain cancellations only upon signing a cancellation agreement with the Issuing Body of interest</p>
<p><i>Issuing of GOs for different energy sources and generation technologies</i></p>			
	<p>GOs are generally 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</p>	<p>Yes</p>	
	<p>Verification mechanisms are implemented for ongoing control of registered data (e.g. reaudits, random checks, etc.).</p>	<p>YES</p>	

	Correct accounting of RES share of combustion plants is assured by adequate measures such as those recommended by the EECS Rules (cf part N5.3.2).	YES	Article 8 of Ministerial Decision No 81331/3661 Official Governmental Gazette second bulletin sheet number 4246, August 10, 2022
	The competent body can correct errors in GOs it has issued before they are exported, and is the only one with this competence.	No	Once issued, the details of an EECS GO cannot be altered or deleted
	The GO system is extended beyond RES & cogeneration to all types of electricity generation.	No	
	GOs are issued for all electricity production, unless an RTS applies for that production, e.g. for the disclosure of supported electricity	Yes	No RTS exist in the Domain
	The Competent body has made the use of GOs mandatory for all electricity supplied to final consumers (full disclosure implemented).	No	

	<p>All types of GO are handled in one comprehensive registry system per country. (For an exception from this recommendation see the coexistence of national GO systems and EECS)</p>	<p>Yes</p>	<p>Only EECS GOs</p>
	<p>Technical changes to plants are registered as soon as is reasonably practicable.</p>	<p>Yes</p>	
	<p>GOs have no function in terms of target compliance and should not be used as support instrument. All GO are linked to disclosure.</p>	<p>Yes</p>	
	<p>A GO is considered as having been used only once it has been electronically cancelled.</p>	<p>Yes</p>	

	After cancellation, no further cancellation, transfer or export of the given GO is possible	Yes	
	After expiry, no further cancellation, transfer or export of the given GO is possible	Yes	
	An exported GO is marked as removed from the exporting registry	yes	
	Processes in the registry excludes duplication of GOs.	Yes	
	Registries are audited on a regular basis.	Yes	
	There is no issuing of more than one GO for the same unit of electricity. (this is from the Directive see paragraph 2 of the Directive)	Yes	

	<p>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.</p>	<p>N/A</p>	
	<p>This also applies to CHP plants which are using RES as the energy source: Only one GO is issued per unit of electricity</p>	<p>Yes</p>	
	<p>This GO combines the functionalities of a RES-GO and a high efficiency cogeneration GO.</p>	<p>No</p>	
	<p><u>GO as the unique "tracking certificate"</u></p>		
	<p>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.</p>	<p>Yes</p>	

	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	GO+RM
	Green power quality labels use GO as the unique tracking mechanism.	N/A	

	<p>European countries should clarify whether and under which conditions the use of GOs by end consumers is allowed. Such GO use is based on ex-domain cancellations performed in other countries. If consumers are allowed to use GOs themselves, a correction is implemented in the disclosure scheme which compensates for any “double disclosure” of energy consumed.</p>	<p>Yes.</p>	<p>Ex domain cancellation in an another EECS Registration Database for use in Greece is allowed only for EECS GOS that satisfy the criteria under ...E.8.6 and with beneficiary being a supplier of electricity in Greece for the purpose of proving the origin of electricity to the supplier’s customers. No ex-domain cancellation is allowed in favor of a Greek end consumer directly</p>
	<p><u>Recognition of GO imported from other countries</u></p>		

	<p>Any rejection only relates to the actual use of cancelled GO for disclosure purposes in the respective country and does not restrict the transfers of GO between the registries of different countries.</p>	NO	
	<p>European countries choose one of the two following options and apply it consistently for all foreign GO :</p> <ul style="list-style-type: none"> - Rejection of GOs only relates to the cancellation of GOs and subsequent use for disclosure purposes in the respective country and should 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 should not hinder its import into the considered country. 	Yes	Rejection of GOs implies blocking their import to the national registry.
	<p>The choice of one or the other option is transparent for all market parties and clearly communicated.</p>	Yes	

	<p>Within the rules set by the respective Directives, European countries consider their criteria for the acceptance of imported GOs for purposes of disclosure.</p>	<p>Yes</p>	<p>EECS GOs are allowed to be electronically imported to the EECS Registration Database of DAPEEP if they fulfil the following requirements:</p> <ul style="list-style-type: none">-They are issued by an Issuing Body which is designated by an EU/EEA Member State or a third country that has concluded an agreement with the Union on mutual recognition of GOs-They are issued for electricity produced from RES or high efficiency CHP Production Devices-The lifetime of 12 months has not been expired. <p>For EECS GOs issued for high efficiency CHP the additional information under E.7.2 a, b, c, e, f shall be registered in the GOs.</p>
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	<p>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.</p>	<p>Yes</p>	<p>GOs issued in Switzerland are restricted to imports</p>
	<p>The criteria specify the electronic interfaces, specifying data format and contents of GOs to be imported, which the respective country accepts for imports of GOs (such as the EECS Hub).</p>	<p>Yes</p>	<p>EN16325 / GOs issued in EU MS or third countries having concluded an agreement with the Union for mutual recognition of GOs / HEC GOs complying with Annex X 2012/27/EU</p>

	<p>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.</p>	Yes	In addition in case of GOs issued in a third country, an agreement with the Union for mutual recognition of GOs needs to be in place.
	<p>The recognition of GOs from other countries is rejected if these countries have not implemented an electricity disclosure system.</p>	Yes	

	<p>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.</p> <p>Furthermore, the appropriate measures ensure that attributes of exported GOs are subtracted from the Residual Mix of the exporting country and cannot be used for</p>	<p>Yes</p>	
<p><i>Disclosure Schemes and other Reliable Tracking</i></p>			

	Full disclosure scheme is implemented, including the disclosure of CO ₂ emissions and radioactive waste.	No	RES GOs, HEC GOs and RM are used for disclosure. Fuel Mix in RM follows fuel categories of EAM
	Other Reliable Tracking Systems (RTS) are used and defined based on criteria of added value, reliability and transparency	No	
	RTS can comprise, where applicable: - Homogeneous disclosure mixes for regulated market segments where no choice of supplier or different products exists, - 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	No	
Calculations of Residual Mixes			

	<p>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</p>	yes	
	<p>The calculation of the Residual Mix follows the methodology developed in the RE-DISS project and taken over by the AIB.</p>	Yes	Issuance Based Methodology
	<p>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.</p>	yes	

	<p>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 its consultant).</p>	Almost in line	
	<p>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 is only done after an agreement has been concluded amongst all countries in this region which ensures a coordinated usage of the regional Residual Mix.</p>	No	Uncoordinated regional approach

Contract based tracking			
	If contract based tracking is allowed in a country, it is regulated clearly.	NA	
	Such regulations ensure that - The rules of the tracking system are transparent and comprehensive and are clearly understood by all participants in the system. - 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.	NA	

	<p>In cases that suppliers of electricity intend to use contract based tracking in order to fulfill claims made towards consumers regarding the origin of a certain electricity product (e.g. a green energy product), GOs are used instead of contract based tracking.</p>	NA	
	<p>A system where generation attributes are allocated to suppliers and consumers of electricity “ex post” based on the contracts concluded in the electricity market is implemented. Such a system fulfills the requirements mentioned above in order to qualify as a Reliable Tracking System</p>	No	
Timing of Disclosure			

	Electricity disclosure is based on calendar years.	yes	
	The deadline for cancelling GO for purposes of disclosure in a given year X is 31 March of year X+1.	Yes	
	<p>The timing of the calculation of the Residual Mix should be coordinated across Europe:</p> <ul style="list-style-type: none"> - By 30 April X+1 all countries should determine their preliminary domestic Residual Mix and whether they have a surplus or deficit of attributes. - By 15 May X+1, the European Attribute Mix should be determined. - By 31 May X+1, the final national Residual Mixes should be published. - As of 1 July X+1 the disclosure figures relating to year X can be published by suppliers 	Almost in line	The final national RM should be published by 30 June X+1.
Further Recommendations on Disclosure			

	<p>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</p>		
	<p>If support schemes are using transferable certificates, then these certificates are generated from GO</p>	yes	NA

	<p>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</p>		
	<p>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.</p>	yes	

	<p>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.</p>	Yes	
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	<p>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.</p>	No	
	<p>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 being taken whether such claims should adequately reflect whether the energy</p>	no	

	<p>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</p>	<p>Not known</p>	
	<p>The following recommendations are followed with respect to the relation of disclosure to cooperation mechanisms (Art 6 - 11 of Directive 1009/28/EC):</p>		
	<p>a) If EU MS or MS or any other country agree on Joint Projects, such agreements should also clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the respective power plants</p>	<p>na</p>	

<p>b) If EU MS agree on Joint Support Schemes, such agreements should also clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the power plants supported under these schemes</p>	<p>na</p>	
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Information for the calculation of the Disclosure Errors

<p>Please provide extra information on the calculation methodology if AIB data is not used. Especially relating to:</p>		
<p>Calculation formulae</p>	<p>Issuance Based Method</p>	
<p>Time frame of GO transactions considered in the residual mix.</p>	<p>01/04/year X to 31/03/year X+1</p>	

<p>Are transactions considered only for GOs relating to production periods within the year for which the residual mix is calculated? (e.g. when calculating 2015 RM only GOs relating to production year 2015 are considered)</p>	<p>No</p>	
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Information on the Recognition of GO

	Extra questions on recognition of GO	Describe the actual implementation in the MS	Problems/Shortfalls/Internal Comments
	<p><i>Does the Domain treat imported GO as national GO when it comes to disclosure? If so, please specify.</i></p>	<p>No</p>	<p>There are criteria for import; once imported they are treated equally.</p>
	<p><i>Does the Domain have criteria in place for accepting foreign GO for disclosure?</i></p>	<p>Yes</p>	

<p><i>- If yes, please specify the criteria which are in place</i></p>	<p><i>Electronic database in place One competent body appointed by law all GOs linked to disclosure disclosure mechanism in force Domain belongs to an EU MS/EEA or a third country having concluded agreement with EU for mutual recognition of GOs</i></p>	
<p><i>Since when do you have these criteria in place?</i></p>	<p>August 2022</p>	
<p><i>Are the criteria transparently published in your country?</i></p>	<p>No</p>	

Information on Environmental Parameters

<p>What is the data basis for disclosing CO₂ emissions and radioactive waste when using GOs or other Reliable Tracking Systems for disclosing specific supplier mixes?</p>		<p>Data of domestic CO₂ emissions are provided by the Competent Office of Ministry for Energy and the Environment. No domestic nuclear power production exists. Radioactive waste data is collected through the European Attribute Mix. CO₂ emissions or nuclear waste linked to electricity imported from interconnected third countries (Turkey, Albania and North Macedonia) are provided by Ecoinvent.</p>
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Information on Disclosure aspects

Extra questions regarding the provision of disclosure information on a disclosure statement towards end consumers	Describe the actual implementation in the MS	Problems/Shortfalls/Internal Comments
Are there any regulations on graphical display of disclosure information by suppliers (requirements on how to display, fix format of disclosure statement, ...)	no	
Is there a requirement to provide comparison values besides supplier- and product mix? If so, which one (e.g. national production mix)	no	

<p>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?</p>	<p>yes</p>	<p>DAPEEP according to Law 4512/2018</p>
<p>Is disclosure information of different suppliers centrally available (e.g. at the Competent Body, on a central website)?</p>	<p>yes</p>	<p>https://www.dapeep.gr/viosimi-anaptixi/energeiako-meigma/</p>
<p>Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.</p>	<p>No</p>	
<p>Is there a specific regulation on disclosure of (high-efficient) CHP in your domain?</p>	<p>Yes</p>	<p>Electricity produced by HE CHP units using fossil fuel is explicitly referenced in the energy mix</p>

Instructions for assessment/explanations

NO : No legislation and no system in place
Almost in line: have a legislation in place but does not consider all elements required by the directive e.g. no environmental legislation
YES : legislation in place + all elements disclosed

Please name the relevant regulations and provide an internet reference (preferably a version in English)

Please name the date in which the regulation(s) came into force.

Please specify

Please name the relevant documents, the author of the document (regulator, industry of x, for example) and provide an internet reference

Please specify and provide reference to legal nomination and the date since when the body was appointed

NO : no secondary legislation and no system in place
Almost inline : secondary legislation in place but no registry
YES : Secondary legislation in place + registry

Please name the relevant regulations and provide an internet reference

*Please specify and provide reference to legal nomination
and the date since when the body was appointed*

Please specify

NO : no secondary legislation and no system in place
Almost inline : secondary legislation in place but no
registry
YES : Secondary legislation in place + registry

Please name the relevant regulations and provide an internet reference

YES: there is a system in place that details an electronic energy certificate that meets the requirements of the Directive for cogeneration guarantees of origin (CHP GOs), clearly identifying their intended usage as being limited to disclosure of energy produced by cogeneration plants.

NO: There is not a system for CHP-GO

Please specify and provide reference to legal nomination and the date since when the body was appointed

YES: in the Domain GO is defined as such (electronic energy certificate that meets the requirement of the RES Directive for RE-GO)

NO: in the Domain GO is not defined as such

NA: No RE-GO system in place

YES: The emphasis is on the first part of the sentence. If the Domain has a system of transferable electronic certificates which complies with the definition of RES GOs provided in the RES Directive.

Almost in line: there is a legal system implemented but it is not fully working (or it is legally created but not in operation)

NO: if the domain does not have a system in place of transferable electronic certificates which comply with the definition of RES GO according to the RES Directive.

NA: If the domain does not have a RES-GO system

YES: the Domain has a system that allows GOs to be issued in response to a request from a producer of renewable energy.

NO: The Domain does not have a procedure stating that a GO is issued upon the request from a producer of electricity from RES

YES: The GO is of standard size of 1 MWh. If issued under EECS than the answer is Yes.

NO: the GO is issued for a different unit size of electricity produced from RES.

Almost in line: Issued in the national system under any other unit, but transferred (exported) under 1 MWh

NA: there is no GO system in place.

YES: if the system in place only allows the issuance of a unique GO for a given unit of electricity produced.

NO: if more than one GO can be issued for the same unit of electricity

NA: No GO system in place

YES: Domains should ensure that GO + RTS + residual mix+ clarification of link of GOs with support schemes is taken into consideration and is not double counted in different systems for electricity disclosure.

NO: if there is double counting of attributes.

NA: RES- GO system not in place

YES: GOs shall only have the function of being used for disclosure.. (verify in legislation)

NO: GOs are used for other functions besides disclosure.

NA: There is no GO system in place.

Definitions of "USE" may vary in the domain as the Directive does not define it clearly. Thus the answer should be:

YES: If the system in place provides expiry of the GO after a period of time defined by the Domain in whose registry they resign.

NO: if the system does not conform to the above.

NA: If there is no GO system in place.

The descriptions should at least specify:

- Meaning of "use" (cancellation & transfer, application to a disclosure period, ...?)

- reference start time life time of the GO (e.g. end of production period)

- extent of the lifetime period of a GO (usually 12 months)

- possible fix settlement dates (e.g. 31. March X+1)

YES: if in the system in place the GO is cancelled after it has been used for disclosure.

NO: if in the system in place the GO is not cancelled after being used for disclosure.

NA: if there is no GO system in place.

YES: the system in place in the domain has a Competent Body legally assigned for the issuance, transfer and cancellation of GO and the name of the competent body appears on the GO.

NO: the domain has a RES-GO system in place but no competent body assigned.

NA: the Domain does not have a RES-GO system in place.

YES: the competent body of the Domain conform to this.

NO: If the above is not true

NA: there is no RES-GO system in place.

YES: The domain has a legislation that puts in place the appropriate mechanisms to ensure that a GO is issued, transferred and cancelled electronically.

NO: the system in place does not conform to the above.

NA: there is no RES-GO system in place

YES: The domain has a legislation that puts in place a GO that is reliable and fraud-resistant.

Almost in line: if some of the criteria are used (see the criteria below).

NO: the system in place does not conform to the above.

NA: there is no RES-GO system in place

The system is reliable and fraud resistant if the following criterias are observed:

- *GO is issued based on actual meter readings*
- *GO is only issued for RES-E which is then used by end-consumers (i.e. no pumped hydro)*
- *There are mechanisms implemented for ongoing control of registered data (e.g. re-audits, random checks, ...)*
- *RES share of combustion plants is assured by adequate measures*
- *IB can correct errors in issued GOs*
- *technical changes to plants are registered in the short term*

(please indicate in the description column the criteria that the system respects)

YES: if the GO specifies the energy source from which the electricity was produced.

NO: if it does not specify the energy source.

NA: No RES-GO system in place

Description should include the fuel categories which are used, or at least a reference.

YES: If the GO specified the start and end dates of production.

NO: If it does not specify

NA: if no RES-GO system is in place.

YES: If the GO specified that relates to electricity. NO: If it does not specify NA: if no RES-GO system is in place.
YES: If the GO specified that relates to heating and cooling. NO: If it does not specify NA: if no H/C-GO system is in place.
YES: If the GO specifies the identity, location, type and capacity of the installation where the electricity is produced. NO: If it does not specify NA: if no RES-GO system is in place.
YES: If the GO specifies whether and to what extent the installation has benefited from investment support, whether and to what extent the unit of energy has benefited in any other way from a national support scheme, and the type of support scheme. NO: If it does not specify NA: if no RES-GO system is in place. <i>Description should ideally include a description on how "extent of support" is interpreted (at least for non-EECS domains)</i>
YES: If the GO specifies the date on which the installation became operational. NO: If it does not specify NA: if no RES-GO system is in place.

YES: If the GO specifies the date and country of issue and a unique identification number.

NO: If it does not specify

NA: if no RES-GO system is in place.

YES: the domain uses GO.

NO: the domain does not use GO

Domain description should specify whether GO use is mandatory for RES, explicitly allowed or simply not excluded.

YES: if the domain does have a procedure for deducting the transferred GO from the energy mix (if the Domain uses of residual mix the answer is Yes).

NO: if the domain does not have a procedure for deducting the transferred GO from the energy mix.

NA: If the domain does not have a RES-GO system in place

YES: If the Domain has in place a procedure to recognise
GO from other client (criteria of mutual recognition)
NO: If the domain does not have a procedure for that.
NA: if the domain does not have a RES-GO system in place

YES: if the Domain issues GO to H/C producers
NO: If the Domain has a H/C-GO system in place but does
not issue GOs upon request from the producers
NA: If the Domain does not have a H/C-GO system in place

YES: if the Domain has H/C - GO system in place and has minimum capacity limit for issuing GOs

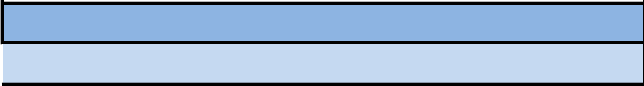
NA: No H/C GO system in place

If yes please indicate in the description the limit established.

Please describe how MS deal with this.

If the domain has this, please describe how it is actually implemented.

If the domain has this, please describe how it is actually implemented.



NO : metered periods for issuing GOs are longer than a calendar year

YES : If true

NA: No GO system in place

Nota Bene : in case only RES GOs implemented only assess RES-GO system

NO : Metered periods for issuing GO run across the start and end of disclosure periods.
YES : If true
NA: No GO system in place
Nota Bene : in case only RES GOs implemented only assess RES-GO system

NO : more than 6 months after the end of the production period
Almost in line : between 3 and 6 months after the PP
YES : within 3 months after the production period
NA : no GO system in place

NO : not true
YES : true
NA: No GO system in place
Nota Bene: in case only RES GOs implemented only assess RES-GO system
In the description section, please identify if this is true for other GO systems in place as well

NO : not true
YES : true
NA: No GO system in place
Nota Bene: in case only RES GOs implemented only assess RES-GO system
In the description section, please identify if this is true for other GO systems in place as well

NO : no such provision foreseen in secondary legislation or regulation

Almost in line : common practice but no legislative provision in place

YES : provision in place

NA: NO GO system in place

Answer is YES or NO

"Almost in line" should not be used

Nota Bene : in case only RES GO is implemented only assess RES-GO system

NA: No GO system in place

Please provide details of the system in place in the Domain.

YES: Deadline is the stated one
NO: Different Deadline
If other, Please state the deadline in the description column.

"Almost in line" should not be used
Nota Bene : in case only RES GOs implemented only assess RES-GO system
NA: NO GO system in place

NO : transfers of GOs between registries should not be done through EECS
YES : transfers of GOs between registries should be done through EECS
NA : No GO system in place

YES: If the proposal is true
Almost in Line: both national GO and EECS system
NO: if the proposal is not true

Yes: If true
Almost in Line: also use other systems for transfer of GO besides the AIB Hub
No: if not true

NO : no procedure to assess reliability and accuracy of GO

YES : procedures in place to assess reliability and accuracy of GO

NA: No GO system in place

NO : Market participants dont have the posibility for exporting GO and thus cannot participate in the EU internal market of electricity

YES : Market participants have the posibility for exporting GO and thus can participate in the EU internal market of electricity

NA: No GO system in place

NO : none of the two proposals are true
Almost in line : one of the proposals is true
YES : Both proposals are true
NA: No GO system in place
Nota Bene : in case only RES GOs implemented only assess
RES-GO system

NO : If not true
YES : If true
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

NO : no extension
YES : extension planned or in place
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

Almost in line: if more than one registry, but closely coordinated

YES: one comprehensive registry

NO: Different registries

NO : If not true

YES : If true

YES : all GOs are linked to disclosure

Almost in line : if at least RES GO system is linked with disclosure, but others not clearly

NO : no GO system is linked to disclosure

NO : If not true

YES : If true

NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

NO : If not true
YES : If true
NA : no GO system in place

YES: if the system in place only allows the issuance of unique GO for a given unit of electricity produced. If the system is EECS then the answer is Yes.
NO: if more than one GO can be issued for the same unit of electricity
NA: No GO system in place

NO : not legally separated
YES : legally separated
NA: no multiple certificates

YES: if the system in place only allows the issuance of unique GO for a given unit of electricity produced. If the system is EECS than the answer is Yes.
NO: if more than one GO can be issued for the same unit of electricity
NA: No GO system in place

NO : the GO does not combine both informations (lost of one information).
YES : the GO combines both RES and CHP in one GO
NA: No GO system in place

YES : GO is the only tracking certificate
Almost in line : coordination between GO and other certificate
NO : no coordination between the 2 systems
NA : No GO system in place

YES : GO + RM or GO + RM + RTS

NO : GO + other tracking system which is not a RTS + (RM)

NA : no GO system in place

eihter YES or NO or NA if no green power label or no GO system

Almost in line should not be used

YES: clear regulation (pls. Specify)

NO: no clear regulation

YES : rejection does not prevent import
NO : rejection prevents import
NA : no rejection of GO foreseen in the legislation

YES : If one of the options is applied
NO : If none of the options is applied
NA : no rejection of GO foreseen in the legislation

YES : If true
NO : If not true
NA : no rejection of GO foreseen in the legislation

NO : no rejection criteria

YES : Rejection criteria have been listed

Almost in line : Rejection criteria being discussed

NO :criteria do not address imports of GO

YES : criteria address imports of GO

NA : no GO system in place

NO :criteria do not specify electronic interfaces, data format and contents of GO to be imported

YES :criteria do specify electronic interfaces, data format and contents of GO to be imported

NA : no GO system in place

NO : If not true

YES : If true

NA : no GO system in place

NO : If not true

YES : If true

NA : no GO system in place

NO : If not true

YES : If true

Almost in line: if part of the measures are implemented

NA : no GO system in place



YES or NO or Almost in line if only CO₂ or Nuclear waste or other restriction (e.g. only provided on website and not with bills and information material)

In the description column please specify:

- If the answer is almost in line, please describe the attribute that is missing (or any other restriction).

- Please insert the energy sources (fuels) that have to be distinguished.

- Also specify if certain attributes are allocated as "unknown" share in the fuel mix?

YES: if either RTS are appropriately defined or if no RTS is accepted for the supplier mix

NO : RTS are not appropriately defined (i.e., not all possible tracking systems are unreliable)

NA

YES

Almost in line

NO is not allowed

YES : proper RM calculation, or fully explicit tracking system applied based on GO and RTS

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

NO : No RM

NA : no disclosure system in place

If something else than YES, Please elaborate: Are uncorrected generation statistics used? If so, of the country or UCTE? Explain as well how they are used.

YES : use of RE-DISS European Residual mix or of RE-DISS national RM

NO : no use of RE-DISS mixes

If something else than YES, please elaborate. Is the country calculating the residual mix only internally? (Are missing attributes disclosed as unknown or is the mix expanded?)

YES : if the proposal is true (including e.g. Data collection of AIB)

NO : if the proposal is not true

If something else than YES, please elaborate. Is the country calculating the residual mix only internally? (Are missing attributes disclosed as unknown or is the mix expanded?)

The focus is on the first part of the sentence

YES : use of AIB RM data

Almost in line: use of EAM data (in case of deficit domains)

NO : no use of AIB data

NA : fully explicit disclosure system (without unknown shares)

If something else than YES, please elaborate. Is the country calculating the residual mix only internally? (Are missing attributes disclosed as unknown or is the mix expanded?)

YES : coordinated regional approach or national approach

NO : uncoordinated regional approach or no RM

If something else than YES, please elaborate: Is the residual mix calculated for an area which is something else than the country?

YES : true or CBT accepted

NO : not true

Almost in line : CBT exists and efforts have been made to regulate it

NA: CBT not allowed

YES : true

NO : not true

Almost in line : CBT exists and efforts have been made to regulate it

NA : when CBT is not allowed

YES : true
NO : not true
NA : when CBT is not allowed

YES : true or CBT not accepted
NO : not true
Almost in line : CBT ex post exists and efforts have been made to regulate it



YES or NO

Almost in line: if calendar year + another period can be chosen

In the description column, if other period is used, please identify it: starting date-end date

Yes: Deadline is the stated one

No: Different Deadline

If other, Please state the deadline in the description column.

YES: if true

Almost in line : First 3 deadlines are met but disclosure figures are published on a different date (from 31st May or later)

NO: if proposal not true or no RM calculation

YES : clear allocation of supported attributes

NO : no clear allocation of supported attributes

NA : No GO legislation

In the description column please describe how supported energy is allocated to consumers in terms of disclosure.

NO : not legally separated

YES : legally seperated

NA: no multiple certifcates

YES : only GOs accepted for green products

NO : other TS accepted for green products

NA : no green products on the market

NO :annual disclosure of supplier mix is not mandatory on or with the energy bill and it does not include information on environmental parameters.

YES ::annual disclosure of supplier mix is mandatory on or with the energy bill and it does include information on environmental parameters

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

NA : no disclosure system in place

YES or NO

NA : no green products on the market

Almost in line : only product mix is disclosed, but not the
(mandatory) supplier mix

YES : clear rules on green products

NO : no clear rules

NA : no green products on the market

YES : clear rules on green products

NO : no clear rules

NA : no green products on the market

Not Known (NK) applies if information cannot be found

YES : clear rules on level of disclosure

NO : known practices of international disclosure by suppliers

Almost in line : some progress has been made

YES: If agreements for Joint Projects clarify the allocation of attributes

NO: If the proposal is not true

NA: No joint projects

YES: If agreements for Joint Support Schemes clarify the allocation of attributes

NO: If the proposal is not true

NA: No joint projects



Please specify the information requested

Please specify the information requested

Please specify the information requested

Instructions for assessment/explanations

YES : It treats imported GO differently from national issued GO in disclosure (for example: has criteria for accepting imported GO).

NO : No, treat them equally

YES : criteria in place

NO : no criteria in place

NA : no rejection of GO foreseen in the legislation

Please state which criteria of Art. 15 (6) RES Directive are implemented:

Electronic database in place

One competent body appointed by law

all GOs linked to disclosure

CO₂ emissions and radioactive waste included in disclosure display

transparent publication of disclosure information

others, please specify

Please specify

Please specify and indicate where those are published. If electronically please provide a link.

Please describe how it is done in the Domain

Instructions for assessment/explanations

Pls. Provide short explanation plus reference to website/regulation.

Pls. Provide short explanation plus reference to website/regulation.

Pls. Provide short explanation plus reference to website/regulation.

Pls. Provide short explanation plus reference to website/regulation.

Pls. Provide short explanation plus reference to website/regulation.

Pls. Provide short explanation plus reference to website/regulation.
