

Estonia		Electricity	Natural Gas including (bio)methane	Hydrogen	Other Gas	Heating/Cooling	Space for comments	
	Elering AS	Elering AS	Elering AS	[Author]	Elering AS			
	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS		Instructions for assessment/explanations
	28/03/2024	28/03/2024	[Please fill in date on which you filled in]	[Please fill in date on which you filled in]	[Please fill in date on which you filled in]			
<b>General</b>								
Does your member state have a disclosure obligation for origin of supplied/consumed energy?	Yes	Yes					the residual mix for heating and cooling is currently under	Yes/No
- If yes, To which economic operators does it apply?	Electricity suppliers, metering point owners	Transport sector suppliers, metering point owners						Please specify (categories like: regulated suppliers, corporate consumers, all, ...)
- If yes, Under what rules it is governed?	Electricity Market Act, Energy Sector Organisation Act	Liquid Fuel Act, Atmospheric Air Protection Act, Energy Sector Organisation Act						Please name the relevant regulations and provide a reference (preferably a version in English)
When did the regulation(s) regarding disclosure initially come into force?	2014-05-07	2017-07-10						Please name the date in which the regulation(s) initially came into force. <b>Date format: YYYY-MM-DD</b>
When was the last revision of the disclosure regulation(s)	2015-07-01	2023-07-01						Please name the date of the last revision of the disclosure regulation(s)
who is the Competent Body in charge for the supervision of disclosure?	Estonian Competition Authority	Estonian Competition Authority						Please specify name
- Since when are they in charge of supervision of disclosure?	2014-05-07	2022-05-28						Please specify date
- Under which legal nomination (law/decree/decision) are they appointed as competent body?	Electricity Market Act	Energy Sector Organisation Act						Provide reference to legal nomination
Are GOs the only instrument for disclosing known origin in disclosure statements to final customers?	Yes	Yes						Yes/No
- If no, please specify the other instruments								Please specify
Which measures are in place for supervision of suppliers regarding their disclosure of the origin of the gas of their supply?		Biomethane registry, national transport sector quota exchange platform, electronic connections with external systems.						Gas only, please describe
Do suppliers submit samples of their invoices to the disclosure supervisor?								Yes/No. Disclosure supervisor for <b>electricity</b> : the authority supervising the obligation on suppliers to inform their clients about their supplier mix and product mix according to Electricity Directive 2019/944, Annex I, Article 5 Disclosure of energy sources.
- If yes, how often?								Please specify frequency
Is there a public report on the result of the disclosure supervision?	No	No						Yes/No
- If yes, where can it be found?								Please specify
If a supplier is active in multiple Member States: does the supplier mix in your country/region account for this?	No	No						Yes/No
- If yes: how does this influence the supplier mix in your country/region?								Please specify
<b>Implementation of Article 19 (8) of the Directive 2018/2001 and amended with 2023/2413</b>								
Have you fully implemented the requirements of Art. 19 (8) of Directive 2018/2001(EU) amended with 2023/2413(EU)	Yes	No						Yes/No
- If not, please specify which elements you have not implemented yet.		Residual mix is not implemented for gas						Please specify
<b>Unit of energy represented by a GO</b>								
Is the unit of a GO MWh?	Yes	Yes						Yes/No
Do you use smaller units than MWh for GOs?	Not yet	No						Yes/No

Is the standard size for smaller size GOs equal to 1 Wh?	Not applicable	Not applicable				Yes/No
- If no: please specify						please specify
Do you differentiate the different units in the disclosure statements?	Not applicable	Not sure, see comment				Yes/No, please specify
Please explain your methodology		transport sector				
- If no: please specify		consumption accounting is based on gaseous fuel's lower heating value and reporting is in MJ, biomethane production is based on the higher heating value and reporting is in MWh.				please specify

### Customer specific disclosure

Can a supplier tailor a dedicated product to a specific consumer?	Yes	Yes				Yes/No.
Can a consumer cancel their own GOs?	No	No				Yes/No.
Can other parties than licensed suppliers cancel GOs?	Yes	Yes				Yes/No.
Please describe the principles in case any of the above three questions apply, meaning that customer specific disclosure is allowed.		Cancellation of biomethane GOs takes place against real gas consumption at a concrete metering point.				Please describe
Please describe how the customer specific disclosure is executed in the registry?	End-consumers who own a metering point, can access green.elering.ee and view the origin of the electricity consumed (based on the guarantees of origin and residual mix) and information on the guarantees of origin cancelled on their behalf.	Data on biomethane consumption at a concrete metering point can be accessed by the owner of that metering point in the biomethane registry (biometaan.elering.ee).				Please describe the process; do customers have direct access to the registry, do you allow product mixes, etc?
- If yes: Is the Competent Body for disclosure responsible for supervising customer specific statements?						Yes/No
- If yes: are there any limitations for customer specific disclosure in place? Please specify						please specify, e.g.: only customers of a certain size receive customer specific disclosure options, etc.
When offered energy products include claims on the origin of the energy, are they always exclusively based on cancelled GOs?	Yes	Yes				Yes/No, please specify
- If no: please specify	If GOs are not used, then residual mix					please specify: when are deviations possible, what are claims based on otherwise.
When suppliers are offering two or more products, distinct in origin of energy: are they required to give product-related disclosure information to all their customers, including for the "default" product for those customers who do not choose a specific product?						Yes/No. Note that under Electricity Directive 2019/944, Annex I, Article 5, each electricity product must have a product mix. Default product: the product a customer gets if they don't make an explicit choice of supplier and product, in case it is different from other commercial products.
- If no, please specify						please specify

### Calculations of Residual Mixes

Gas only: Does your Member State calculate the residual mix for gases?						Yes/No
- If yes, which method is used to determine this?						Please specify
- If yes, who calculates the Residual Mix in your Member State?						Name of organisation
- Weblink to the results of the national publication of the residual mix						weblink or explanation from when onwards this is expected
Electricity only: Do you use the data of the Residual Mix calculated by the AIB?	Yes					Yes/No
- If no, please specify which data you use?						Please specify

### Timing of disclosure



Recognition of GOs from other countries							
Do you have criteria in place for accepting foreign GO for disclosure?	Yes	Yes					Yes/No
- If yes: Since when are these criteria in place?	2018-07-09	2022-05-28					Please specify
- If yes: Are the criteria transparently published in your country?	Yes, under Energy Sector Organisation Act.	Yes, under Energy Sector Organisation Act.					Please specify and indicate where those are published. If electronically please provide a link.
Are the conditions for the recognition of GOs from other countries based on Art. 19 of Directive 2018/2001/EC and 2023/2413/EC or compatible national legislation?	Yes	Yes					Yes/No
Do you recognise GOs from other countries that have not implemented a disclosure system?	No	No					Yes/No
Do you recognise GOs from other countries that have not implemented appropriate measures to effectively avoid double counting of GOs?	No	No					Yes/No
Do you accept imported GOs for disclosure from all EU member states and other members of the European Economic Area (EEA)?	Yes	Yes					Yes/No
- If no, please name the countries from which you do not accept imported GOs for disclosure	Yes, if electronically transferred through the AIB and are accurate and reliable.	Yes, if electronically transferred through the AIB and are accurate and reliable.					Please specify
- If yes, please specify the reasoning for accepting							Please specify
Do you accept imported GOs from parties to the Energy Community Treaty?	No	No					Yes/No
- If yes, please name the countries from which you do import							Please specify
- If yes, please specify the reasoning for accepting							Please specify
Do you accept for disclosure imported GOs from other countries than EU and EEA?	No	No					Yes/No. This question is merely oriented towards countries from EU and EEA, but others are welcome to fill in
- If yes, since when?							Please specify
- If yes, please name the countries from which you accept imported GOs for disclosure							Please specify
- If yes, please specify the reasoning for accepting							Please specify
Does the Domain treat imported GO as national GO when it comes to disclosure?	Yes	Yes					Yes/No
- If no, please specify							Please specify
Does the customer get information on the country of origin of the GOs in the disclosure statement?	Yes. End-consumers who own a metering point, can access green.elering.ee and view the origin of the electricity consumed (based on the guarantees of origin and residual mix) and information on the guarantees of origin cancelled on their behalf.	Yes					Yes, please specify where and how/No
Information on Environmental Parameters							
Does the supplier mix include information on environmental impacts?	Yes	Not sure, see comment					Yes/No. Note the legal requirement for such information for <b>electricity</b> : Electricity Directive 2019/944, Annex I, Article 5(b)

Please indicate the data source for disclosing environmental information with the supplier mix?	GOs and residual mix	Transport sector supplier mix is calculated by the Environmental Board. Biomethane consumption accounting is based on GOs, the biomethane GO also provides GHG emissions data related to the respective energy unit. All gas consumed that is not covered with a biomethane GO is considered natural gas.					Please describe how it is done in the Domain
Is there information on the guarantee of origin issued in your domain about meeting sustainability criteria and emission savings?	No	Yes					
- If yes, in segments where compliance with sustainability and emission saving criteria is required (e.g. transport or heating), do you require that the supply (consumption) in this segment is confirmed by a GO?	According to national legislation, biomass fuel is considered renewable when it meets the requirements and criteria for providing the sustainability of these fuels	Yes					
- If not, how is such consumption demonstrated and how is it reflected in the residual mix?							
How do you treat sustainability information in disclosure statements?		It is provided whether the consumed biomethane was sustainability criteria compliant and which certification scheme had been used.					please describe

**Information on Disclosure communication**

Is the annual disclosure of the supplier mix displayed on the energy bill?	Yes	Not yet					Yes/No
- If no, please specify where it is displayed.		Data on biomethane consumption at a concrete metering point can be accessed by the owner of that metering point in the biomethane registry (biometaan.elering.ee). All consumed gas that is not covered with biomethane GOs is considered natural gas.					Please describe
Is disclosure information of different suppliers centrally available (e.g. reports) ?	Elering also is required to publish the energy supplied by each supplier, <a href="https://estfeed.elering.ee/services/electricity-sellers">https://estfeed.elering.ee/services/electricity-sellers</a>	No					Pls. Provide short explanation plus reference to website/regulation.
If not, how is such consumption demonstrated and how is it reflected in the residual mix?		Data on biomethane consumption at a concrete metering point can be accessed by the owner of that metering point in the biomethane registry (biometaan.elering.ee). All consumed gas that is not covered with biomethane GOs is considered natural gas. Residual mix is not calculated for gas yet.					
Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.							Pls. Provide short explanation plus reference to website/regulation.

Regulations on Power Purchase Agreements (PPAs)							
In terms of disclosure, how do you treat energy that is bought in a competitive setting or in a long-term power purchase agreement?	Energy that is bought in a competitive setting or in a long-term power purchase agreement needs no be accompanied with the RES GOs to be considered renewable.	Energy that is bought in a competitive setting or in a long-term power purchase agreement needs no be accompanied with the RES GOs to be considered renewable.					Please describe
Who is responsible for disclosing/cancelling the GOs for competitive settings or long-term purchase agreements?							supplier/plant operator/customer? Please specify

Energy Storage							
Can storage prolong the lifetime of a GO for more than 12 month after the production of the energy unit?	Not applicable as we do not issue GOs for storage.	Not applicable as we do not issue GOs for storage.					Please describe
Does your system facilitate "Storage Issuance" (= cancel GOs for the input into storage and issue GOs for the storage output, with new production period?)							Yes/No
- If yes, do you provide separate cancellation statistics for energy that goes into storage?							Please describe
- If yes, do GO issuance statistics have a separate category for energy released from storage?							Please describe

Other Reliable Tracking Systems (RTS)							
Next to GOs, do you also allow other RTS as basis for Disclosure? (ex. Contract based tracking, Residual Mix, tradeable Proofs of Sustainability (PoS), etc)	Yes	Not yet					Yes/No
- If yes, please describe	Residual mix	Residual is not calculated for gases yet.					Please describe
- If yes, are they treated in a way that is legally separated from GOs?							Please describe
How do Proofs of Sustainability interact with the GO system?	N/A	PoS is linked with GO (they are combined into one certificate that is the national biomethane GO) in the biomethane GO registry.					Please describe
What measures prevent that a Proof of Sustainability is allocated to a different consumer than the GO that was issued for the same energy? (Double disclosure)		PoS is linked with GO (they are combined into one certificate that is the national biomethane GO) in the biomethane GO registry.					Please describe
Do you prohibit statistical data to be used for determining the energy sources of energy obtained from exchanges?							Yes/No
- If no, under what circumstances do you allow statistical data to be used for determining the energy source of energy from an exchange?							Please describe
Do you prohibit statistical data to be used for determining the energy sources of imported energy?							Yes/No
- If no, under what circumstances do you allow statistical data to be used for determining the energy source of imported energy?							Please describe

Data sources							
What is the data source for production data?	National central electricity data hub.	National central gas data hub.					Please specify
- If possible, link to data source	andmeladu.elering.ee	gaasianmeladu.elering.ee					Please specify the website for the data source and which party is in charge

When are the statistics based on production measurement data available for calendar year X?	15.01 in year X+1	15.01 in year X+1					Please specify
Is production data available with (sub)hourly granularity?	Yes	Yes					Yes/No
- If yes, which production categories?	All production	All production					Please specify
- If yes, what is the granularity of the data?							10mins/15mins/20mins/...
- If yes, how long after the production period is the data available?							Please specify
What is the data source for consumption data?	National central electricity data hub.	National central gas data hub.					Please specify
- If possible, link to data source							Please specify the link to the data source
When are the statistics based on consumption measurement data available for the calendar year X?	15.01 in year X+1	15.01 in year X+1					Please specify
Is hourly consumption data available?	Yes	Yes					Yes/No
- If yes, for which consumption categories?	All consumption	All consumption					Please specify
- If yes, what is the granularity of the data?							10mins/15mins/20mins/...
- If yes, how long after the consumption period is the data available?							Please specify
Who is in charge of collecting statistics for Proofs of Sustainability (PoS) issued in your Domain?	N/A	Elering AS					Please name the organisation in charge
When are the data for the PoS made available?		Biomethane producers submit a certificate that proves compliance with the EU sustainability criteria prior to issuance of GOs for the respective biomethane.					Please specify
Is it possible to issue a PoS and a GO for the same energy production?		There are no separate PoS certificates, information on compliance with the EU sustainability criteria is attached on biomethane GOs.					Yes/No
- If no, how is this ensured that only one of the two instruments is provided to a producer?							Please specify
- If yes, can the PoS be allocated to a different consumer than the consumer for whom the GO is cancelled?		No					Please specify
- If only a PoS can be issued, how will you ensure that the new obligation for gas suppliers under RED III Article 19(8) is fulfilled?							
How does a GO interact with a PoS, please describe the process/cooperation	According to national legislation, biomass fuel is considered renewable when it meets the requirements and criteria for providing the sustainability of these fuels	Biomethane producers submit a certificate that proves compliance with the EU sustainability criteria in the biomethane registry, the information on compliance with the sustainability criteria is then attached on GOs.					Please specify

#### Timeline of disclosure

When is the residual mix communicated to suppliers?	30th June	Not applicable yet					Indicate approximate timing every year
When do suppliers provide disclosure figures (product mixes) to the disclosure authority?							Indicate approximate timing every year

When does the disclosure authority validate and publish the disclosure figures: product mixes, supplier mixes, other disclosure mixes (if applicable)?							Indicate approximate timing every year
When do the suppliers inform their clients about the disclosure figures?							Indicate approximate timing every year. E.g., is it by the 1st September of year X+1 for disclosure figures of year X or another deadline?

#### GO usage per system boundary

Do you have rules in place that restrict the usage of GOs to a certain system boundary?	No	No					Yes/No (E.g. are there restrictions for where to use electricity GOs? Can hydrogen GOs be used for consumption from the natural gas grid? Can biomethane GOs be used for consumption from a hydrogen grid? Any specifics on vehicle transported gases? Restrictions on where heating and cooling GOs can be used? e.g. can heating and cooling GOs be exported? can they be used on another heating grid than where they were produced? etc)
- If yes, please specify							Please specify
For Gas GOs, what defines the Network Characteristics for which a certain Gas GO may be cancelled, in line with REDIII art. 19.8?		Currently, no restrictions.					Please specify
Will you allow cancellation of methane GOs for consumption in a Hydrogen System?		Not applicable yet					Please specify
Will you allow cancellation of Hydrogen GOs for consumption in a Natural Gas System?		Not applicable yet					Please specify
Which GOs are allowed for consumption of vehicle transported gases?		Currently, no restrictions.					Please specify
Which GO usage restrictions apply in relation with the Dissemination Level for which the GO is issued?		Currently, no restrictions.					[see EECS Fact Sheet 20 for values of Dissemination Level on GOs - Expected to be also in CEN EN16325 annex E]
Does your member state publicly provide GO cancellation statistics per consumption category?	No	Yes					Yes/No (e.g. cancellation for final consumption / for energy carrier conversion / for input into energy storage / for transition into another certification scheme)
- If yes, into which consumption categories are statistics divided?	Currently only final energy consumption.	Not sure, see comment					Please specify
Does your member state provide GO cancellation statistics for energy that changes dissemination level during its chain of custody?		No					Yes/No
Do you distinguish different types of GO cancellations: cancellations for final energy consumption vs. GO cancellation for input into energy carrier conversion, for storage, for transitioning into another certification mechanism or other?		Not applicable					Yes/No/Please specify
Does your member state provide statistics on GOs that are cancelled for input into energy carrier conversion (= for GO Conversion Issuance)?		Not applicable					Yes/No
Link to the detailed cancellation statistics		<a href="https://elering.ee/biometaani-paritolutunnistused">https://elering.ee/biometaani-paritolutunnistused</a>					weblink

#### Supervision on Disclosure obligation



