Technical support for RES policy development and implementation.

Establishing technical requirements & facilitating the standardisation process for guarantees of origin on the basis of Dir (EU) 2018/2001

Task 2
Developing Technical requirements for the extended coverage of GO

Part 4: Responses to the consultation on FaStGO draft text proposal for a revised CEN - EN 16325 standard on guarantees of origin as published on 25th May 2020

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FaStGO
Facilitating Standards for Guarantees of Origin

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1 Introduction

This document consists of an overview of the answers to the consultation of the FaStGO text proposal for a revision of EN16325 standard on guarantees of origin, as was published on 25th May 2020. The consultation ran until 19th June 2020. This text proposal has been updated as task 2 part 2 version 2 which is published on 8th July 2020.
The report for Task 2 Part 3 summarises the main takeaways from the consultation.

The responses are categorised in two tables. The first table displays general comments. The second table provides an overview of article-specific comments. FaStGO project team provided a brief reaction to all comments.

2 General reactions to the FaStGO text proposal of 25th May 2020

Organisation	Please give generic endorsements (if any) to the proposed changes:	Please give generic comments (if any) on how you suggest to improve the proposed changes:	FaStGO Response	Amendment to Proposal
3Degrees Group, Inc.	3Degrees Group, Inc. ("3Degrees") appreciates the opportunity to participate in this consultation on the FaStGO proposal for a revised EN16325 standard on Guarantees of Origin. We are a leading provider of comprehensive, global clean energy and emission reduction services that enable organizations and individuals to transition toward a low-carbon economy. We want to acknowledge the amount of work it has taken to develop these proposed revisions, and we strongly support the improvements that will lead to increased standardisation, credibility, and accessibility in the market for GOs, specifically: Prevention of Double Counting/Disclosure: We support revisions that add specificity to the prevention of double counting, including the requirement that only one GO be issued for each MWh, that cancellation of GOs be required for end-use disclosure, and that GO cancellation be required for energy carrier conversion. Double counting is the single greatest threat to the credibility of the GO market, and we support further stakeholder	Validity/Expiry: Given current precedent, and in order to ensure consistency across EU Member States, it is logical to enforce a standardised 12 month validity/expiry rule instead of allowing an additional 6 months of flexibility for cancellation. While this flexibility may be useful to some market participants, it could create heterogeneity and confusion in the market. Should the additional 6 months between validity and expiry be necessary to resolve confusion created by REDII, this flexibility should be universal rather than discretionary. A lack of consistency between individual markets can undermine the credibility, efficiency, and fungibility of the GO system, and EN16325 is uniquely suited to resolve this issue. Additionally, we recommend clarifying whether the same validity/expiry requirements should also apply to gas GOs. GO Cancellation: There are two key changes to this standard that would significantly improve cancellation processes; these are: 1) adding language that would actively improve access to GO registries for all market participants, and 2) adding language to push Member States to improve the functionality of registries, such that companies would not need to operate individual registry accounts in each country in which they have operations. Regarding the first point, although we saw this was referenced as an objective in the Explanatory Notes, we were unable to find any specific language that would actually force Member States to improve the accessibility of cancellation rights for all market participants. We have	1) Validity: Agreed it would be better to harmonise also cancellation period. For the consensus process in CEN there is no sufficiently harmonised view to establish such however. It is advised that the legislator harmonises the cancellation period rather than the standard. 2) The standard facilitates cancellation by non-suppliers. Mandatory access to registries: left up to member state discretion, as this requires the broader disclosure framework to facilitate such in a reliable way (incorporating cancellations by non-suppliers in the national fuelmix exercise). 3)	none

	engagement to facilitate the ongoing improvement of the integrity and impact of this market. Validity/Expiry: We agree that Article 19.3 of the second Renewable Energy Directive (REDII) is not sufficiently clear regarding the timelines for validity and expiry, and we support the proposal to provide clarity and consistency through EN16325. We support having the same validity and expiry rules across all Member States; this will strengthen the GO market, promote fungibility, and increase consumer confidence in the GO instrument. We have included our recommendations on how to improve the rules related to validity/expiry in the next section of the consultation. GO Cancellation: We support the proposal to extend the definition of disclosure beyond energy suppliers in order to facilitate the removal of barriers to GO cancellation in the country of consumption. Current cancellation rules present significant administrative barriers to corporate purchasers with operations across Europe, especially in countries where cancellation can only be performed by electricity providers. These improvements are in line with Article 15.8 of REDII, which directs Member States to address barriers to long-term power	provided a specific text-change recommendation in the following section of this consultation. Regarding the second point, we hope that EN16325 can be leveraged to nudge Member States toward facilitating technological improvements that would allow end-use consumers to use a single registry account to cancel GOs for their operations across Europe. This would significantly reduce administrative costs, freeing up further capital for renewable energy investment. Proper accounting of consumption and registry fee disbursement are perfectly feasible under this model. Geographic Boundaries: To protect the credibility of the GO market, it is critical for market boundaries (related to both the EU and AIB) to be transparent and consistent, and significant changes should be thoughtfully phased in, e.g. by incorporating a grace period, to avoid undermining trust in market rules. The proposed EN16325 revision seeks to establish a clear GO market boundary, but it calls into question whether GOs may be claimed in countries outside of the EU that are still part of the synchronous grid of continental Europe. Specifically, it seems to restrict the ex-domain cancellation of GOs, as is permitted by EECS Rules. We encourage you to condenser the perspective of countries connected to the European grid which do not yet have credible purchasing options; the purchase of GOs allows companies in these countries to support renewable energy in their grid region while advocating for better local procurement options. If electricity can be traded between these countries, then the environmental attributes of electricity should be fungible as well, and broader access to credible purchasing options increases demand for renewable energy across Europe. If the main rationale for moving away from ex-domain cancellation is to prevent the leakage of attributes outside of the EU, then we encourage stakeholders	Single account for multinational players: too early to regulate in the standard for now. Needs broader framework and cooperation between issuing bodies and disclosure competent bodies, for which the European legislation assigns the responsibilities at national level for now. FaStGO task 3 looks into it. 4)geographic boundaries for cancellation and export: objective is indeed to prevent leakage of attributes, and thus reinforce the credibility of the residual mix inside the area where the European renewable energy directive and disclosure framework is applicable. 5) Cancelling GOs in domain X for use in a domain Y of nother registry risks to jeopardise the national fuelmix and residual mix accuracy of both	

	purchase agreements (PPAs). Signing a single, high-impact PPA can help companies contribute to Europe's energy transition and allow them to claim renewable energy usage across numerous EU countries; efficient cancellation protocols and clear geographic boundaries for the European market are critical to sustaining the credibility of GOs and improving the attractiveness of long-term PPAs. We have included recommendations on how to improve cancellation processes in the following section.	to discuss alternative remedies to this concern rather than to remove purchasing options in European countries that have not yet developed renewable energy markets. We welcome the opportunity to be part of these continued discussions. GO Ownership: Proposed language in the EN16325 update indicates that the Account Holder in a registry shall be considered the owner of the GOs in that account. We support the intention of this rule, i.e. to protect against GO VAT fraud, but we want to ensure that this will not have unintended implications for the cancellation of GOs in countries that limit access to GO registries. For example, if a company is holding a GO in its own account in one country and wishes to cancel that GO on behalf of consumption in another country in which it cannot operate a registry account, then that company must rely on another party to perform this cancellation on its behalf. This company may prefer to do so without legally transferring ownership to this other party. Although this point would be moot if cancellation processes were improved, we encourage you to consider this question of ownership in scenarios where an external party must perform cancellation. Interplay of GO Issuance & Sustainability Certificates: In response to section 2.6 of the Explanatory Notes, we believe that forbidding the issuance of a GO when a sustainability certificate is granted, or ensuring that the GO and sustainability certificate remain permanently bundled together, are the most effective ways to protect against double disclosure. Renewable energy that is counted toward a transportation fuels target should not be eligible to produce GOs that are used for non-transportation related renewable energy claims.	domains X and Y. Ownership of GO for cancellation in other registry: better to settle the concern in the considerations for a pan-European registry+disclosure framework. 6) Noted. Can be managed outside the standard. 7) energy eligible for tradeable GOs: the text proposal aims to meet the mentioned concern.	

		Energy Eligible for Issuing Tradeable GOs: If the majority of market participants and stakeholders believe that issuing tradeable GOs for generation consumed onsite would undermine the credibility of the GO market, then we support restricting this behavior. However, we do believe it would be rational to issue GOs for electricity consumed onsite, as long as: 1) this on-site electricity usage is not claimed as renewable, 2) the facility is grid-connected, and 3) there is a process in place to ensure that only the purchaser of the GOs has the sole claim to be using this renewable energy.		
ACT Commodities	I do endorse the overall generic of the proposal	I do endorse the overall generic of the proposal but would also like to refute the topic of transfers especially with 3rd country. 3rd Country GOs are countries that are not part of EU nor part of EEA. For example, Switzerland is a country that falls into this place and so far there has not been any agreements with regards to GOs for the RED II period. However, under the RED I, many GOs have been transfered between the EU member states and Switzerland and some have also been sold on a forward so this might be an issue in the coming RED II.		
AFHYPAC	The French Association for Hydrogen and Fuel Cells (AFHYPAC) generally welcomes FastGO's approach to proposing a revised draft of standard EN16325, to be used as a starting point in the formal CEN/CENELEC process of standard revision. We believe that the technocratic approach taken by FastGo in proposing and justifying adequate changes, in line with existing legal requirements in the EU, is the right approach to beginning the formal standard revision process within CEN / CENELEC. We welcome DG Energy's role in	AFHYPAC supports the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling. We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO system. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (e.g. from electricity to hydrogen, from hydrogen to methane,		

	facilitating the work of FastGO and providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements. We believe this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness of the final version of the standard.	etc.) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. An exception for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG / Blends) could be envisioned in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes. Only by separating GO systems between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed) can a robust GO system be designed.		
AGCS Gas Clearing and Settlement AG	The FaStGo project consortium, led by AIB, has invested a lot of efforts to provide the presented text proposal for the EN16325 Standard. The efforts and contributions of all partners, especially of AIB, are highly appreciated. The proposed structure with a generic chapter in the beginning, followed with specific chapters per energy carrier (electricity, hydrocarbon gas, hydrogen, heating & cooling) seems very suitable.	The text of the standard should be completely neutral, independent of any organisation, any developed scheme or any IT-system. It should be valid for many years and thus neutrality is of importance. Our proposal is to delete any comment of existing organisations completely from the text to provide neutrality. The current text proposal does lack some clarification on the distinction on the "renewable" and "fossil" origin of energy carriers, in particular gas. Specifically, in the section of hydrocarbon gas, the production process for renewables brings several particularities. Clarification is needed on the documentation of fossil gas extraction facilities if needed at all and the import from third party countries. It seems sufficient to disclose the renewable character of hydrocarbon gas as all residual volumes are fossil. Due to the very continuously declining production volumes of fossil gas within the European geographical scope, it might be efficient to abstain from documenting fossil hydrocarbon gas as well as imports from third countries. Most likely, all of the non-categorised gases in the Annex of the EN16325 standard will be fossil, independent if produced in Europe or in third countries. The concept of energy carrier conversion is not yet	The Renewable energy directive allows for GOs to be issued for all energy carriers. It is considered beneficial, if non-renewable gas GOs are issued, that those are handled according to the same standard rules, in order to facilitate efficient GO registry operation, market function and governance of disclosure. Inspection rules are harmonising the desired quality assurance, not the exact way to get there, to respect different national practices and efficiency in synchronicity with other national practices.	None

		sufficiently described. Considering that the technology and market are not yet highly matured, the conceptualisation is a difficult task. However, in the text proposal, it should be taken care of describing the type of conversion sufficiently in the respective section. The concept on inspection of production devices and especially of information (attributes) related to the GOs themselves should be clarified in order to provide concrete definitions on the implementation on national GO level. Otherwise there might be an enormous difference in the execution and documentation of national inspections having possible influence on the acceptance of GO in another Member State after cross-border transfer.		
Air Liquide				
Air Liquide				
Association ECS Switzerland	Great work done!	Some changes to be adapted as mentioned further down paragraph per paragraph in the following fields: EN 16325 as overarching standard (changes in §1 needed, as well as in text in 0. Introduction, 0.1 General) GO-expiry (changes in §4.9.4 needed, as well as in §4.9.2.1.4) Restrictions on exports and imports (changes in §4.7.3.3 and §4.7.3.4 needed) Restriction on Disclosure (change in §5.1.9 needed)	Noted	Commented in § specific section
Association fod District Heating of the Czech Republic		-	-	-
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	BDEW supports the work of FastGO on the revised EN 16325 standard. For cross-border trade of renewable and decarbonised gases, a uniform European system for proof of origin or sustainability and the GHG intensity is the most	Regarding the question how far should EN 16325 go with regards to facilitating multi-purpose certificates, we would support option 1 for using the same electronic docu-ment that comprises the GO to be used for other purposes. BDEW agrees that the parallel system in generation sustainability certificates and GOs will be burdensome. Therefore, the EN	The text proposal aims to enable the same electronic document to be used for other purposes through the attribute 'purpose' on	None.

	important requirement. However, there are currently a wide variety of models for sustainability requirements in the different European member states, which also differ according to sector-specific application. Likewise, not all European member states have a binding system for the introduction of GOs. Based on these different conditions, it is currently difficult to trade renewable and decarbonised gases across borders. Therefore, we agree, that a pan-European GO system would benefit from harmonising as many of the rules as feasible. However, the GO system should endorse the European market of GOs and should therefore be kept as simply as possible in administration. We agree with the proposed principle in Article 2.13., to keep a single data field on the GO to refer to the energy source of the input. The proposal of an additional data field on the gas and hydrogen GOs seems to be a good solution. We support the proposed optional data field on the GO reflecting the carbon footprint.	16325 should make an option available where systems can be combined. A possibility should be created for additional information (defined criteria & properties) in order to enable further evidence based on the GO. These can e.g. add information on the sustainability of GO as a kind of “backpack-principle”, in order to serve as proof of sustainability for specific purposes. In this way, the GO provides the basis for addi-tional information such as GHG intensity in particular, but also regionality or sustaina-bility characteristics which can optionally be added. Despite the former, the possibility for addition of these information should also be harmonised. Regarding Article 2.14 we do not understand the need of a definition for network com-patible gas because it is already defined in the European gas regulation. We do not see the need to distinguish between gas GOs and hydrogen GOs because hydrogen is also included in the gas GO. Therefore, hydrogen should not be treated as another energy carrier and the GO system should not be distinguish between hy-drogen and hydrocarbon gas as proposed in Article 2.	the GO. It is seen to early to integrate in this version of the standard all the requirements for other purposes. The text proposal leaves the option to have more data fields on the GO. It is up to the issuing bodies to facilitate such, and to evaluate their learnings on this field. With regards to gaseous energy carriers, there is a demand observed to distinguish hydrogen as a separate energy carrier. In electricity, not differentiating info on GOs relating to consumer concerns has proven to undermine consumer trust and the market value of GOs, while the opposite has proven to strenghten those.	
Becour			-	-
BGH2A	Bulgarian hydrogen, fuel cell and energy storage Association (BGH2A) supports FaStGO work on standard EN16325, which will fasilitate CEN/CENELEC standard revision process. The changes proposed by FaStGO are adequate , corresponding to	BGH2A supports the extension of EN16325 to cover four distinct energy carriers: (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling. We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems. In our opinion energy products	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate	National GO Scheme updated to Domain GO Scheme

	the existing requirements. In our opinion the applied approach of DG Energy to provide CEN/CENELEC with a document which is already synchronized with most of the EU requirements is a positive one and will accelerate the standard revision.	which are interchangeable have to be treated as distinct energy carriers with their own, specific GO system. We think that the revised standard should help build a robust system of GO. The standard should be designed to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO). This will facilitate import of renewable energy and export of EU technology. A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not necessarily need to be limited to one country. The current GO system is generally defined by national GO schemes, and for hydrogen there is the possibility to implement one single EU system. The standard should give the possibility to MS to agree on implementing a single EU system, if they will choose to do so.	energy carrier . For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet. However FaStGO recommends CEN to do this after final adoption of the content by CEN JTC14 WG5.	
Colruyt Group	The proposed document appears to be a good starting point in the formal CEN/CENELEC process of standard revision. We believe that the technocratic approach taken by FastGo in proposing and justifying the necessary changes to the standard, in line with existing legal requirements in the EU, is the right approach in order to start the formal standard revision process within CEN / CENELEC. We welcome DG Energy's role in	1. We support the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling. We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO schemes. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO scheme. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier .	none

	facilitating the work of FastGO and, by doing so, providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements. We believe this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness of the final version of the standard.	(e.g. from electricity to hydrogen, from Hydrogen to methane, etc.) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy value of the product that has been produced. A specific consideration for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG Blends) may be given in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes. We agree that there is no need, when H2 travels in H2 and NG blends for different GO's to coexist and only one GO (for Hydrcarbon gas) could be used However at a general level, only by separating GO schemes between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed by the current version of the FastGO project) can a robust GO system be designed. 2. We believe that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. As a result, the standard should be designed in a way as to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. We propose that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text.		

		3. A GO scheme, defined by a Domain (the geographical area over which it applies) and an Issuing Body, does not necessarily need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should replace, in its text, the notion of "national GO scheme" by simply referring to "GO scheme". This will not preclude a decision on this issue at a later date, as currently done within the text proposed		
Commerg Ltd.	Good proposals. We endorse. A couple of worries remain regarding the temptation of complicating the GO system. It is important to keep in mind that Standardization means simplification. And it is possible as it already works well. For instance: Adding a field for a mix of origins would be a mistake. To confirm this: There are categories of GOs that are generic and trade as such already. It works well. Example: Nordic Hydro, or AIB Renewable GO. They have a price and trade transparently.	Please keep resisting to attempts of complicating the GO system. It works well already. The focus needs to be on Standardizing the deadlines and principles of each Regulator and Registry.	Noted	None

EDF	1- We support the principle of extension of GO system to all types of energy carriers. In particular we support the idea that hydrogen and hydrocarbon gases should be treated separately as the logistics might be very different: they may be injected in different types of energy grid (e.g: dedicated H2 pipelines in industrial clusters), and H2 may be also transported by trailer trucks. It seems also very important to distinguish the two types of GO to avoid the risk of discredit of the whole GO system in case a gas energy consumption would be fulfilled by H2 GO or in case a fuel cell end use would be fulfilled with hydrocarbon gas GO and thus prevent accusations of greenwashing. 2 - We also strongly support the initiative of introducing a GHG criteria for each type of energy source. This criteria should reflect as much as possible the climate change impact of Energy use considering the different steps of the lifecycle, (including GHG emissions from power plant or land-use change for instance). Given the importance of the climate change crisis we consider that this criteria should be mandatory and not simply optional. 3 - More generally different environmental impacts of energy use should be disclosed as precisely as possible. In this respect considering only a nuclear waste criteria is too restrictive to	1 - Keep separated hydrogen and hydrocarbon gas GO systems 2 - Introduce a GHG criteria as mandatory for each type of Energy carrier. This criteria should consider emissions along the whole value chain 3 - Consider various environmental impacts of Energy use and not solely nuclear wastes 4 - Delete systematic reference to EU regulatory Framework 5 - Delete reference to labelling procedure 6 - Remove impossibility to deliver GOs for storage facilities not physically connected to energy production installations and let decision to include storage facilities at a MS level	For now there is not sufficient consensus for inserting such fields on GHG and sustatinabiliity as mandatory. GOs are only issued for production, not for stored energy, in line with art. 3 and 19of REDII. Carrying the label forward has proven to be a desirable practice for many stakeholders, as these can provide transparancy on more subjective information or additional criteria .	Consider adding a data field mentioning sustainability inforamation and/or whether the sustainability criteria are met. Consider replacing references to legislation by actual text of the referenced legislation.

	apprehend the whole environmental impact of energy consumption. It would be at least as much important to mention emission of particles, water consumption, air acidification, human toxicity, land use and impact on biodiversity or use of non-renewable resources. And these impacts should be considered along the whole value chain of energy production, for any type of energy vector certified 4 - Standard for GO should not refer only to EU regulatory framework and may consider in a large way all disclosure aspects, in particular all types of environmental impacts. In addition adoption of this standard by non-EU countries and its replication as an ISO standard should be facilitated. 5 - We consider that there is no need to refer to any labelling procedure in EN16325. GO system is limited to ensure the authenticity of attributes of a certain amount of energy produced. Labels may use these information to provide various type of offers to their client using the attributes renewable, low-carbon, local, or any other type of offer. 6 - Finally we disagree with the restrictions for storage facilities, including batteries and electricity storage facilities GO emission upon withdrawal from these units makes sense in case the previous injection has been covered by a GO cancellation, whether such storage facility			

	is directly connected to a production installation or not. It does not appear to be more complicated to deal with such cases than with energy conversion units, and would be working on similar principles.			
EFET	EFET welcomes the proposed changes to the EN16325 Standard. We fully support the efforts aimed at reinforcing consumer trust in the GO system. Many of the changes proposed place the consumers, through the expression of their preferences on the market, at the centre of the energy transition, which is fully in line with EFET's mission. We support the ambitious decision to standardise as many features of a GO as possible in order to ensure harmonisation across the EU that can facilitate cross-border trade. Standardisation is key to create liquid markets that are capable of forming clear and adequate price signals. In this context we are happy to support the standardisation of a fixed deadline for GO cancellations across the EU. We believe that establishing a GO scheme that ensures unrestricted cross-border trading is of key importance for the efficiency of the entire system. We endorse the firm statement that GOs can only be traded when the related output is tradable as well. Such approach	A broader discussion is still needed on whether carbon footprint and other sustainability measures should be mandatorily disclosed in an effort to establish a common denominator for all tradable instruments derived from different energy carriers. While we understand the project is under time pressure, we do not believe that this option should be ruled out at this stage. For installations where it would not be possible or economically viable to precisely measure or calculate their carbon savings, one option worth discussing would be the introduction of default minimum values that would prevent exclusion of these assets from the "exchange mechanism" without undermining the credibility of the system. While we acknowledge that currently national schemes are free to determine whether GOs are issued for onsite consumption or not, we believe that this is an area that needs to be harmonized. Such non-tradable GOs should be issued for all eligible energy carriers in order to ensure system's consistency. We recognize that such standardisation may be going beyond the scope of the consulted document, but we believe a clear preference towards this approach should be signalled to the relevant authorities. When it comes to validity of a GO, while we support the general need to standardise as many rules as possible, we are concerned about the treatment of storage under standard 12-month period. As per the wording under section 2.3 of the	Call for establishment on the long run of a single instrument for certifying sustainability features and disclosing the origin of energy to end-consumers is noted, together with a call for further elaboration of the carbon footprint data on the GO. Storage is not production and hence not eligible for GO issuing. In a book and claim system, there is no need for the extensive administration related to conversion issuance, for the purpose of storage.	None

	supports the credibility of the system. We also agree that a single data field should be kept for the input energy, so that the system remains transparent and manageable. We support adding optional fields for carbon footprint and sustainability criteria disclosure in response to the broad demand for such information. Such disclosure supports establishing interchangeability of GOs issued for different energy carriers. In the long-term we support the establishment of a single instrument for certifying sustainability features and disclosing the origin of energy to end-consumers. Such instrument could also be used under the ETS and allow perfect tradability of instruments generated by all technologies. We understand that for the incorporation of the carbon footprint ISO 14067 shall be used. While this is definitely a good and ambitious start, we propose to expand this to full LCA (ISO 14044) soon and already have this future expansion in mind in the current work. Competition between different technologies as well as credibility to end customers and the wider public will best be achieved if a transparent comparison of all relevant environmental aspects are incorporated in one instrument.	explanatory note, (…) validity may be understood as the consumption period, to which the cancellation relates. It would be worth exploring whether treatment of storage as conversion facilities would not be more consistent with the abovementioned definition and have benefits for GO trading through adjusting the validity to actual injection and withdrawal times. A relatively simple solution may be to extend the validity of GOs for storage to 24 months, with the possibility to review when there are higher penetration levels of renewable and decarbonised gases. System users would then be free to decide on the extraction time of the renewable/low carbon/decarbonised energy stored, according the principle that only the cancellation of a GO determines the characteristics of the energy consumed.		

Enagás S.A.		Enagás welcomes the opportunity of contributing to the FaStGO consultation. First of all, and regarding the definition of Hydrocarbon gas and the name of this energy carrier, Enagás suggests to replace “hydrocarbon gas” by “gas” given that term “hydrocarbon” refers to organic compounds containing carbon and hydrogen atoms, but it does not correspond to the reality of gas admixtures (including hydrogen gas, which is not a hydrocarbon) which could flow through the gas grid. The main purpose of Enagás’ answer to this consultation is to present our concerns with regard to the FaStGO proposal asking for a separate GO for Hydrogen (pure hydrogen) and a separate GO for gas (injected into the gas grid). Enagás believes that the current FaStGO proposal is not favoring a single liquid GOs market for gases (including pure hydrogen) and this option would bring more costs than benefits. The main reasons to support one single Gas GOs covering all gases, including hydrogen, are the following: 1. It helps create liquid GOs markets In order to ensure a cost-efficient and timely energy transition, it is important that GOs, irrespectively of the gas carrier, are easily available and transferable for consumers connected to the gas grids (both hydrogen and mixed gasses). Keeping one Gas GO for all gases, including hydrogen, accompanied of specific attributes such as “renewable hydrogen”, “low-carbon hydrogen”, “biomethane” or other like “renewable syngas”, etc., it would allow differentiating between the gas carriers, thus avoiding fragmentation of the	Call for liquid single gas market noted. If we are to understand 'single' in the geographical context, a single gas market is not understood as an argument for changing the structure. The liquidity argument is not clearly elaborated: why is the current proposal not facilitating liquidity? In the proposal, hydrogen flowing into the gas grid receives the same type of GO as the other gases that flow into the gas grid. For consumer trust it has proven essential to provide the differentiators consumers ask for, which calls for a differentiator on the GO to refer to hydrogen products as separate to other gas mixtures. Further as hydrogen and methane can be converted into each other and induce energy losses during conversion,	None

		gas market and maximizing the interchangeability/tradability for the concerned Gas GOs. 2. It would follow a similar approach already in use in the electricity sector. Having one Gas GOs for all gases (including hydrogen) is an approach similar to the one existing today in the electricity sector where one Renewable Guarantee of Origin can be sold at different prices just based on the different attributes (wind, solar PV, hydropower, etc.). Certainly, some consumers will only want Gas GOs regardless of their origin and concrete gas. For other consumers (like industries) the attributes included in the GO would be able to accommodate specific requirements in terms of molecule composition. As hydrogen is becoming of a strategic importance for Europe (no longer limited to industrial use only), the design of the future hydrogen market should be done with care. Contrary to what we have witnessed so far for hydrogen (i.e. restricted to mainly industrial use), a global approach for hydrogen will require a scale-up of infrastructure and a robust Gas GO system. By keeping one Gas GO , the “green value” would be easily tradable in one green market with the ability to differentiate between Gas GO according to its attributes. 3. It brings less complexity and it is quicker and more cost-efficient Asking for a separate GO for Hydrogen (pure hydrogen) would, upon its injection into the gas grid, imply an additional conversion step from a renewable electricity GO, to a	a measure is needed to account for such losses. In order to reduce administrative burdens, there is an exception proposed to simplify the conversion of hydrogen injected into the natural gas grid.	

		separate Renewable Hydrogen GO, to be converted finally later the Gas GO with a multitude of records, and more administrative burden associated. Moreover taking note of the FaStGO proposal to split GOs for multi-sourcing plants into different underlying output GOs, considering that the registries for Renewable electricity GOs, Hydrogen GOs and Gas GO are likely to be different entities (as confirmed by several countries), the administrative overhead will be substantial and more importantly significant delays are to be expected in issuing the GO, while the lifetime will remain the date (month) of conversion. Based on the wide experience from different market players, it is widely understood that the majority of consumers would not be interested in knowing origin of the Gas GO. The multiplication of types of GOs as proposed by FaStGO would only lead to complexity of registration which is not of interest for a liquid market. 4. It is aligned with the RED II Enagás understand that a single market for Gas GOs was envisaged in RED II as no specific disclosure rules for gas were defined. CONCLUSION Enagás invites FaStGO to duly assess the impact of its proposal. We believe that the FaStGO proposal asking for a separate GO for Hydrogen (pure hydrogen) and a Gas GO is not in the interest of a single liquid market, and thus not in the interest of achieving a cost-efficient and effective energy transition of the Gas market. Moreover, the additional complexity proposed by FaStGO proposal would create		

		administrative overhead and slower processes, which are not of interest for those aiming to deploy a liquid GOs trading market. Therefore, we believe that keeping one Gas GO for all gases, with specific attributes, will anticipate a better answer to needs of the gas market (both for pure Hydrogen as for mixed gasses) in the green transition faced in the years to come.		
EnBW Energie Baden-Württemberg AG	The current draft contains sentences that suggest a link or function of GOs with regard to energy infrastructure. However, in the book & claim principle, a GOs is decoupled from the energy system. Therefore, neither transport, storage nor conversion of energy needs to be considered	The standard should be neutral with regard to mentioning AiB/EECS (or other private companies and their products). Rationale: • EN 16325 is a technical standard and should be kept neutral with regard to private companies. A standard is a means to allow such competition. • Besides AiB, also the ERGaR scheme is developing a scheme to exchange gas-GOs. • The member states' authorities decide which hub to use, not CEN. => Remove all mentioning of AiB /EECS (or other private organisations/producst) in the document.	AIB is not a private company but a not for profit association of 28 issuing bodies for GOs, designated by their governments, of which several ones for gas and electricity. AIB has developed the EECS Rules, which are copied in the FaStGO text proposal, including a GO system for all energy carriers and energy carrier conversion rules. The reference proves the strength and operability of the text proposal, and acknowledges its source of data and expertise, but holds no standardisation value and can be deleted.	Paragraph deleted
ENGIE	1. On carbon footprint information We consider the information on the carbon footprint as key information that		Endorsement for consumer distinction of hydrogen as separate	(CEN to consider restructuring the text for

	should be included in the GO at least through an optional field. (We understand that for legal reasons, as it is not foreseen in RED II, a mandatory field in the standard might not be feasible). We underline the need for compatibility between GOs and sustainability certificates, which include information on GHG emission as well (both should use the same methodology in line with RED II). In fact, a respective field in the GO could facilitate the interlinkage between the two types of certificates, which is needed to avoid double counting. However, a life cycle analysis as proposed by RED II includes also the end use of energies (need to take into account the efficiency for instance of an internal combustion engine or fuel cell, a heating system, etc.), which is normally not known at the time when a sustainability certificate or GO is issued. This issue still needs to be solved. 2. On different categories for hydrogen and methane We agree that having 2 different categories for hydrogen and other gases would increase transparency and avoid confusion of consumers as it would not be possible to "mix" different energy carriers for disclosure purposes. For instance, according to our understanding, it would not be possible to use biomethane GOs to disclose the renewable characteristics of		energy carrier is noted, with a call for generic rules for all gaseous energy carriers. The aim of the FaStGO tekst is indeed to have generic rules for GOs of all energy carriers as much as possible. Support for GHG data on GO noted, together with a call for furhter elaboration of the interrelation of GO-sustainability criteria - GHG data on GO.	gaseous carriers)

	hydrogen consumed by a customer in a dedicated hydrogen grid, and vice versa. Just like it is not possible and should not be possible to use an electricity GO for gas consumption. At the same time, 2 different categories with different rules risk to come along with additional overhead and administrative cost and it is unclear at this moment whether markets and values of GOs for hydrogen will significantly differ from those for other gases. Against this background, we can support the proposed categorization with the following safeguards: • Ensure an unbiased naming: It is crucial to find another name for the first category of “hydrocarbon gases”. The word “hydrocarbon” implies carbon emissions, which is misleading as the gases under this category could a priori be considered to be more carbon-intensive than other categories (hydrogen, electricity, etc.). However, compared on a life-cycle basis, biomethane for instance, can have a very low or even negative carbon footprint, depending on the feedstock and technology used. We therefore propose to call this category simply “gases” or “methane and other gases”. • Create a seamless system: If two different categories of GOs are introduced, it is of key importance that			

	the systems can communicate between each other and GOs from one system can easily be converted to GOs from the other system given a conversion takes place, for instance renewable hydrogen is transformed to e-methane. These conversion mechanisms should not be hampered by different technicalities between different registries. Clear, simple, affordable and binding mechanisms should be designed at least at national level.			
ENTSOG	ENTSOG highly appreciates the work that was done by the FaStGO project team in preparation of the draft of the revised GO Standard 16325. We are of the opinion that revision and adoption of the new GO Standard is crucial for the design and establishment of credible and compatible national GO systems across the EU, in particular for different types of new gases. We acknowledge that adoption of this Standard will be one of the technical pillars of the future energy sector integration process and development of the energy market. Herewith we would like to point out that our response does not represent a final ENTSOG's position on the subject matter. Our comments were prepared to support the FaStGO project team in finalization of its draft proposal (published for the consultation) and are mainly focused on		Noted.	None

	technical issues that could be improved or clarified in the draft. ENTSOG's final position and comments on the subject matter will be provided to the CEN Secretariat (as a competent authority) following the discussion in the dedicated CEN Working Group.			
Erdgas Südwest GmbH	In the Webinar in thursday 11th of june I asked a Question concerning the production periods of plants which are important to calculate the velidity period of GOs. The answer I got was that production periods of one month maximum (except for very small sites) are planned. As a site Operator and Trader I consider these periods of one month as very short, causing unnecessary administrative burden. For example, in the German dena-Biogasregister production periods of one year are possible without any problems. This possibility makes life for all market participants much easier. In consideration of the differences between our daily Business today and the proposals of the FaStGO project, I suggest to give producers and traders the possibility to define production periods of one month or one year.		Given the expiry for trade at 12 months after the production period, a smaller granularity will be required indeed. Issuing frequency is however not very limited. It is possible for national GO schemes to issue e.g. for 3 production periods of the past 3 months at once.	none
Eurogas		Thank you for the opportunity to provide comments to the FaStGO draft of EN16325 revised. Eurogas supports the approach to standardise as many features of a GO as possible to ensure harmonisation across the EU and facilitate cross-border trade.	We understand the main argument to be in a fear for administrative complexity at conversion,(2) and a fear	None

		In general, Eurogas believes that EN16325 should provide for a single gaseous energy carrier – gas, including hydrogen – instead of providing for two seperate energy carriers – hydrocarbon gas (including hydrogen of a certain purity level) and pure hydrogen. The reasons for this are: 1) We believe the current draft is inconsistent with Art 19 RED 2, which reads in paragraph 7: " 7. A guarantee of origin shall specify at least: 1. […] (b) whether it relates to: (i) electricity; (ii) gas, including hydrogen; or (iii) heating or cooling; […] " 2) Energy carrier conversion from hydrogen to hydrocarbon gas, as will be frequently necessary when injecting hydrogen from specific hydrogen transport/distribution networks into gas transport/distribution networks to balance the blend, would generate additional costs that could be avoided by a single gas energy carrier. 3) The benefit of enabling the identification of hydrogen vs. hydrocarbon gas GOs would still be achievable through fields as "production technology“ and "energy source". In essence, this would mean that the „market“ would still be able to trade „Hydrogen GOs“ even when there is no separate energy carrier. „Hydrogen“ as a „Gas GO“ would easily be identified by market participants and labelled accordingly in the relevant communication with end-consumers. 4) The proposed definition of a separate energy carrier „Pure	of limited market liquidity. With a view to mitigate (2), in the text proposal conversion rules are simplified for hydrogen injected into gas grid, and conversion is not necessary when hydrogen is produced at the site of injection. (1) is a matter of interpretion of the legal text, several parties interpret this in several ways. (3) is a mitigation for indeed differentiating GOS from hydrogen towards consumers in another text structure for the standard (4) ignores the fact that GOs are a book and claim system separate from physical commodity transfer, and ignores a consumer call for identifying the product quality on a GO issued for the purchased product. (5) the argument of limited liquidity of split markets is not proven. what is this fear based on?	

		Hydrogen“ essentially leads to the disclosure of a purity level for hydrogen. This is inconsistent with the disclosure purpose of Art 19 RED 2 as it would disclose a product quality feature of the underlying commodity - which could/should be guaranteed contractually between producer and counter-parties - rather than a carbon abatement feature or an attribute to the energy content of the relevant product (which is relevant for consumers). 5) Separate gaseous energy carriers would risk split markets and thus limited liquidity to the detriment of both market segments. 6) The set-up of two instead of one gaseous energy carrier results in the risk of increased system-complexity and multiplying the number of involved institutions - with the consequence of increased cost of ensuring system consistency - in national GO schemes. This is mainly due to the maximum number of competent bodies per Member State or even per Region within a Member State (see 4.3.2.2 in N046 „… At any given time, the responsibility for a National GO Scheme for Issuing GOs for an Energy Carrier within a Domain shall be allocated to a single Competent Body with responsibility for that Energy Carrier within that Domain. ...")	projected supply and demand figures? an analysis of such and their impact on the development of renewable gas market would be welcome. (6) Member states are free to allocate responsibilities, the text proposal does not restrict such. There are already several member states where issuing body responsibilities are with the same organisation for all energy carriers.	
Falkenberg Energi AB	I support the extension of scope of EN16325 to cover four distinct energy carriers: electricity, hydrocarbon gas, hydrogen and heating. I fully believe the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers, which require specific GO systems, the way forward to a renewable energy system. Where several		Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU	Replaced National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider

	different energy forms enables us to use severeal different renewable energy forms. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO system. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (e.g. from electricity to hydrogen, from Hydrogen to methane, etc.) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. An exception for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG / Blends) could be envisioned in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes. Only by separating GO systems between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed) can a robust and trust whorthy GO system be designed.		legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet. However FaStGO recommends CEN to do this after final adoption of the content by CEN JTC14 WG5	removing all references to legal tekst

	I believe that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. As a result, the standard should be designed in a way as to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not necessarily need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental			

	purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should replace, in its text, the notion of "national GO scheme" by simply referring to "GO scheme". This will not preclude a decision on this issue at a later date, as currently done within the text proposed			
FEV Europe GmbH	EN 16325 should very clearly differ between Hydrogen and other specially carbon based gases, as they are very different from their production process and their GHG impact in their production and transport phase (including leakages) as well as in their use phase. Hydrogen has a special role which needs to be displayed in this regards and will very probably also have a dedicated infrastructure (even though this might be consisting in many parts of retrofitted or upgraded CH4 pipelines).	EN 16325 should very clearly differ between Hydrogen and other specially carbon based gases, as they are very different from their production process and their GHG impact in their production and transport phase (including leakages) as well as in their use phase. Hydrogen has a special role which needs to be displayed in this regards and will very probably also have a dedicated infrastructure (even though this might be consisting in many parts of retrofitted or upgraded CH4 pipelines).		
fgeg			-	-
Fingrid Oyj			-	-
First Hungarian Biogas and Solar Ltd	Generic endorsment	a) Delete parts where no Europe-wide regulation is necessary, provide more flexibility for national schemes and issuing bodies b) Remove all references to any private organizations, schemes, etc, like AIB, EECS, ERGaR, etc. c) Keep to the "book and claim" approach and remove all references to mass balancing methodology.	this proposal aims to harmonise those areas where harmonisation strengthens the credibility and functionality of the European GO market. It	-

		d) Delete references to other qualification methods, like labels, ETS, etc. e) Keep hydrogen separated from hydrocarbon gases.	therefore in many places harmonises the What and leaves the How for national discretion in the practical roll-out	
Fluxys		Point 5.2: Regarding the question whether we should envisage a separate GO for pure hydrogen or rather one GO for gas with a specific attribute (including for pure hydrogen), stakeholder discussion is not sufficiently mature to conclude yet. Hence, proposed FastGO solution merits further elaboration/discussion to duly assess impacts: (i) on liquidity / fragmentation of the market for hydrogen; (ii) considering the registries for GOs are likely to be different entities, complexity for converting GOs including possible issuing delays; (iii) the most adequate design for GOs / hydrogen market while anticipating hydrogen becoming a whole system transition solution. Finally, we propose to replace the term "Hydrocarbon gas" GO by "Gas" GO.	-	-
Fortum	For our knowledge standard works so that you are required to act and comply given the standard requirements. The standard should not describe what happens if before mentioned criterias are not fulfilled as that falls under legislative/regulative issues. Therefore the current proposal is having few odd topics which are simply not in sphere of technical standard. That also compromises the given time constraints and continuity of current GoO	The excessive work of FastGO project is welcomed, however it seems to be impossible to include all proposed changes to standard update as some of the topics requires political consensus and we feel that WG5 is not body to decide that.	Noted	Commented in § specific section

	market. These issues are more linked to specific items such as monitor, on-site definition (tradability) and GHG data. Majority of improvements are most welcomed and brings much needed harmonization between member states.			
Fronius Hungary Kft.	We think, that hydrogen should be a seperate category, which is independent from other gases. Hydrogen can be grey, blue or green. Green hydrogen means it made by renewable energy with water electrolyzation process. With the opponent process of electrolyzation, green hydrogen can be source of green electricity with fuel cells, without any kind of pollution. This unique ability carrying extra values to reach our European 2030 targets. Hydrogen has different technology requirements and therefore it is different from other gases. Even green hydrogen is different from the other hydrogen types. We recommend to have hydrogen or at least GREEN hydrogen a seperated category from other gases.	Estabilish a seperate category to green hydrogen.	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier .	none
Gaz Réseau Distribution France (GRDF)	The FAST&GO proposal well reflects the practice of national guarantees of origin registers and the needs on the subject. Some mentions/obligations in the generic part of the standard are however too affirmative and precise to reflect the specificities of the different energy carriers covered by this standard.	It will so be appropriate to delete the mentions of the generic part of the standard not adapted to all energy carriers or at least to mention that there are juste indications for Member States so optionnal (see after to identify the mentions/obligations concerned by this comment).	Noted	Commented in § specific section

German Energy Agency (Deutsche Energie-Agentur, dena)	The changes proposed by FaStGO seek to address the requirements needed for the issuance of Guarantees of Origin (GOs) for energy carriers other than electricity, such as gas (including hydrogen), heating and cooling. This is achieved by means of an extensive list of definitions (chapter 3) of the relevant concepts used in the Standard. Additionally, the Standard has developed a chapter for each energy carrier (electricity, hydrocarbon gas, hydrogen, heating & cooling) that addresses the specific requirements pertinent to each one of them. Experts in each energy carrier related area were approached to provide input to the respective specific chapter. We consider this approach to be correct. There are, however, several specific topics that need to be corrected because the approach taken by FaStGO was not the correct one. These topics will be addressed and commented in the following sections.	Being GOs new for gases (including hydrogen) and heating & cooling, the requirements needed for their issuance also become new topics that need to be addressed. It is extremely important that FaStGO considers and includes the comments from the experts for each energy carrier. We noticed that the document lacks neutrality by mentioning AIB, ERGaR, CertifHy and the EECS rules in the general section (chapter 0.2). There is no need for mentioning any organization, institution or rules scheme in a standard document. We can see that for the hydrocarbon gas section there are some specific topics that need to be revised, but we will address these in the following sections.	Noted. There is no lack of neutrality in mentioning the organisations on whoms experience the text is built.	None
German Hydrogen and Fuel Cells Association	German Hydrogen and Fuel Cells Association (DWV) generally endorse the proposed changes by FaStGO project team on the revision of standard EN16325.We find that the approach of FaStGO in proposing changes in the existing standard as to begin the formal standard revision process within CEN/CENELEC is in line with the legal requirements in the EU and could significantly speed up the revision process.	DWV supports the extension of the scope of EN16325 to cover 4 energy carriers: - electricity, - hydrocarbon gas, - hydrogen, - heating and cooling. DWV endorse the separation between hydrogen and hydrocarbon gases as two distinct energy carriers which require specific GO systems. The standard should be designed in a way as to facilitate its	Endorsement for separate hydrogen GO is noted. For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on	None

		adoption by non-EU countries, and its replication as an international ISO standard. This will facilitate import of renewable energies and export of EU technologies.	GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	
Green Gas Certification Scheme	Generally the text is a clear and sensible description of how a GoO Scheme should be run in terms of the process of issuing, transfer and cancellation and also of some of the key organisational points such as audits of production facilities, responsibility for account holders to keep log in details secret, and necessity for Scheme operators to have a good know you customer process for opening accounts.		Noted	None
GRTgaz	The draft text proposed is globally satisfactory: in particular the document recognizes several energy carriers which reflects actual processes of energy usages (electricity, hydrocarbon gases, hydrogen, heating flows, cooling flows). For each energy carrier a GO is attached on a logical way. The principle for GO conversion is safely stated: in particular the case of injection/blending of hydrogen into gas networks, which needs a conversion of either a hydrogen or an electricity GO (if hydrogen produced by an electrolyzer would be immediately injected into a gas network) into a hydrocarbon gas GO, keeping the unity of the gas market.	First we suggest to call "gas" the hydrocarbon gas energy carrier and we propose as a definition of the gas energy carrier the following one: "an energy carrier of which composition is compliant with the technical specifications of gas transmission as well as gas distribution networks. This energy carrier may be in a gaseous state as well as in a liquid state." We suggest also to improve by simplifying the traceability when hydrogen is injected into a gas network: from a consumer point of view and in order to keep simple the task of issuing bodies, the resulting gas GO should simply mention that it has been produced either by hydrogen or electricity only without detailing the type of electricity (PV, etc.).	GO standard should also be applicable for non-network injected gases, therefor one layer deeper the 'type of gas' = 'network -compatible gas' is introduced. There is not sufficient consensus to make GHG info mandatory. Energy source must be mentioned on the GO according to renewable energy directive art. 19.7.	None

	The possibility of having a multipurpose GO (not only renewable energy disclosure) is also clearly stated, even if this is only optional. We have to recall that it is crucial for industrial consumers to be allowed to use biomethane GOs for ETS compliance purpose, otherwise they could no longer use gas and either go out of Europe or spend huge investments to use electricity which is totally not optimal regarding the energy transition concepts requiring energies coupling for efficiency matters.	We stay to support to make mandatory any attribute in relation with GHG emissions.		
H2 Platform (The Netherlands)	H2 Platform generally welcomes FastGO's approach to proposing a revised draft of standard EN16325, to be used as a starting point in the formal CEN/CENELEC process of standard revision. H2 Platform believes that the technocratic approach taken by FastGo in proposing and justifying adequate changes, in line with existing legal requirements in the EU, is the right approach to beginning the formal standard revision process within CEN / CENELEC. We welcome DG Energy's role in facilitating the work of FastGO and providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements. H2 Platform believes this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness		Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal	Replaced National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider removing all references to legal tekst

	of the final version of the standard. 1. H2 Platform supports the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling. H2 Platform endorses the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO system. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (e.g. from electricity to hydrogen, from Hydrogen to methane, etc.) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. An exception for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG / Blends) could be envisioned in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes.		doesn't go in there yet. However FaStGO recommends CEN to do this after final adoption of the content by CEN JTC14 WG5	

	Only by separating GO systems between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed) a robust GO system can be designed. 2. H2 Platform believes that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. As a result, the standard should be designed in a way as to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. H2 Platform proposes that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text. 3. A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not necessarily			

	need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should replace, in its text, the notion of "national GO scheme" by simply referring to "GO scheme". This will not preclude a decision on this issue at a later date, as currently done within the text proposed			
HAMBURG INSTITUT	The technical support provided by FaStGO for the standard revision process is highly appreciated. The revision of EN16325 nevertheless faces the challenge that to date, practical experiences with extending GO certification for RES beyond electricity are very limited. Especially in the case of heating and cooling with its localised grid and generation, lessons from electricity GO certification can only be applied to a very limited degree. Indeed, research is only just beginning to examine what role		Call for flexibility for further development of H&C GOs noted.	None

	heating and cooling GOs and especially a heating/cooling disclosure could play in decarbonising energy supply, and what marketing strategies for RES installations could prove viable in this context. What we have, is a basic description of the problem, but we are far from having solid solutions (Hamburg Institute is starting a research project on these questions in late summer 2020). Even so, the revised EN16325 will significant-ly impact the shape of future markets for heating and cooling GOs. Against this background, we would like to argue for keeping the standard as flexible as possible, so that experiences with several design options can be gathered in the next few years. If during the implementation phase of EN16325, a mis-match becomes apparent between its specifications and the demands that producers and consumers place on the standard, provisions should be made for a timely revision and adjustment process. As our analysis of the implications of different GO design options is ongoing, we limit our response to selected issues, focusing on heating and cooling.			
Hungarian Hydrogen & Fuel Cell Association	It is the right approach, that all the energy vectors/carriers (electricity, gas, hydrogen, H&C) would be incorporated in the same standard. There is an urgent need for a comprehensive standard, including GO for	It would be extremely important, that hydrogen should appear as self-standing "entity" in the revised standard (EN16325). It should be established dedicated rules of Guarantee of Origin for hydrogen. It also means that hydrogen and hydrocarbon gases should be	Endorsement for separate hydrogen GO is noted. For making the standard copiable outside EU, the	None. For future: consider removing all references to legal tekst

	hydrogen to speed up its market deployment at EU level. For this reason FaStGO team's work on standardisation process is crucial.	separately managed. Moreover, it would be a clear advantage, if non-EU countries (or even the International Standardization Organization, ISO) could also apply (adopt) this GO standard sooner or later, to facilitate the global trading of hydrogen. So during the standardization process elaborators should think forward, and create a GO standard (for hydrogen) in such a way, that should be eligible to adapt outside the EU as well.	references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	
Hydrogen Denmark	Overall Hydrogen Denmark is very happy that CEN / CENELEC are preparing and developing an EU wide standard for Guarantees of Origin for Origin on Hydrogen. It is a positive and much needed step in the right direction. It is positive that the revision of EN:16325 will take REDII into account and expand its scope to cover both hydrogen, Hydrocarbon Gases and Heating and Cooling. Furthermore is it essential that EN:16325 clearly identifies hydrogen and hydrocarbon gases as separate and distinct energy carriers that will should be covered by their distinct GO schemes. In order to develop a market for hydrogen as its own energy carrier, and for the credibility of the GO system as a whole, it is essential that EN:16325 that a specific		Endorsement for separate hydrogen GO is noted	None

	GO system is created for the use of hydrogen only.			
Hydrogen Europe	Hydrogen Europe generally welcomes FastGO's approach to proposing a revised draft of standard EN16325, to be used as a starting point in the formal CEN/CENELEC process of standard revision. We believe that the technocratic approach taken by FastGo in proposing and justifying adequate changes, in line with existing legal requirements in the EU, is the right approach to beginning the formal standard revision process within CEN / CENELEC. We welcome DG Energy's role in facilitating the work of FastGO and providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements. We believe this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness of the final version of the standard.	1. Hydrogen Europe supports the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling. We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO system. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (e.g. from electricity to hydrogen, from Hydrogen to methane, etc.) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. An exception for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG / Blends) could be envisioned in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes. Only by separating GO systems between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed) can a robust GO system be designed. 2. Hydrogen Europe believes that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. As a result, the standard should be designed in a way as to facilitate adoption of the standard by non-EU countries, and	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	Replace National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider removing all references to legal tekst

		its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. We propose that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text. 3. A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not necessarily need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should replace, in its text, the notion of "national GO scheme" by simply referring to "GO scheme". This will not preclude a decision on this issue at a later date, as currently done within the text proposed		
Hydrogen Europe	We strongly believe that a suitable market for Hydrogen requires a specific GO system for Hydrogen. Standard EN:16325 should clearly identify (i) Hydrogen and (ii) Hydrocarbon gases as separate and		Endorsement for separate hydrogen GO is noted	None

	distinct energy carriers, covered by distinct GO schemes, To do otherwise, would undermine: (i) the capacity to develop a market for Hydrogen as its own energy carrier, (ii) the electricity production pathway of Hydrogen, as it creates the possibility for the "fake" greening of H2 consumption by using GO's issues for other hydrocarbon gases. (iii) the credibility of the GO system as a whole (as it opens it up to abuse)			
Hydrogen Sweden	Hydrogen Sweden supports the extension of scope of EN16325 to cover four distinct energy carriers: - electricity - hydrocarbon gas - hydrogen - heating and cooling. We endorse a separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems. We believe that a system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO system. Hydrogen and Hydrocarbon gases are different energy carriers, with different production methods, uses and characteristics.		Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now	Replace National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider removing all references to legal tekst

	In case of an energy Carrier conversion, between one carrier to another must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. Hydrogen Sweden believes that the revised standard should help building a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. The standard should be designed in a way as to facilitate adoption of the standard also by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. We propose that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text. A GO scheme, defined by a Domain and		the FaStGO text proposal doesn't go in there yet.	

	the Issuing Body, does not necessarily need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. The draft version of the standard should replace, in its text, the notion of "national GO scheme" by simply referring to "GO scheme". This will not preclude a decision on this issue at a later date, as currently done within the text proposed.			
Hydrogenics - Cummins	Hydrogenics-Cummins generally welcomes FastGO's approach to proposing a revised draft of standard EN16325, to be used as a starting point in the formal CEN/CENELEC process of standard revision. We believe that the technocratic approach taken by FastGo in proposing and justifying adequate changes, in line with existing legal requirements in the EU, is the right approach to beginning the formal standard revision process within CEN /	1. Hydrogenics-Cummins supports the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling. We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO system.	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU legislation should be	Replace National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider removing all

	CENELEC. We welcome DG Energy's role in facilitating the work of FastGO and providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements. We believe this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness of the final version of the standard.	Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (e.g. from electricity to hydrogen, from Hydrogen to methane, etc.) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. Only by separating GO systems between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed) can a robust GO system be designed. 2. Hydrogenics-Cummins believes that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. As a result, the standard should be designed in a way as to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. We propose that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text . 3. A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not necessarily need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to	replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	references to legal tekst

		implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should replace, in its text, the notion of “national GO scheme” by simply referring to “GO scheme”. This will not preclude a decision on this issue at a later date, as currently done within the text proposed		
ILR	Please use terms already employed by NRAs and grid operators when defining meters: i.e. energy withdrawal (off-taking from the grid) and energy injection. The proposed terms "export meter" and "import meter" can lead to ambiguities as the action of exporting and importing can be done by any actor in the energy market: consumer, grid operator, producer.	"injection meter" and "withdrawal meter".	open for discussion, just some energy carriers are not 'injected into a grid' but transported by vehicle	none
Invest In Norrbotten	We support FastGO’s proposed revised draft of standard EN16325 as a starting point in the formal CEN/CENELEC process of standard revision. We believe that FastGo's proposed changes are in line with existing legal requirements in the EU, and are thus the correct approach to beginning the formal standard revision process within CEN / CENELEC.	We believe that a reliable and trustworthy system of Guarantees of Origin requires interchangeable energy products to be treated as distinct energy carriers with their own specific GO system. This clearly applies to Hydrogen and Hydrocarbon gases as they are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (such as from hydrogen to methane, or from electricity to	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU legislation should be	Replace National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider removing all

	We support DG Energy's role in facilitating the work of FastGO and providing CEN / CENELEC with a document that aligns with the majority of EU requirements. We believe this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness of the final version of the standard.	hydrogen) necessarily entails the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. An exception for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG / Blends) could be envisioned in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes. And it is only by separating GO systems between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as is proposed) can a robust GO system be designed. 2. We believe that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislation. As a result, the standard should be designed so as to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. We propose that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text. 3. A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not necessarily need to be limited to one country. While the	replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	references to legal tekst

		current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should simply refer in its text to "GO scheme", as this wll not preclude a decision on this issue at a later date.		
ITM Power	We are concerned about the lack of a clear and separate identity for hydrogen, specifically renewable hydrogen. Hydrogen is distinct from the hydrocarbon gases in several aspects, so it's important that the Standard respects that. It is wrong to allow gas GOs to simply be used for any type of gas consumption. It must not allow GOs issued for the production of biomethane to be used to claim supply of renewable hydrogen, or renewable hydrogen produced for some purpose other than gas grid injection to be claimed as supplying renewable gas by the gas grid. It's not necessary or desirable to make the GO scheme national. One EU system is	There should be a GO scheme for hydrogen and a separate GO scheme for hydrocarbon gases. Establish a single EU wide approach. Facilitate its adoption by non-EU nations to promote international standards and help European manufacturers export their technology (eg. delete references to EU Directives in the definitions and main text)	Endorsement for separate hydrogen GO is noted. For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	None

	much more appropriate than the fragmented national approach that exists today for biomethane.			
KU Leuven	I endorse the addition of new categories, specifically the distinction between pure hydrogen and hydrocarbons.	Given that gases not only have energy inputs but also inputs of matter (water, carbon sources), it is important to explicitly track also the origin of the material input.	Welcoming clarification on suggested system for tracking material input. Endorsement for separate hydrogen GO is noted.	None
Kuwait Petroleum Research and Technology	I support FastGO's approach to proposing a revised draft of standard EN16325. The proposed is a good starting point in the formal CEN/CENELEC process of standard revision. FastGO is setup by technical specialist which is good. THe right changes are proposed and justified It's important that DG ENER playes its facilitatig role in the work of FastGO, so the document is already aligned with EU Requirements. Hopefully it speeds up the revision because it is really needed to have a good system available soon to support REDII implementation	1. hydrogen vs. hydrocarbon GO --> must be separate system! Our company fully endorses the separation between hydrogen and hydrocarbon gases as two distinct carriers with specific GO schemers. They are completely different vectors that are handled in a different way and contribute differently to the decarbonisation of our refining industry. We can use renewable hydrogen to decarbonize production (as an intermediat). Hydrocarbon gases are sold to end customers. This is a different way of working, a different application and different characteristics. GOs shoudl reflect this seperately. it's also possible to use hydrogen to make low carbon methane (= RCF). The transition from hydrogen to hydrocarbon must lead to cancellation of a GO (hydrogen), and issue a new GO (hydrocarbon). two seperate products must be kept separate. comparable to electricity GOs 2. A GO system must be designed to allow import of green hydrogen to the market, and must facilitate adoption to non-EU countries. Imported hydrogen must also be tagged green with a GO, and allow import from countries abundant of sun and wind, to make sure enough GOs are available on the market 3. the system must be EU wide standardized and harmonized.	Endorsement for separate hydrogen GO is noted	

		Avoid single membre state systems like for biofuels. One EU system for a one EU energy vector!		
Landwärme GmbH	- We strongly support the clear diferentiation between organic and non-organic renewable gases (hydrocarbons). The question remaining is: are decarbonised gases (CCS/CCU) in any way included in the defintion or not. - The proposed book and claim system will help to foster the internal EU market and the production/use of renewable gases. - Prevention of double subsidization is mostly sufficient. Especially at the production of non-organic renewable gases i.e. subsidized electricity shall not be used. Circular constructs need to be prevented.	Concerning the information on the GO we would like to add the following: 1) Obligatory Information: We suggest to include the GHG value for the obligatory informations. Many end uses for renewable gas require limited emissions or the value of the gas is directly related to the specific GHG emissions. Calculation should be done according to 2018/2001/EU, either individually or with default/standard values). 2) Additional information: We suggest to include the sustainability requirements according to 2018/2001/EU at least under the additional information. In the mid term even obligatory statement might be relevant. Most end uses (besides private customers or voluntary use) for renewable gases will require a proof of sustainability.	For now there is not sufficient consensus for inserting such fields on GHG and sustatinabiliity as mandatory. Consider adding a data field mentioning sustainability inforamation and/or whether the sustainability criteria are met.	Consider adding a data field mentioning sustainability inforamation and/or whether the sustainability criteria are met.
Ludwig-Bölkow-Systemtechnik GmbH	It is of major importance to identify gas (methane) and hydrogen as separate / distinct energy carriers. Combining them under the term "gas" is inappropriate as hydrogen can serve other purposes, notably in fuel cells, but also in chemical processes, where hydrocarbon gases are not suitable and/or significantly less energy efficient. Furthermore, methane is a very potent greenhouse gas, which means that methane handling will always		Endorsement for separate hydrogen GO is noted. For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on	none

	entail leakages having a strong climate effect. This is not the case with hydrogen. Therefore, hydrogen has different characteristics, uses and production pathways than methane, and must thus be covered separately. The standard specifies in many cases "national GO scheme", while national is arbitrary here and should therefore be deleted.The definition of "domain" does not include the notion of "national", and therefore "GO scheme" should also be used without limiting them to "national". The standard should not refer to the EU regulatory framework. This will facilitate the replication of the standard in non-EU countries and by ISO.		GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	
MVM Hungarian Electicity Private Limited Company	Hydrogen should have a separate guarantee of origin system. This approach could support differentiation for example between "blue" and "green" hydrogen, which will be crucial in the future in creating sustainable business models about hydrogen technologies.			
Nederlandse Gasunie			-	-
NEDGIA			-	-
Nedstack Fuel Cell Technology BV	Nedstack Fuel Cell Technology BV supports Hydrogen Europe and generally welcomes FastGO's approach to proposing a revised draft of standard EN16325, to be used as a starting point in the formal	1. Nedstack Fuel Cell Technology BV endorses the comments of Hydrogen Europe which supports the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling.	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of	Replace National GO Scheme by Domain GO Scheme to

	CEN/CENELEC process of standard revision. We believe that the technocratic approach taken by FastGo in proposing and justifying adequate changes, in line with existing legal requirements in the EU, is the right approach to beginning the formal standard revision process within CEN / CENELEC. We welcome DG Energy's role in facilitating the work of FastGO and providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements. We believe this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness of the final version of the standard.	We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO system. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (e.g. from electricity to hydrogen, from hydrogen to methane, etc...) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. An exception for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG / Blends) could be envisioned in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes. Only by separating GO systems between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed) can a robust GO system be designed. 2. Nedstack Fuel Cell Technology together with Hydrogen Europe have the opinion that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. As a result, the standard should be designed in a way as to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body	hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	acknowledge for Domains bigger or smaller than one country. For future: consider removing all references to legal tekst

		of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. We propose that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text. 3. A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not necessarily need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should replace, in its text, the notion of "national GO scheme" by simply referring to "GO scheme". This will not preclude a decision on this issue at a later date, as currently done within the text proposed.		
Nel Hydrogen	I strongly support to treat Hydrogen and (bio)gas as completely distinct energy carriers to be covered by distinct GO schemes. We need to mitigate any risk for hurting the credibility of the GO system. Furthermore I (would) welcome to replace everywhere "national GO scheme" by "GO scheme". For hydrogen there is still the opportunity to implement one single EU system.		Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU	Replace National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider

	Lastly, reference to the EU regulatory framework should be limited to the Foreword section, to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that), facilitating import of renewable energy and export of EU technology. Suppress reference to the EU regulatory framework in the standard body.		legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	removing all references to legal tekst
NET4GAS		We welcome the consultation of FastGO to bring forward our suggestion for amendments with regard to the FastGO proposal asking for a separate GO for Hydrogen (pure hydrogen) and a separate GO for gas (injected in a gas grid). Keeping one GO for gas with a specific attribute [Renewable Hydrogen], [Biomethane] or other like [Renewable Syngas], allowing to differentiate between the gas carriers, will avoid fragmentation of the gas market and hence maximize interchangeability/tradability for the new gases. In fact, this would be very similar to RE GO's which are sold on the electricity market as RE GO [wind], [PV] or [Hydro]. We believe that the FastGO proposal asking for a separate GO for Hydrogen (pure hydrogen) is not in the interest of a liquid market for Gas GOs and thus not in the interest of the energy transition of the Single Gas market in the EU. Therefore, we believe that keeping one GO for gas with a specific attribute will anticipate a better answer to needs of the gas market (both for pure Hydrogen as for mixed gasses) in the green transition faced in the years to come.	Call for support to liquid single gas market noted. The liquidity argument is not sufficiently argumented for adjusting the structure of the proposed system. The reference to the categorisation of electricity based on the energy sources is applicable on the current text proposal, which enables all gaseous energy carriers to be related to their energy source through the attribute 'source type' on the GO.	None

NITIU	We urge the FaStGO organsization to keep hydrogen as one stand-a-lone energy carrying media and not to incorporate the same as a sub-set.	It is of essence for the future development of a Green Deal as well as the the general reset of the Europena market to keep hydrogen separated from other carbon-based media.	Endorsement for separate hydrogen GO is noted	None
Nouryon	1) Strong support for identifying Hydrogen and Gas (from the grid, called Hydrocarbon gas in the standard) as separate and distinct energy carriers, covered by distinct GO schemes Indeed, there are influential parties from the Gas sector that are determined to have Hydrogen and Gas from the grid considered as the same energy carrier ("gas"), so that any "gas" GOs (GOs issued for hydrogen, as well as GOs issued for gas injected into the grid, such as biomethane) may be used indistinctly for any "gas" consumption (hydrogen supplied by any means from any source, or gas supplied by any means from any source). GOs issued for the production of biomethane could then be used to claim supply of Hydrogen of renewable origin, and GOs issued for the production of hydrogen (for any application, i.e. not injected in the gas grid) could be used to claim the supply of Gas from the grid of renewable origin. This will undermine the credibility of the GO system that is already under attack (for greenwashing). GOs are nonetheless essential for creating a market for renewable and/or low carbon hydrogen.	Replace "national GO scheme" by "national GO scheme" A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not need to be limited to one country, and for hydrogen there is still the opportunity to implement one single EU system (rather than a fragmented system as for biomethane GOs today). Although RED II puts Member States in charge of implementing GO schemes, this does not technically prevent MSs from designating joint Competent Bodies operating over a joint Domain. This concept is important for avoiding unnecessary impediments to cross border trade, keeping in mind that physical hydrogen supply chains of hydrogen are cross-border today (e.g. across Benelux, across France and Iberian Peninsula,…). Furthermore, RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). To be noted: If H2 and Gas can't have distinct GO schemes (see point above), then existing Domains and Competent Bodies for Gas will become the Domains and Competent Bodies for H2, and H2 will inherit the hurdles to cross border trade of renewable Gas experienced today.	Endorsement for separate hydrogen GO is noted. This is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier , and separate market behaviour for hydrogen GO.	Replace National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country.

Nvalue AG	We approve the proposal that we find very detailed and well-reasoned	We feel that a little more clarity is needed regarding the definitions of cancelation period, expiry period and disclosure period and their interaction. Furthermore, the topic of ex-domain cancellation for any countries, including countries outside of the EU and even Europe, shall be addressed.	to be balanced out against the concerns mentioned in the explanatory notes and the task 1.3 report	
Open Grid Europe GmbH	Open Grid Europe generally welcomes FastGO's approach to proposing a revised draft of standard EN16325. The proposed document appears to be a good starting point in the formal CEN/CENELEC process of standard revision. We believe that the technocratic approach taken by FastGo in proposing and justifying the necessary changes to the standard, in line with existing legal requirements in the EU, is the right approach in order to start the formal standard revision process within CEN / CENELEC. We welcome DG Energy's role in facilitating the work of FastGO and, by doing so, providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements. We believe this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness of the final version of the standard. 1. Open Grid Europe supports the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity		Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	Replace National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider removing all references to legal tekst

	(ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling. We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO schemes. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO scheme. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (e.g. from electricity to hydrogen, from Hydrogen to methane, etc.) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy value of the product that has been produced. A specific consideration for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG Blends) may be given in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes. We agree that there is no need, when H2 travels in H2 and NG blends for different GO's to coexist and only one GO (for Hydrcarbon gas) could be used However at a general level, only by			

	separating GO schemes between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed by the current version of the FastGO project) can a robust GO system be designed. 2. Open Grid Europe believes that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. As a result, the standard should be designed in a way as to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. We propose that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text. 3. A GO scheme, defined by a Domain (the geographical area over which it applies) and an Issuing Body, does not necessarily			

	need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should replace, in its text, the notion of "national GO scheme" by simply referring to "GO scheme". This will not preclude a decision on this issue at a later date, as currently done within the text proposed			
Plagazi AB	All other energy carriers like LNG, LPG, bio-gas or bio-diesel are adding CO2 to the atmosphere. Hydrogen is beside solar and wind energy the only energy carrier that does not contribute to the pollution of CO2. "CO2 neurtral" which is often used expression does not reduce the amount of CO2.		not clear what amendment is being proposed	-
POM Limburg	Hydrogen Europe generally welcomes FastGO's approach to proposing a revised	1. Hydrogen Europe supports the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity	Endorsement for separate hydrogen GO is	Replace National GO

	draft of standard EN16325, to be used as a starting point in the formal CEN/CENELEC process of standard revision. We believe that the technocratic approach taken by FastGo in proposing and justifying adequate changes, in line with existing legal requirements in the EU, is the right approach to beginning the formal standard revision process within CEN / CENELEC. We welcome DG Energy's role in facilitating the work of FastGO and providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements. We believe this approach will help speed up the process of standard revision significantly and will ultimately increase the quality and appropriateness of the final version of the standard.	(ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling. We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as distinct energy carriers and have their own, specific GO system. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. Energy Carrier conversion, between one carrier to another (e.g. from electricity to hydrogen, from Hydrogen to methane, etc.) must entail the cancellation of a GO of the product being consumed and the issuing of a new GO, corresponding to the energy product that has been produced. An exception for P2G facilities, which generate H2 from electricity for the purpose of injecting that H2 (in H2 and NG / Blends) could be envisioned in order to simplify administrative burden and facilitate the generation of Hydrocarbon Gas GO's with desired attributes. Only by separating GO systems between (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling, (as it being proposed) can a robust GO system be designed. 2. Hydrogen Europe believes that the revised standard should help build a robust system of Guarantees of Origin that works with the current EU legislative acquis, but is not limited to it. As a result, the standard should be designed in a way as to facilitate adoption of the standard by non-EU countries, and its replication as an international (ISO) standard (under existing agreements between CEN and ISO designed to facilitate that). This will facilitate import of renewable energy and export of EU technology. The current systematic	noted. For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider removing all references to legal tekst

		reference to EU directives in the definitions and in the body of the proposed draft standard constitutes an obstacle to implementation by parties outside of the EU. We propose that all references to existing EU legislation are deleted from the body of the standard and be included only as a technical annex or an introductory text. 3. A GO scheme, defined by a Domain (the geographical area over which it applies) and the Issuing Body, does not necessarily need to be limited to one country. While the current GO system is generally defined by national GO schemes, for hydrogen there is still the possibility to implement one single EU system. Although the RED II puts Member States in charge of implementing GO schemes, this does not technically prevent them from designating joint Competent Bodies operating over a joint Domain. As RED II cites facilitation of cross border trade as a fundamental purpose of GOs (recital 59). The standard should give the possibility to MS to agree on a implementing a single EU system, if they will choose to do so. (e.g. because it may serve the market better). The draft version of the standard should replace, in its text, the notion of "national GO scheme" by simply referring to "GO scheme". This will not preclude a decision on this issue at a later date, as currently done within the text proposed		
Port of Rotterdam	The port of rotterdam welcomes FastGO's approach to proposing a revised draft of standard EN16325.	we support the extension of scope of EN16325 to cover four distinct energy carriers: (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (iv) heating and cooling.	Thank you for the endorsmenet	none
Renewable Energy Association (Poland)	As an association, we express general support for the shape of the solutions provided for in the standard. we are of the opinion that it is important not to introduce further restrictions on the freedom of trading and the cancellation of guarantees of origin. Freedom in that		The text proposal facilitates cancellation by other parties than suppliers.	None

	system includes allowing both producers, that we represent, as well as other market participants to be a part of any local registries in order to enable buying, selling and delivering GoO's directly to any end consumers or wholesale market participants. For example deliveries or cancellations to the end client should be allowed to be done by the renewable energy producer regardless if that client is being supplied with power by the producer directly via the contract or not. The above applies in particular to issues related to the specificity of new energy carriers for which guarantees will be issued, such as heat and cold energy and gas from renewable energy sources.			
Slovak Hydrogen Association	he Slovak Hydrogen Association agrees with FastGO's proposal to extend the EN16325 standard to hydrogen and to include it in a separate category with electricity, gas, heating and cooling. A specific category of hydrogen is the best way to meet the principle of transparency, to ensure transparent information on hydrogen GO to the final consumer. The method of hydrogen production and its end use is diametrically different from hydrocarbon gases, therefore it requires a separate and separate GO system.	As the possibilities for low-carbon hydrogen production in the EU are limited, the EU will have to cover the future increased demand for hydrogen from imports outside the EU in the medium term. Today, Slovakia is a transit country for gas from Russia, but the capacity of the pipeline is becoming less and less full. The operator of the Slovak transit gas pipeline is considering a pilot project to modify one of the six transmission pipelines to transport pure hydrogen from Ukraine to the EU. The revised standard should, therefore, help to build a reliable system of guarantees of origin that will also work outside the EU. The ISO format will help facilitate the import of renewable hydrogen and strengthen the export of technology from the EU.	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier. Call for support to international (outside EU) framework noted.	None
Snam	A generic endorsement as I have some doubts about specific provisiones envisaged in the draft proposed		Noted.	None

Statkraft	- Cancellations to be widened to non suppliers is a key change that we can support as it widens the customers ability to chose where their electricity originates. Current method is restrictive and harmful to free trade throughout Europe, creating captive markets.	Clarity on Bodies - Competent vs. Issuing seem to be mixed up - would be better to have substantially different words to avoid FastGo mixing these terms up and reflect that national schemes differ throughout Europe.	An issuing body is a specific type of competent body. Cancellation by non-suppliers is facilitated (not enforced, as disclosure is up to national regulation)	None
STX Services B.V.	In STX we actively support the development and extended use of GoO's, whether it's for the electricity, gas, hydrogen, heating or cooling market. We strongly believe that further development towards a "full disclosure" is needed in order to have a fully functioning and rational mechanism for documenting the source of the energy being used, regardless of the market. In addition, every change that supports free unrestricted trade and equal possibilities for all of the market players will be always supported by us. Especially as mentioned in the explanatory note point 2.4.1 about "Extending the definition of Disclosure beyond suppliers" we want to support it, as we see it extremely important to cover and unify an ability to perform cancellation by any participant, in any local registry, by holding an account in it. Our general view is that all market participants shall have the possibility to		The reason why the current text proposal doesn't facilitate Ex Domain Cancellation (EDC) as a general practice, is that the national disclosure supervision is not set up to take such into account, for which there is a risk of double disclosure and mistakes in the calculation of the residual mix. EDC inside Europe would require an overarching European regulatory approach and system management.	None

	open local registries and be able to make use of them without additional limitations. Those limitations are such as but not only: holding a local power trading license, being a locally registered entity / spv or being a direct power supplier to the client requesting the GoO's. In our opinion those restrictions greatly limit the growth of the markets and stand in contradiction to free competition. Basing on example: we see that large corporates with presence in several countries within the EU want to be able to track their energy consumption themselves by using GOO and in most cases following the CDP protocol (or other guidelines). If the EU directive will state that cancellation needs to be done via the local registry in the country of consumption (if available) and will exclude ex-domain cancellation, this will be against EU competition laws. It will give local energy suppliers an exclusivity to selling GOO's to end consumers in their respective markets. Going further there are currently several local restrictions that exclude foreign (EU) competition: 1. In some countries (like Germany), the cancellation of the GOO has to be			

	done via the energy supplier. For large corporate that buys energy directly from the wholesale market this is not even possible. It also excludes any competition from other suppliers, let alone international market participants 2. In some countries, market participants are only allowed to open a registry account if they (i) have a local legal entity (ii) are a local energy suppliers. In order to ensure a level playing field, all GOO market participants should be allowed to trade GOO within the EU borders within restrictions. If this is not ensured in legislation, extra domain cancellation should be allowed for and all of those matters should be also described and allowed in the standard.			
tt			-	
TTK	I fully agree with the proposed EN16325 standard on guarantees of origin. Hydrogen is an independent energy carrier. It can be prepared from renewable energy sources, can be stored, transported and used in electrochemical devices, i.e. in several types of fuel cell technologies (PEMFC, SOFC, MCFC, PAFC, etc.) for combined heat and power applications and can also be used in innovative combustion technologies. It is hardly possible to prepare synthetic gases without hydrogen. Even ammonia			

	production but also synthetic methane is dependent on hydrogen. It has to be emphasized that energy conversion steps obviously take place with energy loss. Therefore, it in not worthy in each case to convert hydrogen to synthetic fuels, concomitant with efficiency loss. Hence, hydrogen is not a simple intermittent species between electricity and other synthetic fuel, but an independent energy carrier with significant advantages in sectoral integration.			
TUVRheinand	In that case we take into the safety aspect of the hydrogen, our proposal would be different aspect and different legal handling of hydrogen.	Safety of hydrogen can be settled in another standard. However essential for operation, and broad roll-out, it is another policy area than art. 19 of REDII.		none
UBA	The standard proposal reaches to far into areas which are not covered by RED II, for example the field of disclosure.	Stay strict the content of RED II. That means the proposal should not include rules concerning disclosure.	The text proposal aims to strengthen the credibility of the use of GOs by integrating some basics on the surrounding disclosure framework. It doesn't go into details which would ideally be complemented by the legislative framework. Your argument for not touching upon the disclosure system is missing.	None.
Ukraine Hydrogen Council	Ukraine Hydrogen Council supports the extension of scope of EN16325 to cover four distinct energy carriers: (		Endorsement for separate hydrogen GO is noted	None

	1. Electricity 2. Hydrocarbon gas 3. Hydrogen 4. Heating and cooling. We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO systems.			
WaterstofNet	We strongly support the current categorization of the different energy carriers, with hydrogen and hydro-carbons being considered as distinct carriers that cannot be combined into one single GO-category. Using GO's issues for hydrogen to claim supply of renewable gas and vice versa would lead to a very non-transparent situation and would undermine the credibility of the system. A clear and distinct GO market for hydrogen is required to stimulate the hydrogen market and the development of substantial hydrogen production capacity in the future. Having distinct GO schemes for hydrogen versus hydrocarbons will stress their specific characteristics and applications and will create maximal development opportunities for both markets.	The document is very much focused on the EU territory, with multiple references to EU directives in all definitions. It is important that to enable future adoption of the standard to non-EU countries, such that all forms of renewable energy can be traded over the EU borders. The standard should be designed in such a way that it can easily be translated into an international standard.	Endorsement for separate hydrogen GO is noted, this is understood as an endorsement for consumer distinction of hydrogen as separate energy carrier . For making the standard copiable outside EU, the references to EU legislation should be replaced by the corresponding legal text. Given the European legislative framework on GOs and disclosure still being subject to potential further updates during the adoption years, for now the FaStGO text proposal doesn't go in there yet.	Replace National GO Scheme by Domain GO Scheme to acknowledge for Domains bigger or smaller than one country. For future: consider removing all references to legal tekst
Vattenfall	Vattenfall welcomes FaStGO's approach to revise the EN16325 Standard. We fully support the efforts aimed at reinforcing consumer trust in the GO system.	Vattenfall suggests to assign one European issuing body for all GO-types. This enables alignment of GO handling and more coherence in the (European) GO-market. The methodology and handling of the GOs should be implemented in a		

	We support the ambitious decision to standardise as many features of a GO where appropriate (e.g. not for heating and cooling due to its local character) as possible in order to ensure harmonisation across the EU that can facilitate cross-border trade. Standardisation is key to create liquid markets that are capable of forming clear and adequate price signals. In this context we are happy to support the standardisation of a fixed deadline for GO cancellations across the EU. We believe that establishing a GO scheme that ensures unrestricted cross-border trading is of key importance for the efficiency of the entire system. Furthermore, we welcome DG Energy's role in facilitating the work of FaStGO and, by doing so, providing CEN / CENELEC with a working document that is already aligned with the majority of EU requirements and legislation. Vattenfall supports the extension of scope of EN16325 to cover the following distinct energy carriers: (i) electricity (ii) hydrocarbon gas and (iii) hydrogen. Consequently, we fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO schemes. A robust system of Guarantees of Origin requires that energy products which are interchangeable have to be treated as	coherent way. Vattenfall believes this can be done most effectively in case of a one stop shop for (i) electricity (ii) hydrocarbon gas, (iii) hydrogen and (v) renewable gas. A common European issuing body can act as a point of contact for all GO-types, safeguard the application of one common set of rules and obligation, increase transparency by providing easier access to data and understanding of the GO-market.		

	distinct energy carriers and have their own, specific GO scheme. Hydrogen and Hydrocarbon gases are distinct energy carriers, with different production methods, uses and characteristics. When it comes to validity of a GO, we support the general need to standardise as many rules as possible. Next to validity of a GO Vattenfall welcomes the effort of the FaStGO-project to harmonise rules on the issuance and cancellation of the GOs at EU level when revising the EN16325 Standard. Currently issuance and cancellation requirements differ across European Member States. Where some Member States enforce monthly handling of GOs, in other countries yearly handling of GOS is sufficient. Regarding "5.1.4 Additional provisions for High-Efficiency Cogeneration Electricity" there is no need for specific requirements and therefore 5.1.4 can be completely deleted due to double regulation with already existing EED. • Requirements for GO of high-efficiency Cogeneration Electricity are already and sufficiently laid down in Art. 14 (10) and Annex X of the EED. • The calculation method laid down in Annex II EED (s.c. Finish Method) is valid for the for calculation primary energy savings which is required for the purpose of the EED and Annex II, but not for			

	distributing the produced energy from CHP between electricity and heat. The requirements propose in 5.4.2 b3 and b4 and repeated in 5.4.4. a3 and a4 on temperature categories and pressure levels add on unnecessary and bureaucratical efforts to every heating and cooling supplier with no or very little use for customer's information needs. We propose to delete those requirements. Inspection requirements should be equally designed for all energy carriers. For heating and cooling mandatory inspection "of a Production Device of Heating or Cooling by a Production Auditor" is required. In contrary to hydrogen inspections the "production auditor" is not explicitly mentioned. It should be taken into consideration to make use of the normal annual auditing processes a heating and cooling supplier is doing in the course of the annual financial statement routines.			
Vertis Environmental Finance Ltd	equal access to GO registries and GO cancellations for ALL market participants...not just for power suppliers	it is insane that cancellation in one AIB memberregistry for consumption in another AIB state is not possible. It is all only data so surely it can be transferred, swapped, shared and exchanged.	Equal access by all parties to registries is facilitated, not enforced as such would require adaptations in the EU regulatory framework on disclsoure. Cancellation of GOs to other countries requires	None

			measures for reliable disclosure governance.	
Worley	We fully endorse the separation between Hydrogen and Hydrocarbon gases as two distinct energy carriers which require specific GO schemes.	N/A	Endorsement for separate hydrogen GO is noted	None

3 Article-specific reactions to the FaStGO text proposal of 25th May 2020

Organisation	Paragraph	Comment	Alternative Text proposed	FaStGO response	Amendment
Association ECS Switzerland	1	The regulations of EN 16325 have to be set in such a way, that not only existing GO-related directives or similar can be served but all underlying relevant GO-regulations (including GHG-Protocol etc.). Therefore in the proposed EN 16325, §1, the wording „inter alia and not exclusively" and „other relevant provisions related to Guarantees of Origin" has to be included	"This European Standard specifies requirements for Guarantees of Origin of Electricity, Hydrocarbon Gas, Hydrogen, and Heating & Cooling. This standard will establish the relevant terminology and definitions, and requirements for the registration, issuance, transfer and cancellation of GOs in line with inter alia and not exclusively the following directives: Renewable Energy Directive	The standard can not determine to whom it is applicable. It is up to those other regulations to determine whether they make use of the regulations under this standard. Would be great if GHG protocol makes use of this as well, indeed.	none

			(2018/2001/EU), the Directive on common rules for the internal market for electricity (2019/944/EU), the Directive on Energy Efficiency (2018/844/EU) and other relevant European Union law as well as other relevant provisions related to Guarantees of Origin. This standard will also cover measuring methods and auditing procedures. Out of scope of this European Standard is GO recognition by Member States." Also in the Text "0. Introduction,		

			0.1 General" this has to integrated		
Eurogas	0.1	Risk of conflicting wording with RED 2	Delete "A GO is an instrument for proving the origin of supplied energy to a final customer." Or swap with legal	The introductory text is not binding and is meant as descriptive as possible. Therefore we do not see the need to align this further with REDII	None

			text of Art 19 Red 2		
Eurogas	0.1	Comply with Art 19 RED 2	Add after "cooling": "In MS where GOs are issued for energy from non-renewable sources it applies to other sources as well."	Would add the proposed sentence after the current text: *The content of this standard can also be applied for energy from non-renewable sources*	Add sentence proposed
Eurogas	0.1	Comply with text of RED 2. And Increase efficiency of GO system through avoiding GO conversion when injecting hydrogen into gas network: limit energy carriers to el, gas, h&c. Distinguish different gaseous carriers later by production device, energy source etc.	Replace "Hydrocarbon Gas, Hydrogen" with "Gas, including hydrogen,"	this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon. In the specific case when hydrogen would be transpored by vehicle to an injection point in a gas grid, we understand that conversion issuance will increas credibility to consumers. This special type of conversion can be made administratively light.	none
EnBW Energie Baden-	0.1	According to RED II a GO can also be drawn up for non-renewable energies The CEN committee shall		Thank you for the endorsement	None

Württemberg AG		standardise in EN 16325 the GO for renewable energies and non-renewable energies.			
EnBW Energie Baden-Württemberg AG	0.1	EN16325 should standardise a GO for Electricity, Gas and Heating/Cooling and not seperate hydrocarbon gas and Hydrogen. The specifications of hydrogen should be included into the gas-GO. Rationale: • this follows the formulation of RED II, Art 19 Art. 7b • creating an own H_2-GO bears the risk of a scattered GO market (some countries may have H_2-GO, others may not) •If specification of H_2 is desired for marketing purposes, this may be done by additional data fields	Change the wording: This European Standard specifies requirements for Guarantees of Origin from the renewable energy sources Electricity, Gas including hydrogen, and Heating & Cooling. Hydrogen should keep an extra subsection in section 5 to account for its special standardisation requirements.	1) formulation of 'gas (including hydrogen)' in REDII 7b turns out to be interpreted contradictory by different parties, so we turn towards arguments on impact and consumer trust. 2) scattered market: not clear what is the problem: the consumer of pure hydrogen can receive a cancellation of a pure hydrogen GO while the consumer from grid-gas can cancel a HC gas GO. A consumer can cancel a HC gas GO origination from H2 technology, as this remains visible on the GO. The differences between the markets of the physical products (gas from the grid versus pure hydrogen) are acknowledged to maintain consumer credibility. 3) is not an argument but a mitigation proposal. Mitigations can indeed be done in such direction, just the leading principle for FaStGO is consumer credibility and transparency, for which it is essential that the GOs are cancelled for the same energy	none

				carrier and type of gas as the type of gas actually consumed.	
Eurogas	0.2	Not sure if this reflects actual process	Delete "by a final customer"	Agreed	Added in 0.2 that Gos can be cancelled by/for a final consumer
Eurogas	0.2	Irrelevant: general description of GO issuing, transfer etc. without standardizing effect is helpful but should be provided by separate guidance document.	Delete full clause. If not supported, delete references to EECS and AIB.	Deleted	Section with AIB, ERGaR and Hinicio deleted

BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	0.2	The current draft contains sentences that suggest a link or function of GOs with regard to energy infrastructure. However, in the book & claim principle, a GOs is decoupled from the energy system. Therefore, nei-ther transport, storage nor conversion of energy needs to be consid-ered. Rationale: • Art 19 (6) does not mention any link of GO to energy infrastructure. • GOs are only supposed to be "issued, transferred and cancelled elec-tronically" – no mentioning of storage or conversion in RED II. • RED II, Art. 19 (2): "a guarantee of origin is issued in response to a request from a producer of energy from renewable sources," ⇒ A GO is issued for production of energy, not for cancellation of another GO (=conversion)	Misleading formulation, eg: • the purpose of a guarantee of origin (GO) system is to track the attributes of a given megawatt-hour of produces renewable en-ergy from generation/ production to consumption. • include an alternative image for GOs • explain in more detail the inclusion/use of "storage" in the standard • do not allow to cancel GOs for "greening" energy supply from public grids for generation of GOs.	The introductory text is not binding and is meant as descriptive as possible. It is not stated that GOs are linked with the energy infrastructure and in principle GOs are already issued for energy conversion (e.g. use of biogas for electricity production). Therefore we do not see a conflict with REDII	Change Figure 2 caption separate to decoupled

		The standard should avoid the impression that energy is transported with the transfer of GOs or GO have a relation to energy transport.			

BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	0.2	EN16325 should standardise a GO for Electricity, Gas and Heating/Cooling and not separate hydrocarbon gas and Hydrogen. The specifications of hydrogen should be included into the gas-GO. Rationale: • this follows the formulation of RED II, Art 19 Art.7b • creating an own H_2-GO bears the risk of a scattered GO market (some countries may have H_2-GO, others may not) •If specification of H_2 is desired for marketing purposes, this may be done by additional labels (see request below).	Change the wording: 1 Scope "This European Standard specifies requirements for Guarantees of Origin from the renewable energy sources Electricity, Gas, and Heating & Cooling." Hydrogen should keep an extra subsection in section 5 to account for its special standardisation requirements. Introduce a new definition: 3.1.28 Gas including Hydrogen Energy Carrier used in gaseous state and compliant with the technical specifications of	1) formulation of 'gas (including hydrogen)' in REDII 7b turns out to be interpreted contradictory by different parties, so we turn towards arguments on impact and consumer trust. 2) scattered market: not clear what is the problem: the consumer of pure hydrogen can receive a cancellation of a pure hydrogen GO while the consumer from grid-gas can cancel a HC gas GO. A consumer can cancel a HC gas GO origination from H2 technology, as this remains visible on the GO. The differences between the markets of the physical product are acknowledged to maintain consumer credibility. 3) The suggested definition doesn't suffice: the REDII doesn't allow for limiting to gases that are injected into the grid. If a producer of a gas that is not injected into the gas grid sends an Issuing request for GOs to an Issuing Body, the IB is obliged to issue them. However the proposed text for EN16325 fully facilitates this segment you propose. With your proposed definition, the gas GO issuance would be limited to gas-grid injection. Our text proposal treats that as a full segment exactly with	None

			gas transmission and distribution networks.	the functionalities you propose. In the proposed energy carrier 'Hydrocarbon gas' with type of gas = 'network-compatible gas', it facilitates all gases that are injected into the gas grid.	
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	0.2	The description of the Guarantees of Origin should be kept completely general (renewable and non-renewable energy).	Make clear that this standard can also be used for renewable and non-renewable energy.	That is the intention indeed. Some separation is made due to gaseous energy carriers where renewable energy is actively produced whereas fossil energy is often "extracted". Furthermore, Article 19 separates renewables as the only mandatory GO system. However, in principle there should be nore difference per energy source and if the current proposal suggests to this direction, it should be corrected. The intention is to keep the standard as generic	The content of this standard can also be applied for energy from non-renewable sources.

				accross energy sources as possible.	
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	0.2	"These GOs can then be traded until they are cancelled by a final customer." Not the customer, but the last energy supplier is cancelling the GO.	Change the sentence in: "These GOs can then be traded until they are cancelled by a final customer or energy supplier."	Agreed	Added in 0.2 that Gos can be cancelled by/for a final consumer
EnBW Energie Baden-Württemberg AG	0.2	Other means than GOs are mentioned for biomethane: mass balancing (ERGaR)	Change to: "RED II introduced GOs as the instrument for disclosure of renewable energy origin."	Whole paragraph deleted related to comments of others who felt EECS could not be credited for the two decades of work that are copied into this standard.	
EnBW Energie Baden-Württemberg AG	0.2	The description of the Guarantees of Origin should be kept completely general (renewable and non-renewable energy).	Make clear that this standard should be used for renewable and non-renewable energy.	That is the intention indeed. Some separation is made due to gaseous energy carriers where renewable energy is actively produced whereas fossil energy is often "extracted". Furthermore, Article 19 separates renewables as the only mandatory GO system. However, in principle there should be nore difference per energy source and if the current proposal suggests to this direction, it should be corrected. The intention is to keep the standard as generic	The content of this standard can also be applied for energy from non-renewable sources.

				accross energy sources as possible.	
EnBW Energie Baden-Württemberg AG	0.2	"These GOs can then be traded until they are cancelled by a final customer." Not the customer, but the last energy supplier is cancelling the GO.	"These GOs can then be traded until they are cancelled by a final energy supplier or a final customer."	Agreed	Added in 0.2 that Gos can be cancelled by/for a final consumer
3Degrees Group, Inc.	0.2 - Account Holder Registration	This language does not adequately convey the need to expand the "definition of disclosure beyond energy suppliers" as is stated as a goal in the Explanatory Notes.	Remove: "Some countries may, at their discretion, limit access to the GO registry further to e.g. to energy market actors alone." Replace with: "Countries should not place undue restrictions on access to or use of the GO registry that would impede the efficient cancellation of GOs by or on behalf of end-use consumers,	The intention of the proposal is to enable cancellation by other parties than energy suppliers. However, due to the fact that the original aim of GOs is electricity disclosure by energy suppliers, such restriction may be allowed, but not enforced EU-wide	None

			e.g. countries should not limit the ability to cancel GOs to only electricity suppliers.”		
ENTSOG	0.2 Description of the Guarantee of Origin system …	The wording is not clear and might be confusing.	Delete 'face' in this fragment: GO issuing... Each GO represents a [face] value of 1 MWh of energy and the information content of a GO...	True, it is misleading	Word "face" was deleted
Becour	0.2 Description of the Guarantee of Origin system and its components	In the paragraph on the basic description of the GO system and its components there is no comments on the fact that GOs also create incentives for the producers to produce (more) renewable energy by an extra income generated by the sale of the GOs. It seems that this is an important aspect as this is the reason why producers are interested to join the GO system.		Additionality of Gos is a sensitive topic, but it is true that something should be added on the underlying purpose.	Add sentence to introduction: The underlying goal of GOos is to facilitate consumer choice, which indirectly could act as an incentive for

					renewable production.
ENTSOG	0.2 Description of the Guarantee of Origin system and its components	The Standard should also be applicable to decarbonised and low-carbon gases produced from non-renewable energy sources which needs to be clearly indicated in its text and wording. This will help Member States, which will decide to extend the GO system to non-renewable gases, to design it in accordance with RED II and following the best practices reflected in the GO Standard.	Basic description of the GO system and its components …. In turn, this enables those final customers to choose to consume/use energy from renewable sources [or to consume/use decarbonised and low-carbon energy]. … These basic components ensure accurate attribute tracking and the avoidance of double disclosure; when the same unit of (renewable [or decarbonised/ low-carbon]) energy is disclosed more than once.	not opposing the addition, but as the GHG data field is optional, this can also be confusing	none as long as GHG data field is optional

			GO Cancellation … An Account Holder who performs a Cancellation unambiguously designates the sold/consumed energy to which the Cancellation relates. This may imply a certain (renewable [or decarbonised/low-carbon]) energy product or the generic mix of a supplier in a given year….		
AGCS Gas Clearing and Settlement AG	0.2 Description of the Guarantee of	This paragraph should be deleted. The text of the standard should be completely neutral, independent of any	This paragraph should be deleted.	Deleted	Section with AIB, ERGaR and Hinicio deleted

	Origin system and its components Paragraph 5	organisation, any developed scheme or any IT-system. It should be valid for many years and thus neutrality is of importance.			
AGCS Gas Clearing and Settlement AG	0.2 Description of the Guarantee of Origin system and its components Paragraph Energy disclosure and residual mix	This paragraph lacks the connection to the gas sector as it only refers to electricity and heat.	None	The reason is that there is no legal basis for disclosure of energy origin of gas as is the case explicitly for electricity and to some extent for gas	Added sentence in 0.2: No requirement exists for disclosure of the energy origin of gas
German Energy Agency (Deutsche Energie-Agentur, dena)	0.2 Description of the Guarantee of Origin system and its components: Section	Having low volumes of gas GOs circulating does not necessarily mean that the energy supply not covered with respective GOs can be considered to originate from fossil energy sources. The assumption made in the Standard's text is not true for gas.	We suggest to delete the entire paragraph 4 "For some energy carriers, as long as there are low volumes of GOs in circulation, the origin of all energy supply that is not	if it confuses more than it clarifies, it can be deleted	deleted as suggested

	"Energy disclosure and residual mix". Paragraph 4.		covered by GO cancellation can be considered to originate from fossil energy sources."		
Gaz Réseau Distribution France (GRDF)	0.2, section "GO Issuing"	In case of biomethane, a GO can mention more than on Source Type. This energy is produced thanks to a mix of different feedstocks, for example 50% of agricultural residues and 50% of biowaste. Create 100% biowaste GOs for 50% of the MWh produced and 100% agricultural residue GOs for 50% of the MWh produced won't be exact. The MWh produced are a mix of those two feedstocks, so each GOs are a mix of those two feedstocks. Moreover, if we mention on the GOs the GHG emission value on the production, we can't only mention on 100% biowaste GOs only the GHG emission value of this feedstocks as MWh	Specify in this paragraph that a GOs that mention only energy source is only an option or not applicable to hydrocarbon gas.	Gos are issued for each energy input in proportion of their energy content. This is an essential design criterion of an efficient transfer system: a GO buyer can select x GOs of source type y. also for publishing statistics of and across member states, this is much more market facilitating. An optional data field is added to the HC GO that allows for mentioning in addition the mixture of the inputs	none

		of biomethane attested by GOs is a mix of 2 feedstocks. That will lead to give to final consumer a wrong information.			
German Energy Agency (Deutsche Energie-Agentur, dena)	0.2. Description of the Guarantee of Origin system and its components: paragraph 5	This part must be deleted because it refrains the Standard from being a neutral document. One of the main goals of a Standard is not to favor or promote any institution or specific organization (in this case, AIB, ERGaR and CertifHy).	None. Delete paragraph 5 in section 0.2.	Deleted	Section with AIB, ERGaR and Hinicio deleted
German Energy Agency (Deutsche Energie-Agentur, dena)	0.2. Description of the Guarantee of Origin system and its components: section "Energy disclosure and residual mix".	This section refers to electricity and heat only. It should therefore be made clear that there are still no EU regulations regarding the designation of a gas mix.	Regarding gas mixtures, there is still no EU regulation in place to guarantee the origin of gases. Hence, the revision of this Standard is necessary to be able to disclose the origin of gases to end consumers.	The reason is that there is no legal basis for disclosure of energy origin of gas as is the case explicitly for electricity and to some extent for gas. However No requirement exists for disclosure of the energy origin of gas today, the standard induces some basic requirements, and such may come in the future, on which the standard should still apply.	none

	Paragraphs 1 and 2.				
German Energy Agency (Deutsche Energie-Agentur, dena)	0.2. Description of the Guarantee of Origin system and its components: section "GO Cancellation"	In this section it could be explicitly clarified that the cancellation of a GO does not enable or include the following: - A claim on GHG reduction - A claim of crediting the renewable energy included in the GO towards national targets This would help to end discussions about these topics.	The cancellation of a GO will not allow for the following: - A claim on GHG reduction - A claim of crediting the renewable energy included in the GO towards national targets.	Thank you. On targets, the directive is very clear on this and there isn't a need to address it in the standard. On GHG reduction, while it is true that Guarantees of origin should be clearly separated from emission offsets and other emissions trading instruments, which incorporate a guaranteed emission reduction against a set baseline, writing this in the standard could create more confusion than standardization as it is not stated anywhere that GOs could be considered as offsets.	None
Eurogas	0.3	Irrelevant, see above	Delete full clause	The introductory text is not binding and is meant as descriptive as possible. Therefore we do not see the need to align this further with REDII	None
GRTgaz	1 (scope)	replace hydrocarbon gas by gas.		this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none

HAMBURG INSTITUT	1.3	The FaStGO task 1.3 mapping study discussed the risk that trading GOs across heating and cooling grids which are not physically interlinked may be viewed as non-transparent and not credible by con-sumers. In Germany, even the marketing of green electricity products using electricity GOs has been subject to an intense "greenwashing" debate which is not overcome yet. In our view, there is a real risk that such a debate could create lasting damage to the credibility of a heating and cooling GO scheme. As a result, ensuring the transparency of the information displayed on GOs and associated marketing claims is of vital importance.		we acknowledge this problem. Hard to go further in restricting EU legislation by means of a standard in this respect, but a note added that a national GO scheme could do so. We added a note to policy makers in the consultation report.	none
ACT Commodities	2.3.	When specifying 12 months expiry, I think it should be clearer in saying 12 calendar months as countries also have different periods of what 12 months is		This might conflict with the directive wording in some cases	None

ACT Commodities	2.4.2	Only accepting Third Country GOs if there is an agreement	Third Party GOs can be accepted if they have been sold on a forward prior to 1/1/2021	standard is legally not binding untill that date (if at all adopted by then)	None
ENTSOG	3.1.15 Conversion Issuance	If the final version of the draft of the Standard keeps two types of GOs (for Hydrocarbon gas and pure Hydrogen), we propose changes to ensure that conversion of Hydrogen GO into Hydrocarbon GO is possible (i.e. in case of injection into a gas network, where production of a new energy carrier does not occur).	Change 'produced' into 'resulted' and add what is in brackets [ ]. 3.1.15 Conversion Issuance The Issuance of a GO for Output [produced] from Energy Carrier Conversion, and [(where applicable)] for which GOs representing the Attributes of the Input to that Production Device have been cancelled.	Agreed with the principle. 1) your suggestion "resulted" indeed makes it wider applicable to the H2->HC conversion in generic terms, thanks. 2) The concept of conversion issuance is dependent on the condition of cancellation, therefore "where applicable" undermines the goal. When not related to cancellation of GOs, it is normal GO Issuance. See 5.2.5 of the FaStGO text proposal.	3.1.15 Change 'produced' into 'resulted'
Fingrid Oyj	3.1.18	This definition should be in the national legislation, a standard cannot define tasks for a body in a Member State	Disclosure defined in the national legislation	The definition is introduced to use it furhter in the text, not aiming to assign tasks. It is true that for example not all of Competent	add the tasks of CB for disclosure as examples: add 'charged with 'supervision

				bodies for disclosure may apply penalties or calculate the RM.	of origin disclosure, e.g.'
Eurogas	3.1.21	Comply with text of RED 2. And Increase efficiency of GO system through avoiding GO conversion when injecting hydrogen into gas network: limit energy carriers to el, gas, h&c. Distinguish different gaseous carriers later by production device, energy source etc.	Replace "Hydrocarbon Gas and Hydrogen" with "Gas, including hydrogen,"	this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none
GRTgaz	3.1.22	replace hydrocarbon gas by gas		this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none

ENTSOG	3.1.22 Energy Carrier	The definition of the energy carrier might be confusing as it refers to the means of conveyance (which may encompass pipelines, grids etc.). We also suggest changing terminology throughout the draft: from 'Hydrocarbon Gas' into 'Gas' (see the explanation below).	Delete what is in brackets [ ] and change 'Hydrocarbon gas' into 'Gas' 3.1.22 Energy Carrier a substance or phenomenon that can be used to produce mechanical work or heat or to operate chemical or physical processes [and the means by which it is conveyed]; used in this document to collectively refer to Electricity, Heating, Cooling, [Gas], and Hydrogen.	this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none

ENTSOG	3.1.23 Energy Carrier Conversion (or Conversion)	If the final version of the draft of the Standard keeps two types of GOs (for Hydrocarbon gas and pure Hydrogen), we propose some changes to ensure that conversion of Hydrogen GO into Hydrocarbon/Gas GO is possible (i.e. in case of injection into a gas network, where production of a new energy carrier does not occur).	Add what is in brackets [ ] 3.1.23 Energy Carrier Conversion (or Conversion) The production of an Energy Carrier from one or more Inputs including at least one other Energy Carrier [or other operation with an Energy Carrier requiring specific changes in the GO format explicitly stated in this Standard (see 5.2.7)].	agreed with the principle, we see this principle already ensured with the current text. As the definition is about creating a general understanding of the concept, that is not the place to ensure this specific case. Rather in section 5.2 the concept of 5.2 is furhter specified to reassure the principle you mention.	none
Eurogas	3.1.25	terminology	Replace “that flows” with “injected”	Agreed	Changed "that flows" with "injected" in energy storage definition

BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	3.1.26	The definition of Energy Storage is actually the definition of stored En-ergy and not the definition of the actual device or system that stores energy.	Include definition of stored energy according to the existing defi-nition of Energy Storage: Stored Energy Energy that is stored in a device or system for which the Energy Carrier that flows into that device or system is the same as the Energy Carrier that flows out of it Edit the Energy Storage definition: Device or system that is used to store energy. The Energy Carri-er that flows into that device or system is the same as the Ener-gy Carrier that flows out of it	You are right. Thanks for pointing out.	Stored Energy Energy that is stored in a device or system for which the Energy Carrier injected into that device or system is the same as the Energy Carrier that flows out of it And edit the Energy Storage definition: Energy Storage Device or system that is used to store energy, where the energy carrier injected into that device or system is the same as the Energy Carrier that flows out of it

			Energy Storage Device or system that is used to store energy, where the energy carrier that flows into that device or system is the same as the Energy Carrier that flows out of it.		

EnBW Energie Baden-Württemberg AG	3.1.26	The definition of Energy Storage is actually the definition of stored Energy and not the definition of the actual device or system that stores energy.	Stored Energy Energy that is stored in a device or system for which the Energy Carrier that flows into that device or system is the same as the Energy Carrier that flows out of it And edit the Energy Storage definition: Energy Storage Device or system that is used to store energy, where the energy carrier that flows into that device or system is the same as the Energy Carrier that flows out of it	You are right. Thanks for pointing out.	Stored Energy Energy that is stored in a device or system for which the Energy Carrier injected into that device or system is the same as the Energy Carrier that flows out of it And edit the Energy Storage definition: Energy Storage Device or system that is used to store energy, where the energy carrier injected into that device or system is the same as the Energy Carrier that flows out of it

ENTSOG	3.1.26 Energy Storage (or Storage)	It is not reasonable to define Energy Storage through energy carrier stored therein. Energy Storage could be considered either as a process or a facility (device).	New wording 3.1.26 Energy Storage (or Storage) Device or system used for the stocking of Energy Carrier for which the Energy Carrier that flows into that device or system is the same as the Energy Carrier that flows out of it.	You are right. Thanks for pointing out.	Stored Energy Energy that is stored in a device or system for which the Energy Carrier injected into that device or system is the same as the Energy Carrier that flows out of it And edit the Energy Storage definition: Energy Storage Device or system that is used to store energy, where the energy carrier injected into that device or system is the same as the Energy Carrier that flows out of it
Eurogas	3.1.28	Export meters do not necessarily mark a point of potential trading or title transfer.	Replace "flowing from a Production Device to the point where the Output is to be made available	This could be changed, in correspondence with the concept of tradeable GOs	Consider deleting the last words of the definition, in correspondence with replacement measures for the concept of

			for trade." by "from a Production Device to a "transport or transmission system".		Tradeable GOs, for which the definition of Export meter becomes: 'One or more device(s) and supporting arrangements for determining (in whole or in part) the quantity of Output flowing from a Production Device'
Eurogas	3.1.28	Comply with text of RED 2. And Increase efficiency of GO system through avoiding GO conversion when injecting hydrogen into gas network: limit energy carriers to el, gas, h&c. Distinguish different gaseous carriers later by production device, energy source etc.	Delete "hydrocarbon". Delete "consisting of chemical compounds composed mainly of the elements of carbon and hydrogen,"	this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none
Fingrid Oyj	3.1.28	Keep the current definition, there is no chance in the directive concerning this item. Definition of trade is not	Export meter is measuring nett energy of a production unit.	This could be changed, just 'a distribution or transmission system' does noet systematically apply for all energy carriers. Different wording is needed for	Consider deleting the last words of the definition, in correspondence with replacement

		clear. For energy carrier conversion correct export meter definition is needed, this definition is not possible for conversion.		heating and cooling and for hydrogen	measures for the concept of Tradeable GOs, for which the definition of Export meter becomes: 'One or more device(s) and supporting arrangements for determining (in whole or in part) the quantity of Output flowing from a Production Device'
ENTSOG	3.1.3 Affiliate	The definition of the 'Affiliate' refers only to electricity market. If it is also relevant for the gas market, we suggest changing the text accordingly.	Add what is in brackets [ ]. 3.1.3 Affiliate A stakeholder assigned by the expression "related undertaking" by the IEM Directive (in relation to the electricity market) [and Directive (EU) 2009/73 (in	ok, though consider replacing by the text in these directives to be applicable for all energy carriers	Changed as proposed

			relation to the gas market)].		
German Energy Agency (Deutsche Energie-Agentur, dena)	3.1.31 Guarantee of Origin (or GO)	It would make sense to mention that GOs can also be provided as an extract from the responsible registry in the form of a PDF file.	The electronic document can be provided as an extract from the Production Registrar or Issuing Body in the form of a PDF file.	We do not see a need to highlight this as electronic transfer using EDIs should be enforced	None
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	3.1.34	Hydrocarbons are also delivered in fluid state.	Delete "delivered in gaseous state."	agreed, already adopted in our text proposal of 25/5: An Energy Carrier consisting of chemical compounds composed mainly of the elements of carbon and hydrogen, which are in gaseous state when they are at 20°C and atmospheric pressure	none
Eurogas	3.1.34	Irrelevant, if not defined by purity level. And limiting purity level beyond scope of EN16325	delete clause	The hydrogen sector has jointly determined this purity level as defining for the envisaged product. If that sector jointly agrees to update the purity level, it can be done	none

GRTgaz	3.1.34	replace hydrocarbon gas by gaz	An energy carrier of which composition is compliant with the technical specifications of gas transmission networks as well as gas distribution networks. This energy carrier may be in a gaseous state as well as in a liquid state.	this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none

ENTSOG	3.1.34 Hydrocarbon Gas	We suggest changing the title of the definition throughout the text: from 'Hydrocarbon Gas' into 'Gas'. This would help align the Standard with RED II which refers to gases, including hydrogen (see Article 19(7)). We would also suggest improving the definition itself to make it clear that it covers hydrogen and liquefied gases. For this we propose two alternatives.	3.1.34. Gas An Energy Carrier consisting of chemical compounds composed mainly of the elements of carbon and/or hydrogen, being in gaseous state (when they are at 20°C and atmospheric pressure) or in liquefied state. Or 3.1.34 Gas An energy carrier of which composition is compliant with technical specifications of transmission networks as well as distribution networks. This energy carrier may be in a	this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none

			gaseous state as well as in a liquid state.		
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	3.1.35	The purity of hydrogen should not be part of its definition.	Change the definition of hydrogen Hydrogen Hydrogen used as an Energy Carrier.	follows the agreements within the hydrogen industry to serve consumers of pure hydrogen (who need their applications to be prevented from poisoning with impurities)	none
EnBW Energie Baden-Württemberg AG	3.1.35	"An Energy Carrier with a composition of at least 99.9% vol hydrogen; H2;" The purity of hydrogen	Change the definition of hydrogen: Hydrogen Hydrogen used	follows the agreements within the hydrogen industry to serve consumers of pure hydrogen (who need their applications to be prevented from poisoning with impurities)	none

		should not be part of its definition.	as an Energy Carrier		
Gaz Réseau Distribution France (GRDF)	3.1.4.6, Net Energy Production	It is appropriate to deduct from the gross energy production, the (natural) gas that can be used to produced biomethane in auxiliaries or directly injected into the anaerobic digestion process but it doesn't make sense to deduce electrical consumption of other equipment on the installation. It will make no sense in terms of "conversion" metrics of those energy.	Adapt this definition for hydrocarbon gas (at least in the dedicated part to this Energy carrier).	when auxiliary energy of other energy carrier is small, it can indeed be considered not to deduct it, for avoidance of administrative overkill. Once substantial quantities of auxiliaries, it is essential for consumer credibility of the GO system to address them.	auxiliaries in other energy carrier may be not deducted if less than 2%
Eurogas	3.1.46	Comply with text of RED 2. And Increase efficiency of GO system through avoiding GO conversion when injecting hydrogen into gas network: limit energy carriers to el, gas, h&c. Distinguish different gaseous carriers later by production device, energy source etc.	delete clause	It is not clear to which clause this comment relates, the section reference seems wrong	none
Fingrid Oyj	3.1.46	Nett energy production is gross energy -minus	Nett energy production is	Could be made independent of trade if surrounded by other	Change the definition

		auxiliaries. Producer is not responsible for grid losses and these cannot be deducted from produced energy. Allocating of losses to a producer is impossible. This is not defined in the RED II and this is why cannot be written in the standard. Definition of trade is not clear, consumption cancelling GOs is also part of the trade.	gross energy minus auxiliaries.	measures for prevention of double disclosure. Grid losses are not relevant in this definition, as the point of becoming 'available' is before the grid.	"available for trade" into 'available for consumption'?
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	3.1.47	The compatibility of gas is not relevant in EN 16325. It is regulated in the "gas market regulation".	Delete 3.1.47 or please explain further why this definition is needed.	The definition is introduced to use it furhter in the text, in section 5.2. There is an additional mandatory data field on the GO that identifies the 'type of gas', being either 'network-compatible gas' or 'other gas'. The text proposes to only allow cancellation of the GO for the same type of gas as the actual type of gas consumed. Several parties wanted to restrict the gases to which the standard applies to those gases that are fed into the natural gas grid. Such restriction is not in line with RED II, but to facilitate maximum transparency, this attribute 'type of gas' = network-	none

				compatible gas, shall be used for all those gases.	
EnBW Energie Baden-Württemberg AG	3.1.47	The compatibility of gas is not relevant in EN 16325. It is regulated in the "gas market regulation". for Example: hydrogen is not a network-compatible gas for gas grids transporting natural gas, but can usually be added to a certain amount (> 10 Vol.%)	Delete 3.1.47	The definition is introduced to use it furhter in the text, in section 5.2. There is an additional mandatory data field on the GO that identifies the 'type of gas', being either 'network-compatible gas' or 'other gas'. The text proposes to only allow cancellation of the GO for the same type of gas as the actual type of gas consumed. Several parties wanted to restrict the gases to which the standard applies to those gases that are fed into the natural gas grid. Such restriction is not in line with RED II, but to facilitate maximum transparency, this attribute 'type of gas' = network-compatible gas, shall be used for all those gases. hydrogen that is injected into the natural gas grid, shall be categorised as 'network compatible gas'. The maximum percentage of hydrogen injection into the gas grid, is regulated elsewhere (technical gas grid codes) and not subject of this standard.	none
ENTSOG	3.1.47 Network-compatible gas	We suggest removing the attribute 'network compatible gas' from a GO. It is questionable	Delete point 3.1.47	The definition is introduced to use it furhter in the text, in section 5.2. There is an additional mandatory data field on the GO	none

		whether the GO shall be used to certify the quality of gas – the feature which is important for the physical gas product and not for the climate value indication. Moreover, it does not have any added value for the consumer as all gas that is injected and transported by gas networks shall by default satisfy quality criteria verified and guaranteed by network operators.		that identifies the 'type of gas', being either 'network-compatible gas' or 'other gas'. The text proposes to only allow cancellation of the GO for the same type of gas as the actual type of gas consumed. Several parties wanted to restrict the gases to which the standard applies to those gases that are fed into the natural gas grid. Such restriction is not in line with RED II, but to facilitate maximum transparency, this attribute 'type of gas' = network-compatible gas, shall be used for all those gases. The purpose of the categorisation served by this definition is simply to make transparancy on the fact that the gas is gas-grid injected.	

ENTSOG	3.1.53 Public Support	The notion of 'public support' needs to be aligned with RED II (i.e. with definition of the 'support scheme'). See also comments to points 4.4.1.3(k) and 4.5.1.1 (n)(1)-(4) below.	3.1.53 Support scheme (or Support) any instrument, scheme or mechanism applied by a Member State, or a group of Member States, that promotes the use of energy from renewable sources by reducing the cost of that energy, increasing the price at which it can be sold, or increasing, by means of a renewable energy obligation or otherwise, the volume of such energy purchased, including but not restricted to, investment aid, tax exemptions or reductions, tax refunds,	Agreed	Changed as proposed

			renewable energy obligation support schemes including those using green certificates, and direct price support schemes including feed-in tariffs and sliding or fixed premium payments;		
Eurogas	3.1.60	Ensure transfer limited between existing accounts. This would allow to delete clause 4.2.c.3	Add definition of "Transfer"	This is addressed in chapter 4.7 Transfers	None
Fortum	3.1.60	No need for additional layer of GoOs. Regulative/Disclosure issue	Delete tradability term. There is either GoO or no GoO.	To be considered as a whole. If the concept of tradeable GOs is replaced, additional measures should be installed to prevent double disclosure of the same attributes.	Change in line with onsite consumption approach. Concept of tradeable GO abolished.

BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	3.1.65	'Tradable' must be distinguished from 'transferable'. See RED II Article 19 Nr. 2 (7) b -> A GO should have a data field to specify "…whether the installation has benefited from investment support and whether the unit of energy has benefited in any other way from a national support scheme, and the type of support scheme;"	3.1.65 Transferable GO A guarantee of origin from an installation that has benefited from a support scheme and thus can be transferred to the customer but is not tradeable.	There are 2 things here, restricting the tradeability on the account of onsite consumption and where the ownership is on the CB because the underlying production has received support. Tradeability on supported energy is facilitated, there is an attribute on the GO to enable the consumer to chose for supported energy or not.	None
Fingrid Oyj	3.1.65	Tradable GO: in pricipble all GOs are tradable, because there is no physical connection needed. The word tradable is not defined in RED II.	Definition is not relevant	This could be adopted if accompanied with adequate alterative measures for avoidance of double disclosure.	Change in line with onsite consumption approach. Concept of tradeable GO abolished.

EnBW Energie Baden-Württemberg AG	3.1.65	'Tradable' must be distinguished from 'transferable'. For example, if we were to receive an EEG-GO (supplied renewable energy) in Germany, it would not be tradable (it would result in double marketing) but it would be transferable to the customer. See RED II Article 19 Nr. 2 (7) b -> A GO should have a data field to specify "…whether the installation has benefited from investment support and whether the unit of energy has benefited in any other way from a national support scheme, and the type of support scheme;"	New definition: 3.1.66 Transferable GO A guarantee of Origin from an installation that has benefited from a support and thus can be transferred to the customer but is not tradeable. 3.1.67 Transfer Request	Thanks for pointing out how this can cause confusion in Germany. There are 2 things here, restricting the tradeability on the account of onsite consumption and where the ownership is registered because the underlying production has received support. The concept of tradeable GOs was aimed to avoid double disclosure of attributes that might be linked with physical consumption on the site of the production device, however we consider an alternative solution to overcome the same problem by omitting the concept of tradeable GOs.	Change in line with onsite consumption approach. Concept of tradeable GO abolished.

ENTSOG	3.1.7 Attribute	The definition of the Attribute is not limited to GOs which implies that characteristics of the energy carriers could be disclosed in some other way. This may lead to double disclosure. We suggest limiting it to GOs only (given the aim and scope of the Standard).	Add what is in brackets [ ] 3.1.7 Data specifying [in the GO] the characteristics of energy carrier produced by a Production Device in terms of the Input(s) used and/or the details of that Production Device.	The reference to GO from attribute was deleted on account of circular referencing (GO records attributes which are included in a GO). It is clear that the production includes an array of attributes and not all can be included in a GO. Therefore we have not limited the definition of attributes to those recorded in a GO.	None
Eurogas	3.1.7.	GHG emissions would not qualify either feature	Replace "Input(s) used and/or the details of that Production Device" with "the details of the production process"	Good point, indeed GHG emisisons would not fall under either.	Change 3.1.7 : added: 'and production process'
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	3.1.70	Why do we need this explicit new definition of "Usefull Heat"?	Please explain/give further details.	This is not a new defnition, it was alredy there in the old standard EN16325 and relates to the corresponding concept as mentioned in the Energy Efficiency Directive 2012/27 (EU). For eligibility to receive GOs for High Efficiency Cogeneration, it is not enough that heat is produced with	None

				electricity, but the heat needs to be used in order for the CHP to be considered high efficient (along with other criteria). The term is used in section 5.1 for which it is helpful that it is defined.	
EnBW Energie Baden-Württemberg AG	3.1.70	Why do we need this definition? "Heat" has already a definition.	Delete	This is not a new defnition, it was alredy there in the old standard EN16325 and relates to the corresponding concept as mentioned in the Energy Efficiency Directive 2012/27 (EU). For eligibility to receive GOs for High Efficiency Cogeneration, it is not enough that heat is produced with electricity, but the heat needs to be used in order for the CHP to be considered high efficient (along with other criteria). The term is used in section 5.1 for which it is helpful that it is defined.	None
Eurogas	3.1.9	Required in 4.4.1.3.h	Add definition of "nominal capacity": I'd suggest to require to inform on the nominal capacity of a production device at least in MW (and optionally on m3/h, etc.) Agree on	The nominal capacity is usually a given data from the production device constructor. It has never shown to confuse anyone not to define it explicitly, but a proposal could be made if it is deemed relevant. The unit for nominal capacity was not in synchrony for all energy carriers. It is proposed to use the same unit for the nominal capacity for all energy carriers, in order to be able to compare GOs of different energy	4.5.1: capacity in kW, 5.2.2: capacity in kWh/h under Normal temperature and pressure conditions

			additional layers of info (CV, pressure, temp etc.) being necessary.	carriers. Given the wide adoption of the unit kW for electricity, the need for the kW instead of MW to facilitate small devices and the fact that also in gas regulation the old units shift from Nm^3/h to kWh/MWh /h, it is proposed to continue with kW as the unit for the nominal capacity.	
Fingrid Oyj	4.10	Disclosure statement is defined in the national legislation.	Disclosure statement definition is not relevant for a standard.	FaStGO acknowledges that the disclosure to end consumers is the end of the process of which guarantees of origin are the beginning. In order for a guarantee of origin to have value, it is important that it lands in a system that doesn't allow double claims of the same origin. It strenghtens the quality of the guarantee of origin if some basic principles related to disclosures statements are aligned.	None
EECS Unit	4.10 Disclosure Statements	Support Cancellation for other parties than suppliers		Thank you for the endorsement	None
Eurogas	4.10.	GOs should not be limited to RES. See text of Art 19 (2) RED 2: "[…] Member States may arrange for guarantees of origin to be issued for energy from non- renewable sources. […]"	A National GO Scheme shall contain provisions for Disclosure Statements with regard to the timing of their	should be applicable at least for RES. As long as GO volumes for non-electrical carriers are relatively low, an accurate calculation excercise for the residual mix raises an administrative burden out of	added 'at least' for RES. Consider relieving some limitation to RES

			publication and their visual presentation. Disclosure Statements shall be calculated and prepared based on, as appropriate:	proportion. To be reconsidered when GOvolumes are bigger.	
UBA	4.10;4.11.5	Disclosure itself is not covered by RED II. These paragraphs should not be part of the EN16325.		FaStGO acknowledges that the disclosure to end consumers is the end of the process of which guarantees of origin are the beginning. In order for a guarantee of origin to have value, it is important that it lands in a system that doesn't allow double claims of the same origin. It strenghtens the quality of the guarantee of origin if some basic principles related to disclosures statements are aligned.	None
Fortum	4.11.1	Standard cannot force deeper regulation and legislation than existing national legislation and supervisory.	Should be in scope of national legislation. Only vague referral to duties of competent bodies.	Is not by default defined in all countries' legislation. Minimum quality assurance harmonisation is beneficial. One of the aims of this section is to strengthen VAT fraud prevention which occurs at cross border trade, for which same minimum level of monitorring is desirable.	none

EECS Unit	4.11.1 Monitoring	The intention of the text was to indicate that collective action was required of competent bodies, such that competent bodies provide data to enable system-wide monitoring to take place The responsibility for this should lie with a central authority, requiring competent bodies to detect and prevent fraud might be too strong: did they have the ability to do so? ACER has similar responsibility for electricity trading, not the competent body, and there are similarities with REMIT. The standard should call for such a central authority to be formed. REMIT (Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency) defines a framework for identifying and penalizing market abuse in wholesale energy markets across	"Competent Bodies shall implement effective measures to monitor the activity in the National GO Scheme in order to ensure compliance of Account Holders with this standard, and that enable the detection and prevention of fraud by the relevant authorities." and "When necessary, Competent Bodies may request information available in other Domains from their respective Competent Bodies, which the counterpart Competent Body may at its sole	thanks for the tekst improvement, indeed responsibilities of IB should not cover the full liability of VAT fraud prevention, though mainly should facilitate fraud detection	text proposal adopted

		Europe. Monitoring of the wholesale energy markets is performed centrally by the Agency for the Cooperation of Energy Regulators (ACER), in cooperation with national regulators. All participants, trading wholesale gas or electricity in Europe either on Organized Market Places or bilaterally, have the obligation to register in a central European register (CEREMP) and to report on a regular basis, details of their transactions to ACER. Transaction details to be reported are specified in the Implementing Regulation (EU) No 1348/2014 and include information such as Parties and beneficiaries (if any) to the contract, contract number and date of completion/modification/termination, units, price/unit, classification	discretion provide. The information that may be shared between among Competent Bodies for this purpose includes:"		

		of the energy commodity (EL/NG), buy/sell indicator, lifecycle information etc. (new, modification, termination). The submission of participants' reports is made through entities that meet specific technical and organizational requirements and have been certified by ACER as Registered Reporting Mechanisms (RRM). It was acknowledged that overall responsibility for VAT fraud lies with tax authorities, which already have access to data held by competent bodies. The definition of "effective" ("... Competent Bodies shall implement effective measures …") is important. Text has been amended as follows:			

Fingrid Oyj	4.11.1.	Monitoring is defined in the national legislation, the standard should only shortly refer to this item		Is not by default defined in all countries' legislation. Minimum quality assurance harmonisation is beneficial. One of the aims of this section is to strengthen VAT fraud prevention which occurs at cross border trade, for which same minimum level of monitorring is desirable.	none
Fingrid Oyj	4.11.2	Assesment is defined in the national legislation, the standard should only shortly refer to this item		Harmonisation of minimum quality assurance between countries strenghtens trust in the whole GO system and cross border transfer.	none
UBA	4.11.2 Assessment of the National GO Scheme	Comment to the last paragraph: It should not be mandatory to publish any audit result for an Issuing Body.	The Issuing Body and its supervisory authority "may" publish on its website a statement that the audit has been carried out, including the date and its outcome (whether the audit was satisfactory or not).	What is the argument for this proposal? The FaStGO team agrees that no detailed observations are to be published.	

EECS Unit	4.11.2 Assessment of the National GO Scheme	Agreed (as amended – "…website a statement whether that the audit …") Comment: The intention is to ensure member states have a common basis for assessing the reliability, veracity and reliability of GOs. An audit is not compulsory, but another competent body can request it, and make any decision on the acceptability based on the content of any audit report received. The receiving competent body is not bound to provide such an audit – "may" signifies the right to ask, not an obligation to provide. This is important, as provision of such an audit might be outside of the competence of the receiving competent body. A further consideration is whether the standard should require formal accreditation of each		thanks for the endorsement	none

		competent body by a suitable body.			
Gaz Réseau Distribution France (GRDF)	4.11.4, Verification of Consumption Déclarations and measurement data	to limit the administrative and economic burden on renewable energy producer, it will be more appropriate that the Member States decides the period in which the audit on the production device need to be updated in case of inputs from biological origin. Such flexibility will allow Member States to ensure consistency between GOs audit of the production device and other audits	Mentionned the "once every two years" timing only as a proposal in the standard.	can be done more frequently if desirable, but a minimum level of fraud prevention is necessary. In two years a lot of fraudulent reporting can take place, e.g. declaring unrenewable inputs as renewable	none

		(for public support, RED II obligations for example). This will streamline the different audits to which renewable energy producer is subject.			
Fingrid Oyj	4.11.5	Verification of disclosure statement is national legislation for disclosure.		FaStGO acknowledges that the disclosure to end consumers is the end of the process of which guarantees of origin are the beginning. In order for a guarantee of origin to have value, it is important that it lands in a system that doesn't allow double claims of the same origin. It strenghtens the quality of the guarantee of origin if some basic principles related to disclosures statements are aligned.	None
Eurogas	4.11.5 b)	GOs should not be limited to RES. See text of Art 19 (2) RED 2: "[…] Member States may arrange for guarantees of origin to be issued for energy from non- renewable sources. […]". As a consequence, we should keep the flexibility throughout the text to use GOs as disclosure instrument for all defined attributes.	6) that GOs are Cancelled in such amounts and with such Attributes as are adequate to corroborate the share or quantity of energy with specific Attributes in an energy supplier's energy mix and in the energy	should be applicable at least for RES. As long as GO volumes for non-electrical carriers are relatively low, an accurate calculation excercise for the residual mix raises an administrative burden out of proportion. To be reconsidered when GOvolumes are bigger.	added 'at least' for RES. Consider relieving some limitation to RES

			supplied to consumers under contracts marketed with reference to the consumption of energy with specific Attributes;		
EECS Unit	4.11.5 Verification of Disclosure Statements	Comment: The intention is to ensure that supplier claims can be verified by an independent body. The responsibility lies with the appropriate body – probably the regulator, but member states are free to nominate any party they feel to be appropriate. This supports the intention of RED II etc. and the EECS Rules.		Thank you for the endorsement	None
Fingrid Oyj	4.11.6	Operational practice is defined and supervised by a Member State level. There is no need to write details e.g. password to a standard		The standard aims to harmonise practices and establish a harmonised minimum quality assurance level. Is there a counter argument on the content, against what is written in the text?	None

EECS Unit	4.11.6 Operational practice	Agreed, provided the rules for the time for which data is retained (4.11.6[c]) are reviewed. Comment: The essence is that anyone owning a GO must have an account, to ensure that all national legislation includes the base information to enable full audit, so that there can be no gaps in the chain of custody for GOs traded internationally. This also supports dispute resolution. The inclusion of such "motherhood" statements is necessary, as no other requirement to do so exists. The standard requires retention of data for 5 and 10 years, which may differ from national practice. The advice should refer to "at least 5 years", to allow longer retention by some member states. Whle fraudsters may not be around for long, in some cases they have been		Makes sense, data retention policies have updated since GDPR	4.11.6 updated to 'at least 5 years'

		known to work within large organisations, unknown to them.			
Eurogas	4.2	Text suggests that attributes can be eligible for Transfer etc.	Delete "ii) to indicate that it has ceased to be eligible for Transfer and Cancellation through Expiry, its prior Cancellation or Withdrawal."	Agreed, but deleting phrase in b, would not work either is the status of a GO must be changeable. Easiest is to understand this status as one of the attributes and to leave the formulation as is	None

ENTSOG	4.2(c)(3) on Principles	Condition in point (c)(3) may constitute a barrier for cross-border trading. It needs to be further discussed. In the meantime we propose changing 'a' into 'any' (see in brackets [ ] below).	4.2(c)(3) This European Standard shall support and promote a set of long-term objectives for the development of National GO Schemes, being: … c) Ownership of GOs: 3) The ownership of the GOs may not be transferred to any person that does not hold an Account on [any] National GO Scheme.	This is a VAT fraud detection measure on trades taking place behind the account. For discussion with VAT fraud detection authorities, with whom FaStGO will have a meeting and furhter follow up.	none untill positive advice from VAT fraud detection authorities

Eurogas	4.2.	Text seems to limit to make use of aggregators and agents to the detriment of system efficiency	Delete "And an Account Holder may not transfer GOs on behalf of a third party which is not an Account Holder unless: i) It has registered with the relevant Competent Body that such third party is the owner of a Production Device for which it is acting; and ii) the transfer relates to GOs issues for that Production Device; and"	Aggregators providing services for producers are still facilitated. Agents for traders indeed are prevented to hold the GOs on behalf of the owner, this is a VAT fraud detection measure on trades taking place behind the account. For discussion with VAT fraud detection authorities, with whom FaStGO will have a meeting and furhter follow up.	4.2.c.2 rephrased: An Account Holder may not transfer GOs on behalf of a third party which is not an Account Holder. An exception is when the first owner of the GO after its issuing gives a proxy to another account holder to act on its behalf;
Fortum	4.2.	The specification of ownership should not be restricted to utilities or asset owners only. There is rising need for consumer disclosure and some market participants want to act on GoO market by themselves	Delete the refences to asset holder/devices	It is not intended to limit who can hold an account. Only intention is to increase VAT fraud detection by preventing trades behind the Account. Rephrased.	4.2.c.2 rephrased: An Account Holder may not transfer GOs on behalf of a third party which is not an Account Holder. An exception is

		and not via their suppliers. Need to widen the the possibility of GoO ownership and update the standard to match new market requirements. As an example in Germany it is impossible to cover one consumers portfolio without requesting cancellations from multiple suppliers.			when the first owner of the GO after its issuing gives a proxy to another account holder to act on its behalf;
UBA	4.2.b. Immutability	UBA strongly supports the AIB view here. The principle of immutability should be kept in the EN 16325 anyway.		Thank you for the endorsement	None
EECS Unit	4.2.b. Immutability	The EECS Unit supported this. Comment: It is being considered within CEN process whether "Immutability" should only refer to mandatory fields on GOs, and whether dropping voluntary data fields at import would help in overcoming barriers for integrating voluntary data fields, or would it hinder proper market functioning. However, where an importing competent body drops voluntary	… and …	Thank you for the endorsement	None

		data from a GO and exports it back to the original competent body, then the re-imported GO will not contain the voluntary data. AIB Members have objected to this strongly over the years and prefer to protect the fundamental principle of immutability. In particular, the value of GOs must not be compromised by the removal of voluntary data upon export.			
EECS Unit	4.2.g Integrity	The EECS Unit supported this		Thank you for the endorsement	none
UBA	4.2.g Integrity, 4.11.1.	Issuing Bodies should supply data and information regarding fraud cases to responsible tax authorities. While the prosecution and investigation is not a legal duty of Issuing Bodies.		Thank you for the endorsement	None
Fingrid Oyj	4.3.2.3	Responsibilities and tasks ore defined on the national legislation. Is it relevant to write to a standard obvious things that competent bodies shall comply wit legislation	Overlapping of legislation is not relevant	We see this not per definition as overlapping with legislation. It sums up the essential tasks to be assigned for reliable functioning of a GO system. It is not self-evident that legislation incorporates these tasks	None

ENTSOG	4.3.2.3 The following responsibilities are essential for each GO Scheme to function properly: (b) supervision of the accuracy of Disclosure Statements and of publication thereof; … 4.10. Disclosure Statements 4.11.5 Verification of Disclosure Statemen	It is questionable whether provisions on auditing and supervision of the accuracy of Disclosure Statements and residual mix calculation are relevant for gas (in the absence of the EU disclosure regulation similar to the one provided in the IEM Directive) and should be included in the scope of the Standard. They need to be further discussed and may apply to electricity GOs only.	Mentioned clauses might be moved to the Electricity specific section.	This was added to foresee a minimum quality guarantee for those energy carriers where disclosure systems are not yet regulated. If not mentioning any requirement, the credibility of the whole GO system is at stake, as double disclosure of the same MWh can easily occur	none

	ts + 3.1.18 Disclosure Authority				
Eurogas	4.3.2.4	1. Competences of IB should not be part of a clause that regulates its qualifications. 2. Once duly qualified as IB it should not depend on an owner's consent to use relevant data.	Delete "b) (subject only to the consent of the owner and/or operator of the relevant Production Device)	We assume this refers to 4.3.3. Both suggestion are an improvement and are adopted, thanks.	1) Stop the sentence after a) and start a new clause for b). 2)Delete in b) (subject only to the consent of the owner and/or operator of the relevant Production Device)
Eurogas	4.4.1.1	writing error	Replace "Production Database" with "Production Device"	True, to be corrected	Corrected in 4.4.1.1
Statkraft	4.4.1.3	GoOs are a tracking mechanism - please do not attached special label and 3rd party label information on the certificate. This is a completely separate thing on top of the tracking mechanism and is audited by 3rd party companies. The extra admin for registries to	Remove text	The labels are extra criterion on a GO on the basis of e.g. plant age or fuel sustainability. It makes it easier to assess whether the associated production adheres to certain extra criteria rather than individually assessing all attributes.	None

		include and validate 3rd party claims would be extremely prohibitive.			
Fortum	4.4.1.3	Labels are additiona on top of GoO. Not to be included on the GoO itself. This might lead to situations to adopt some labels and disregard others. Similiar problematic with optional information. The GoO should be information tool which charasteristics are specified by RED II	Delete application information on additional labels	The labels are extra criterion on a GO on the basis of e.g. plant age or fuel sustainability. It makes it easier to assess whether the associated production adheres to certain extra criteria rather than individually assessing all attributes.	None
ENTSOG	4.4.1.3 (k)(2)	The notion of public support needs to be aligned with RED II. See also comments on point 4.5.1.1 (n) below.	4.4.1.3 The following information shall be provided to the Issuing Body, which shall record it in its Registration Database, in addition to any requirements as are defined in sections 5.1.2, 5.2.2, 5.3.2, 5.4.2 : k) Information on the support scheme, where relevant:	Aligned based on another comment	Corrected

			... 2) whether the unit of Output of the Production Device might be eligible to benefit and/or has benefited in any other way from a national Support scheme;		
AGCS Gas Clearing and Settlement AG	4.4.1.3 Application information Sentence in brackets of point f ("(irrespective of whether or not there is any intention to use such Inputs in	The Sentence in brackets should be deleted. It provides additional burden during the application process while it does not add any relevant information to the information and data of the production device.	The Sentence in brackets should be deleted.	True, there is no need to list all potential fuels but rather just the ones that will actually be used	Deleted sentence in brackets in 4.4.1.3.f

	connection with the Production Device")				
Eurogas	4.4.1.3 h	definition required	Define "nominal capacity" to be expressed at least in KWh under standard conditions re temperature, pressure, …	The nominal capacity is usually a given data from the production device constructor. It has never shown to confuse anyone not to define it explicitly, but a proposal could be made if it is deemed relevant. The unit for nominal capacity was not in synchrony for all energy carriers. It is proposed to use the same unit for the nominal capacity for all energy carriers, in order to be able to compare GOs of different energy carriers. Given the wide adoption of the unit kW for electricity, the need for the kW instead of MW to facilitate small devices and the fact that also in gas regulation the old units shift from Nm^3/h to kWh/MWh /h, it is proposed to continue with kW as the unit for the nominal capacity.	4.5.1: capacity in kW, 5.2.2: capacity in kWh/h under Normal temperature and pressure conditions
Gaz Réseau Distribution France (GRDF)	4.4.1.3, Application infomation	To limit admnistrative and economic burden on actors to declare their production device on the registry, it is appropriate to mention only the inputs and energy	Delete the sentence in brackets.	True, there is no need to list all potential fuels but rather just the ones that will actually be used	Deleted sentence in brackets in 4.4.1.3.f

		carriers really used/produced by the production device. No need neither usefull for consumer/registry to know all information on what could be the Production device, only what it will really be.			
Eurogas	4.4.1.4	Either delete "but need not to be recorded in R. database" or delete requirement to send details: It does not make sense to provide details that will not be processed by Competent Body	Details of the following, including where relevant diagrams, shall also be provided to the Competent Body, to be recorded in its Registration Database:	These are not included in the registry, but provide important assurance to the Issuing Body to excess GOs from being issues in case the measurement scheme is erroneous or fradulent.	None
Eurogas	4.4.2	Replace "may" with "shall" as otherwise "at least" in the following sentence would not make sense.	In addition to this information, Competent Bodies shall request additional supporting documents as part of their due diligence procedures.	Agreed, would change this to: This *could* include at least the following information	4.4.2 amended
Becour	4.4.2 Applicatio n	We think that countries should not be allowed to limit the account to renewable energy suppliers and that this should be		It is not intended to limit who can hold an account (however it is not prevented that countries may limit	4.2.c.2 rephrased: An Account Holder

	procedure for Account Holders	implemented in this paragraph. It hinders consumers of renewable energy to have a flexible range of GOs solutions.		this themselves). Only intention of this paragraph is to increase VAT fraud detection by preventing trades behind the Account. Rephrased.	may not transfer GOs on behalf of a third party which is not an Account Holder. An exception is when the first owner of the GO after its issuing gives a proxy to another account holder to act on its behalf;
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	4.4.2 d)	It is unclear why the financial situation of the company may be relevant.	Please explain/give further details.	It is proposed as a measure for VAT Fraud prevention to bounce malafide companies.	None
EnBW Energie Baden-Württemberg AG	4.4.2 d)	Why is the financial situation relevant? Further justification required.	Delete	It is proposed as a measure for VAT Fraud prevention to bounce malafide companies.	None
Eurogas	4.4.3 a	Redundant	Delete "taking place in advance"	for REMCO: Agreed that the current phrasing is not clear. I don't understand 4.4.3.a	
Eurogas	4.4.3 b	Term not defined and not common either	Delete ", its servants"	Agreed, should be deleted	Deleted "its servants" 4.4.3b
Eurogas	4.4.4	Registration should not be time limited. RE-registration only in case	Delete "a) where the period of time during which that	The re-registration may be a lighter process than initial registration, but periodic check is perceived to add value and trust in	None

		of significant alterations been made to the device.	Production Device has been recorded in that Registration Database exceeds five years (or such shorter period as is defined in the relevant National GO Scheme), unless the Registrant re-applies for registration of the Production Device in accordance with 4.4.1 Application procedure for Production Devices; or”	the system.The extent and depth of the re-verification process is at the discretion of the Issuing Body.	

ENTSOG	4.4.4 Revision of Registration Databases	Condition in point 4.4.4(a) specified in brackets [ ] needs to be discussed. It might impose an unnecessary burden on producers. 4.4.4. Further, the Issuing Body shall amend its Registration Database to show that the Production Device no longer qualifies for GOs: a) where the period of time during which that Production Device has been recorded in that Registration Database exceeds five years [(or such shorter period as is defined in the relevant National GO Scheme)], unless the Registrant re-applies for registration of the Production Device in accordance with 4.4.1.		The re-registration may be a lighter process than initial registration, but periodic check is perceived to add value and trust in the system.The extent and depth of the re-verification process is at the discretion of the Issuing Body.	None
Eurogas	4.5.1.1	Comply with text of RED 2. And Increase efficiency of GO system through avoiding GO conversion when injecting hydrogen into gas network: limit energy carriers to el, gas, h&c.	a) the Energy Carrier by which energy is conveyed, being Electricity, Heating, Cooling or Gas;	Conversion Issuance MAY occur, the hydrogen GOs produced elsewhere can also be used by a pure hydrogen consumer if the H2 GO owner desired not to use them for conversion into hydrocarbon gas. However, the administrative process for conversion issuance for H2 into HC gas is much simpler than for other conversions. First of all, the measurement body, likely to be the gas grid operator, measures and	

		Distinguish different gaseous carriers later by production device, energy source etc.		registers injection into the gas grid anyway. Once systems are designed, if done well / even automated, this conversion issuance could be about the same amount of work as the very registration of the infeed into the gas grid.	
Ludwig-Bölkow-Systemtechnik GmbH	4.5.1.1	The GO should contain as additional attribute the greenhouse gas footprint of the produced energy. This is important as energy from renewable energy can have high GHG footprints, even higher than from fossil primary energies! In order to avoid that renewable GOs can be issued for energies having a very high carbon footprint, the GHG footprint needs to be specified. The GHG footprint gets worse the higher the number of conversion steps in the production chain.	q) the greenhouse gas footprint of the produced energy.	There is no consensus on whether GHG information should be mandatory and hence it is added as an optional data field	none
EECS Unit	4.5.1.1 Obligatory information on a GO	Accepted		ok	none

ENTSOG	4.5.1.1.(g),(n) 4.5.6.2.2.2	Regarding point (g) of 4.5.1.1 editorial changes needed regarding cross-reference. Regarding 'public support' attribute in point (n) of 4.5.1.1 and 4.5.6.2.2.2, the wording needs to be aligned with Article 19(7)(d) of RED II. In point 4.5.6.2.2.2 we also suggest that purpose of all GOs should be the same, i.e. Disclosure. Therefore, there might be no need to duplicate the purpose during energy carrier conversion and reference to the purpose could be removed.	4.5.1.1 Obligatory information on a GO A GO shall contain at least the following Attributes: … g) the Source Type (see normative Annex A); a GO may only refer to a single Source Type category which is allocated to it in accordance with 4.5.5 and 4.5.6 respectively; ... n) an indication, as appropriate, as to whether 1) the Originating Production Device has received Investment Support;	Thanks for the improvements. The first and last one are adopted. Purpose on the GO is maintained as also in a single purpose document this clarifies and excludes confusion hence double counting. Support description maintained, as it refers to the definition of Public Support which is aligned to the REDII. support for the Unit of energy = another way of support.	editorial changes adopted. Mentioning on the GO of the type of support scheme is added, in line with art. 19.7 of REDII. Definition of Public support is aligned with art. 2.5 of REDII.

			2) the unit of energy to which the GO relates has benefited in any other way from a national support scheme; 3) the type of support scheme 4.5.6.2.2 Data to be mentioned on GO after Conversion Issuance Those Attributes recorded on the GO after Energy Carrier Conversion are those which relate to the Production Device of the Energy Carrier Conversion, except for the following Attributes:… 2. Meta data for system management:		

			o Attributes related to the type and description of any support scheme (as in 4.5.1.1n)), shall be cumulated from the Input and the Production Device; and …		

HAMBURG INSTITUT	4.5.1.2	4.5.1.2 Optional information on a GO In this paragraph, several points are listed which "a GO may contain" in addition. Given the limited practical experiences with the implementation of heating and cooling or gas GO schemes for RES, it would be desirable if member states were permitted to include further additional information items in national schemes, which are not predefined in the standard. This would be more in line with the standard's character as a harmonised minimum set of rules. If member states choose to adopt additional optional in-formation requirements, valuable lessons may be generated for future revisions of the standard.		that is the case anyway: member states can add more info on the GO. Just they'll have to make agreements with other issuing bodies if they want this information to be maintained after cross border transfers	none

Renewable Energy Association (Poland)	4.5.1.2	It should be noted that the intention is that guarantees of origin should optionally include information on the carbon footprint of only the fuel from which the energy covered by the guarantee was produced, excluding energy transport and emissions related to the installation itself. Following the above, in accordance with the proposed standard, in the case of installations using wind, solar or water energy, these emissions will be zero. We postulate to consider introducing a complementary solution to the above, which is an optional information on avoided greenhouse gas emissions in connection with the use of renewable energy, instead of using conventional sources. The above proposal has already been successfully implemented in the Polish system, and is based on	0	Add note that footprint of PV and Wind is zero considering the calculation perimeter defined in this annex Quantification of avoided emissions requires sepcification of the reference - at this stage this needs to be done by the GO user	Add to 4.5.1.2 to mention on the GO a reference to the methodology used for determining the carbon footprint. Add to annex E a note that footprint of PV and Wind is zero considering the calculation perimeter defined in this annex.

		data published as part of the National base for greenhouse gas emissions and other substances and Emissivity indicators for electricity, calculated by National Research Institute in connection with art. 22 paragraph 1 lit. k Directive 2009/28/EC and with Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading.			
UBA	4.5.1.2 c) Optional information on a GO: Label /ICS	UBA strongly supports that it stays optional to have Label information on the GO.		Thank you for the endorsement	None
GRTgaz	4.5.1.2 d)	Moving this paragraph in 4.5.1.1		There is no consensus on whether GHG information should be mandatory and hence it is added as an optional data field	none
ENGIE	4.5.1.2 Optional information on a GO	We support the inclusion of the carbon footprint at least as an optional field.		Thank you for the endorsement	None

ENTSOG	4.5.1.2 Optional information on a GO	It is not clear whether National GO Schemes shall be obliged to introduce data fields provided in point 4.5.1.2 in the GO or not. We suggest that these data fields shall be introduced in all National GO Schemes but the energy producers should be entitled to choose whether to fill in these fields or keep them empty. From the producers' perspective these data fields shall remain optional.	Add one sentence in brackets [ ]. 4.5.1.2. Optional information on a GO In addition, a GO may contain: a) where applicable, the capacity of the relevant production element of the Production Device and the date when this production element became operational; ... e) such Energy Carrier-specific information as is considered optional under sections.5.1.6, 5.2.6, 5.3.5, 5.4.5. [The National GO Scheme shall introduce in the	It is intended that this is also optional for the issuing body whether or not to facilitate this information to be carried on the GO. An argument could be lack of investment funds or lack of expertise to incorporate these fields, without which the GO scheme is still a functional GO scheme. The current phrasing 'a GO may contain ...' facilitates the national GO scheme to determine its architecture	none

			GO data fields specified in this clause, but they shall be filled in upon request of the Production Devices].		
German Energy Agency (Deutsche Energie-Agentur, dena)	4.5.1.2 Optional information on a GO, number d)	The reference in the text is missing after "a quantification of carbon footprint of the Output covered by the GO…"	Insert text reference.	thanks, done	Correct reference to Annex E in 4.5.1.2 Optional information on a GO, number d)
EECS Unit	4.5.1.2 Optional information on a GO: Label /ICS	The EECS Unit supported this		Thank you for the endorsement	None

EnBW Energie Baden-Württemberg AG	4.5.1.2. d)	Optional information "quantification of carbon footprint"	Either here or under 5.2.5 GHG Reduction of the GO and the fullfilment of sustainability, both regarding RED II Article 29 should be included	Thanks, text incorporated, using elements from the corresponding text of the EECS Gas Scheme and suggestions from other respondents to this consultation. GHG Saving criteria	text in 5.2 updated with additional optional attributes on HC gas GOs
Association ECS Switzerland	4.5.1.2.d), 4.5.6.2.2, 4.5.6.2.3, 4.11.4.1), 4.11.4.2), 5.2.1, 5.2.4.d), 5.4.1	missing links	missing links	thanks, done	Correct reference to Annex E in 4.5.1.2 Optional information on a GO, number d)
UBA	4.5.2	UBA would prefer not to simplify the information on GOs as FaStGO suggests, and RED II says it is a "may".		Yes the fastgo proposal is also a "may"	None
EECS Unit	4.5.2 Simplified Information on GOs for Production Devices with a nominal	While FaStGO would prefer not to simplify the information on GOs, RED II required this and so the recommendation of FaStGO was to standardise the items of data on a GO which can be abbreviated.		Thank you for the endorsement	none

	capacity below 50 kW	The location of any group should be maintained, and that the size of groups might need to be limited to ensure this.			
Eurogas	4.5.3 b 3)	Too wide as "disclose" is not defined as being limited to energy certification. Plus: Does this not prevent "multipurpose" certificates?	3) of which the Attributes have not been and will not be Disclosed by any other energy certificate.	The idea is to prevent double disclosure as a whole and not limit this prevention to energy certification only. Otherwise it would undermine the credibility of the GO. Therefore we see the current formulation justified	None
ENTSOG	4.5.3(b)(2) 4.5.4.10.2 Description of the Guarantee of Origin system and its components	The draft provides that GOs should be issued after the measurements are made available. However, it is not clear who is responsible for providing measurements to the Issuing Bodies (Authorised Measurement Body or Registrant of the Production Device?) and whether TSOs/ DSOs could be considered as Authorised Measurement Bodies. These issues are important to clarify as they have impact on GO issuance and may obstruct this process, if		who is the measurment body is up to the Domain GO scheme to determine	none

		not written straightforwardly.			
Fingrid Oyj	4.5.4.2	Calculation nett energy is gross minus auxiliaries, as in the current standard	Nett energy is gross energy minus auxiliaries	Indeed, definition of Nett Production can be modified as mentioned in response to the comment on 3.1.28, accompanied by the proposed measures for replacing the concept of tradeable GOs.	add text between "": An Issuing Body may Issue GOs for Nett Energy Production that takes place in its Domain, "on condition that it is ensured that the attributes of this amount of energy are prevented from being Disclosed through other means than by cancellation of these GOs".

HAMBURG INSTITUT	4.5.4.3	4.5.4.3 Determination of energy eligible for issuing Tradeable GOs We support FaStGO's proposal of differentiating between tradeable and non-tradeable GOs, and allowing national schemes to choose whether non-tradeable GOs are issued for onsite consumption. Eventually, clear guidance will be required under what conditions non-tradeable GOs can be issued and cancelled – e. g. if companies wish to use GOs from onsite electricity or heating installations in their sustainability reporting. However, there is still a significant research gap in how to treat onsite consumption in disclosure and labelling.		Thanks. On top of onsite consumption are there other cases that would lead to separating tradeable vs. non-tradeable Gos. General aim is avoiding double disclosure and strengthening consumer trust in the GO system.	Consider replacing concept of tradeable vs non-tradeable GOs by addition of an attribute on the GO that identifies the disseminiation level of the physical energy for which the GO is issued. Accompanied by a statement that the consumption and production of this energy should be incorporated in calculation of the residual mix if not cancelled immediately upon issuance.
Eurogas	4.5.4.3	"is traded" should not define the right to issuance of a GO as the relevant energy might not be traded at all after having "left" the production facility.	GOs may only be issued for Output representing energy that is injected into a network or any	If the concept of tradeable GOs is replaced, additional measures should be installed to prevent double disclosure of the same attributes	Consider replacing concept of tradeable vs non-tradeable GOs by addition of an attribute

		Consumption without prior trade transaction is also possible.	other transport mode.		on the GO that identifies the disseminiation level of the physical energy for which the GO is issued. Accompanied by a statement that the consumption and production of this energy should be incorporated in calculation of the residual mix if not cancelled immediately upon issuance.
Fingrid Oyj	4.5.4.3	Word tradable is not clear what it means. All production in eligible to get GOs. Possible douple dosclosure must be avoided by cancellation requirement	Definition is not relevant	If the concept of tradeable GOs is replaced, additional measures should be installed to prevent double disclosure of the same attributes	Consider replacing concept of tradeable vs non-tradeable GOs by addition of an attribute on the GO that identifies the disseminiation level of the physical energy for which the GO is issued. Accompanied by

					a statement that the consumption and production of this energy should be incorporated in calculation of the residual mix if not cancelled immediately upon issuance.

EECS Unit	4.5.4.3 Determination of energy eligible for issuing Tradeable Gos	Notes raised by some members, while majority supported the text compromise: The Directive does not introduce the concept of a "tradeable GO" – and "tradeable" is hard to define, although it was accepted that the meaning is mentioned elsewhere in the document. While double counting is adequately addressed, "double perception" cannot be addressed by a standard and is outside of ites scope. The intention is to require the use of GOs to prove the renewable source of energy - other mitigating provisions must be introduced if this provision is deleted. We need to consider multinationals transferring GOs between their subsidiaries with onsite production in different countries. The phrase ("… of which the attributes have yet to		If the concept of tradeable GOs is replaced, additional measures should be installed to prevent double disclosure of the same attributes	Consider replacing concept of tradeable vs non-tradeable GOs by addition of an attribute on the GO that identifies the disseminiation level of the physical energy for which the GO is issued. Accompanied by a statement that the consumption and production of this energy should be incorporated in calculation of the residual mix if not cancelled immediately upon issuance.

		be disclosed…") is hard to understand hence is better rephrased: the challenge was to prevent sale of a GO to one party, and sale of the associated electricity as RES-E to another party. This is important in order to assure similar implementation of RED II and EN16325 in different MS. GOs for onsite production are tradeable in some countries, but different support schemes and market values in different countries introduce an issue for further consideration, perhaps replacing the term "tradeable" ("transferrable" and "eligible for trade" were proposed) at the next CEN WG5 subgroup on electricity.			

UBA	4.5.4.3; 5.1.8 2.	Without grid feed-in, it is not even theoretically possible to supply third parties with the electricity on which the GO is based. However, this is a mandatory characteristic of GOs in the sense of UBA, since according to Art. 15 (1) Directive 2009/28/EC, GOs serve as proof to the end customer of the origin of electricity generated from renewable energy sources. Based on our understanding of the directive and its implementation in German law, UBA is able to guarantee green electricity customers that the amount of renewable energy represented by an amount of canceled GOs has been fed into a european electricity grid. This was UBAs response to the prevailing critical opinion on GOs and the discussion about greenwashing and relabeling of green electricity by GOs.		Thanks, we'll keep the general concern of avoidance of double consumption in mind while considering the options to overcome it.	Consider replacing concept of tradeable vs non-tradeable GOs by addition of an attribute on the GO that identifies the disseminiation level of the physical energy for which the GO is issued. Accompanied by a statement that the consumption and production of this energy should be incorporated in calculation of the residual mix if not cancelled immediately upon issuance.

		Therefore we can support the two alternatives: -The issuance of non-tradable GOs for onsite consumption or -The issuance and immediate cancellation of GOs related to onsite consumption.			
EnBW Energie Baden-Württemberg AG	4.5.5.1.2 a)	"The amount of Output consumed in Energy Storage" means the losses of a storage? In that case: losses cannot be consumed output because output is the production of the device. The losses take place before emitting output;	… specify therein the amount of Energy self-consumed in Energy Storage…	Actually, here the term Output refers to the Output of the Production Device which has an Energy Storage. Therefore the term is justified and more descriptive than energy, although it should be clear that the energy flowing out of a storage is not Output. So indeed the Output of the PD before injected into the grid.	None

		therefore losses cannot be consumed output.			
Eurogas	4.5.5.1.3	Energy does not have mass. "Energy Source Input" to be defined, e.g. "in kg or m3"	"[…] is the mass of the relevant Energy Source Input or Energy Carrier Input respectively"	makes sense, thanks. "material that is fed into the Production Device as the "	Avoid referring to energy as having a mass
AGCS Gas Clearing and Settlement AG	4.5.5.2 Calculation of Output	This is not relatable for energy carriers with changing input types. The production of renewable gas is based on a mix of inputs, not only on one single input. How can this system be made applicable for a mix of inputs represented by several Energy Input Factors?	None	Gos are issued for each energy input in proportion of their energy content. This is an essential design criterion of an efficient transfer system: a GO buyer can select x GOs of source type y. also for publishing statistics of and across member states, this is much more market facilitating. An optional data field is added to the HC GO that allows for mentioning in addition the mixture of the inputs	none

ENTSOG	4.5.5.2 Calculation of Output 4.5.6.2.1 Conversion Issuance	We suggest aligning the terminology across the Standard, i.e. using 'Nett Energy Production' instead of 'Nett Energy Generation'.	4.5.5.2 Calculation of Output Subject to the requirements of the National GO Scheme, the amount of Output associated to each Input determined for the purposes of GOs associated to each Input shall be the amount of Nett Energy Production from that Production Device multiplied by the Energy Input Factor for that Input, which shall be equal to one (1) where the Production Device produces energy from one Input, or as calculated in 4.4.4.25.5.1.3 where the Production	Agreed, term Generation replaced by production in two instances	Agreed, term Generation replaced by production in two instances

			Device produces energy from more than one Input. 4.5.6.2.1 Conversion Issuance The amount of GOs to be Issued following Conversion Issuance shall be based on cancelled GOs per specific Source Type recorded on them, in correspondence to the Input Energy Carrier, and equal the measured Nett Energy Production multiplied by the Energy Input Factor for each of the Inputs. The same principle as in section 4.5.5.2 is maintained.		

Gaz Réseau Distribution France (GRDF)	4.5.5.2, Calculation of Output	The MWh attested by the GOs is a mix of Input, not only produced from one Input. The GHG emission value of the MWh produced need it to take into account the volume of each Input used to produced the MWh, but not the GOs.	For biomethane production, the GOs need to be allocated to a mix of Input, not only one of the Input of production regarding their quantity in the Production process. So mention that such element is just an option in the generic part of this standard (see comment n°1).	Gos are issued for each energy input in proportion of their energy content. This is an essential design criterion of an efficient transfer system: a GO buyer can select x GOs of source type y. also for publishing statistics of and across member states, this is much more market facilitating. An optional data field is added to the HC GO that allows for mentioning in addition the mixture of the inputs	none

HAMBURG INSTITUT	4.5.6	4.5.6 Energy Carrier Conversion and Conversion Issuance The proposal for rules governing energy carrier conversion and conversion issuance is appreciated. For the cross-sectoral integration of the energy system, transferring the green attribute of renewable elec-tricity generation to the production of gas, liquid fuels, heating and cooling is of increasing importance. Bridges between energy sectors are required (e. g. from renewable electricity to hydrogen to district heating) – accordingly, there need to be reliable interfaces between the GO schemes for different ener-gy carriers. Especially for industrial applications, power-to-X conversion technologies are of high rele-vance. In extreme cases, it may be necessary to transfer the green attribute across several stations and		Thank you for the endorsement	None

		sectors. When implementing the standard, a close monitoring is necessary if it succeeds in promoting a secure and credible transfer of green attributes across energy carriers and infrastructures. As this is a new field of application, adjustments may be necessary once practical experiences are available.			

ENTSOG	4.5.6 Energy Carrier Conversion and Conversion Issuance	If the final version of the draft of the Standard keeps two types of GOs (for Hydrocarbon gas and pure Hydrogen), we propose changes to ensure that conversion of Hydrogen GO into Hydrocarbon GO (i.e. in case of injection into a network, where production of a new energy carrier does not occur) could be made according to general rules and will not be impeded due to references to production devices and processes only. See proposed addition in brackets [ ].	4.5.6 Energy Carrier Conversion and Conversion Issuance 4.5.6.1 Principles 4.5.6.1.1 General The principles set out in the previous and following sections equally apply for Conversion Issuance, and are explained in this section for clarification, for the specific case of Conversion Issuance. … [Provisions of 4.5.6. shall apply mutatis mutandis to conversion issuance outlined in 5.2.7.2.]	Agreed with the principle to ensure the rules for conversion issuance. We deem this is already the case with the current text. We see no benefit in adding a rule for one specific energy carrier in the generic section.	none
German Energy Agency (Deutsche	4.5.6.2.2 Data to be mentione	The reference in the text is missing after "3. Attributes related to any carbon footprint (as in…"	Insert text reference	thanks, done	Correct reference to 4.5.1.2.d)

Energie-Agentur, dena)	d on GO after Conversion Issuance, number 3.				

HAMBURG INSTITUT	4.5.7	4.5.7 Energy Storage It is proposed that no GOs shall be issued for energy that flows out of a storage device (unless it is lo-cated directly after the production device and no GOs are issued for the production of output of the production device). According to the proposal, GOs may be cancelled to disclose the attributes of ener-gy losses during storage on a voluntary basis. In our opinion, adopting a voluntary approach to the handling of storage losses must be viewed critical-ly. Electricity and heat storage devices will play a major role in the future energy system, as the share of RES increases. Therefore, it is important to find a consistent solution for handling energy losses during storage in the GO system. If cancelling GOs for storage losses is left to the discretion of		From the point of view of the GO system, storage is considered as energy consumption for the part of energy that is lost in the storage. Therefore it is left at the discretion of the storage operator to decide whether this energy is green or not. This is similar to how e.g. grid losses are handled (each grid operator may decide to green losses or not). Only storage losses right after production are taken into account, because these can be physically related to the amount of GOs issued.	None

		individual suppliers, the transparency and credibility of the GO scheme would be negatively affected. If storage losses are not addressed in the standard, member state GO schemes should be able to make provisions in this regard. Of course, the administrative burden involved with cancelling GOs for input energy carriers and issuing them for output carriers is an important concern. However, neglecting storage losses (and also network transmission losses, including in heating grids) may result in market distortions: the total amount of GOs issued would lie above the amount of GOs cancelled. Also, failure to cancel GOs for storage losses cre-ates distortions compared to energy storage in a different energy carrier (e.g. in the			

		case of Power to Gas), where conversion losses are taken into account in GO issuance.			

Eurogas	4.5.7	"is traded" should not define the right to issuance of a GO as the relevant energy might not be traded at all after having "left" the production facility.	No GOs shall be issued for energy that is withdrawn from a Storage device. The only exception is where the Storage device is located before the energy is injected into a network or any other transport mode connecting the Production Device with a Consumer, and no GOs are issued for the production of Output of the production Device.	Indeed, grid injection is a better criterion than availability for trade	In 4.5.7, exception for issuing for energy flowing out of a storage was changed from available to trade into injected into grid
UBA	4.5.7 Energy Storage	UBA supports this principle in general expect from the last sentence: "GOs may be cancelled to Disclose the Attributes of any energy losses that may occur during storage." UBAs position is that		From the point of view of the GO system, storage is considered as energy consumption for the part of energy that is lost in the storage. Therefore it is left at the discretion of the storage operator to decide whether this energy is green or not. This is similar to how e.g. grid losses are handled (each grid operator may decide to green losses or not).	None

		disclosure of any energy losses is not covered by RED II. Therefore this sentence should be deleted.			
EECS Unit	4.5.7 Energy Storage	Agreed, with the proviso that the last sentence should be added as a note.		Thank you for the endorsement	Last sentence is preceded by the word 'note'. It doesn't change the meaning of the tekst but rather clarifies the options.

ENTSOG	4.5.7 Energy Storage 4.9.2.1.2 Requesting a cancellation 4.9.2.2(c) Requesting and Producing a Cancellation Statement 0.2 Description of the Guarantee of Origin system and its components	In 4.5.7 Energy Storage operators should be allowed to green energy losses only if they acquired and cancelled GOs for respective amount of energy losses (or have a wholesale energy supplier who may do this for them). This means that they should follow general rules and principles as any other beneficiary of the GO cancellation. We proposed respective changes in [ ]. We also applied changes to accommodate our proposal on the definition of the Energy Storage (the word 'device' is deleted in 4.5.7). Moreover, in 4.9.2.1.2 and 4.9.2.2 (c) we suggest clarifying the terminology used in relation to beneficiaries (for example, it is not clear who the retailer is in this context) and harmonising it throughout the text (e.g.	4.5.7 Energy Storage No GOs shall be issued for energy carrier that flows into or out of an Energy Storage. The only exception is where the Energy Storage is located directly after the Production Device before the energy is available to the market for trade, and no GOs are issued for the production of Output of the production Device. GOs may be cancelled to Disclose the Attributes of any energy losses that may occur during storage [, if they were acquired by the	Thank you for the comment: 1. Storage operator can be considered as a consumer of energy and therefore, needn't to be mentioned separately as a possible beneficiary. Sentence between [] would duplicate and further restrict other pragraphs of the standard, the GOs could e.g. also be acquired by the supplier of the storage operator, not necessarily by himself; conclusion: no need to make [] explicit. 2. Thanks for the text improvements in 4.9.2, they are all adopted. End consumer seems more applicable here, than the concept 'final customer' of the regulated electricity and gas markets, because it also applies to unregulated consumption.	1) 4.9.2.1.2.e)2)ii) Replace Final customer with "end consumer". 2) 4.9.2.2.c 2) replace "supplier or end-beneficiary" by "beneficiary"

		it seems that 'customer' and 'consumer', 'end-user' and 'final customer' are used interchangeably which might create difficulties for understanding; it is better to avoid this diversity of terms). We propose some changes but you may also consider the terminology used in the relevant EU law (e.g. Gas Directive), e.g. 'customer'/ 'final customer'. Similar changes are proposed to the introductory section. The list of possible beneficiaries should also include energy storage operators.	respective Energy Storage operator and transferred in advance into its account according to sections 4.6 - 4.7 of this Standard (4.6 Ownership of GOs, 4.7 Transferring of GOs)] 4.9.2.1.2. Where an Account Holder requests that an Issuing Body Cancels one or more GOs then such a request shall contain the following information: e) the beneficiary of the Cancellation: 1) the type of beneficiary, being either i) “energy supplier” (on		

			behalf of its retailer(s) and/or end-consumer(s)), or ii) “end-consumer” directly (including Energy Storage operator) or iii) “Production Device operator”, in case of Energy Carrier Conversion; 2) the identity of beneficiary: i) the energy supplier; or ii) the end-consumer consuming the corresponding amount of energy; or iii) the Production Device in which the energy is being converted into another Energy Carrier, in case of		

			Conversion Issuance; or according to type of beneficiary as identified in (1); location and country of energy supplier or, end-consumer, or Production Device according to type of beneficiary as identified in (1). 4.9.2.2.c The provisions of each National GO Scheme shall be such that in addition to the items listed in section 4.9.2.1 each Cancellation Statement shall display: c) a statement that the Attributes of the associated energy have been consumed		

			and that the Cancellation Statement and these information on GOs included in it may not be transferred to any party other than the beneficiary identified in this Cancellation Statement; 0.2 Description of the Guarantee of Origin system and its components Account Holder registration …Only legitimate companies (legal persons) with the intention of participating in the GO market as producers, traders and/or energy suppliers/ customers/ other beneficiaries are		

			permitted to register as GO account holders….		

UBA	4.6 Ownership of GOs	After revision of this paragraph UBA will do a reassessment.		-	None
EECS Unit	4.6 Ownership of Gos	Comment: This has been applied to PDs in recognition of the small size of some of these, and the need for them to operate though aggregators. However, members felt that it may be difficult to audit and could interact with other national legislation. Also, such a function for producers is not allowed for energy suppliers, who may wish to appoint a proxy to act of their behalf. This may constrain market facilitators. However, it was not intended that this should constrain market parties, but to make such actions transparent in order to prevent fraudsters acting improperly. It is important that this does not constrain trade, and any secondary market based on GOs (such as forward, futures		Rephrase for clarity. + Await advise from VAT prevention authorities after meeting with FaStGO.	4.6 rephrased: The provisions of a National GO Scheme shall secure that a GO can only be owned by the Account Holder of the Account in which that GO resides. An exception is when the first owner of the GO after its issuing gives a proxy to another account holder to act on its behalf.

		and options contracts). However, it is believed to be acceptable for exchanges as it was the text used by an exchange; and a precedent for this is to be found in the laws of Germany and other countries. A possible addition to the text might be "owner or operator", but this raises issues concerning the definition of an operator. The matter will be referred for further consideration to tax fraud authorities, including the Europol EMPACT MTIC project, which will meet on 26th June with FaStGO.			
Eurogas	4.7.3.2	Issuing bodies should undertake reasonable endeavours to complete the transfer with regards to all missing information, not only the account number.	then each such Competent Body shall use reasonable endeavours to exchange information such that any missing details to satisfy	the latter part of the sentence relates only to cases where the account number is erroneous, but can be adopted indeed	adopted

			its Criteria as set out in 4.7.2 and the correct account number can be identified,		
UBA	4.7.3.3	UBA is also concerned that this standard proposal could prevent free movement of goods, and so this paragraph should be legally checked before approving it. This also applies for import restrictions and any other cases.		advice asked to CEN secretariat, who forwarded to legal check at CCMC, awaiting response	None unless CEN would advise this goes beyond standard mandate
Fingrid Oyj	4.7.3.3	Restrictyion of exports must be checked if this is possible to write to a standard?	Definition might not be relevant	advice asked to CEN secretariat, who forwarded to legal check at CCMC, awaiting response	None unless CEN would advise this goes beyond standard mandate

Association ECS Switzerland	4.7.3.3 and §4.7.3.4	See also point on „EN 16325 as overarching standard" above §4.7.3.3a) to be altered: Usage for National Disclosure (regulated for electricity in RED II) is only one of the possible GO-usages. Disclosure within GHG-Protocol etc. must also be supported by the EN 16235. As well as disclosure for other GOs for other energy carriers in other disclosure schemes than National disclosure schemes. §4.7.3.3b) to be deleted: All GOs from all energy types can be exported to all qualifying Issuing Bodies (in RED II only the acceptance of electricity GOs for National Disclosure in Member States and also in relevant EEA-states is regulated) §4.7.3.3c) to be altered: Ex Domain Cancellations (EDC) of GOs must still be possible if a) the electronic system of the	§4.7.3.3a) to be altered: Usage for National Disclosure (regulated for electricity in RED II) is only one of the possible GO-usages. Disclosure within GHG-Protocol etc. must also be supported by the EN 16235. As well as disclosure for other GOs for other energy carriers in other disclosure schemes than National disclosure schemes. §4.7.3.3b) to be deleted: All GOs from all energy types can be exported to all qualifying Issuing Bodies (in RED II only the acceptance of electricity GOs	your comment to §4.7.3.3a) => Disclosure is defined as "Provision of information to a final customer on the share or quantity of the energy supplied to them as having specific Attributes". That covers all further purposes of disclosure. Zero GHG value (disclousure for GHG accounting) is a side effect of disclosure and as such there is no need to include a reference to the GHG protocol in the standard. // Your comment to §4.7.3.3b) to make the technical criteria for export ruling rather than political ones => this could work indeed: it requires the checks on avoidance of double disclosure and requirements of EN16325 to be met, which could be proven with an assessment report of the Domain GO Scheme // Your comment to 4.7.3.3 c) => Ex domain cancellations are covered in 4.9.2 Cancellation, and are not considered to be an export. // Your comment to §4.7.3.4b) => Follows directly from REDII art. 19. Follows directly from REDII art. 19.11. Doesn't change by making it implicit in the standard nor by removing it.	If the export restriction cannot reciprocate the import restriction of art. 19.11 of REDII, Consider replacing the text in 4.7.3.3 b) by "to another Issuing Body for a country outside the European Union, unless an assessment report as in 4.11.2 proves compliance of the importing Domain GO Scheme with this EN16325 standard, and a system for verification of Disclosure Statements as in 4.11.5 is in place, of which the residual mix is calculated in connection and in balance with

		respective Issuing Body is not implemented yet or b) if a given electronic Database of an Issuing Body can only be used to cancel GOs for the National Disclosure (then Exports for e.g. GHG-protocol disclosure must be done via EDC to this country) §4.7.3.4b) to be deleted (arguments see above) §4.7.3.4c) to be deleted (arguments see above) The same goes with 4.9.2.1.4.b).1): to be deleted	for National Disclosure in Member States and also in relevant EEA-states is regulated) §4.7.3.3c) to be altered: Ex Domain Cancellations (EDC) of GOs must still be possible if a) the electronic system of the respective Issuing Body is not implemented yet or b) if a given electronic Database of an Issuing Body can only be used to cancel GOs for the National Disclosure (then Exports for e.g. GHG-protocol disclosure must be done via EDC to this country) §4.7.3.4b) to be deleted		the system for calculation of the residual mix of the exporting country.”

			(arguments see above) §4.7.3.4c) to be deleted (arguments see above) The same goes with 4.9.2.1.4b)1): to be deleted		

EECS Unit	4.7.3.3 Restrictions of export	The EECS Unit supports this, provided it can be supported by legal opinion The standard should not prevent free movement of goods, as this may be challenged in law. Art.19(11) links GO import to import/export of energy, which suggests that exports might also be linked in the same way. A further consideration is that the purpose of GOs is as proof to consumers, which infers that such consumers are in Europe.		advice asked to CEN secretariat, who forwarded to legal check at CCMC, awaiting response	None unless CEN would advise this goes beyond standard mandate

ENTSOG	4.7.3.3(b) Restrictions of exports	Point b) in 4.7.3.3. looks inconsistent as it implies that export of GOs is allowed in the absence of the direct import or export of energy which is not the case with the import outlined in point c) of 4.7.3.4. It seems that export of EU GOs to third countries (e.g. Norway) would be allowed even in the absence of the physical trade. This might result in the leakage of GOs from the EU. We suggest that the transfer of GOs to and from third countries (export and import) and their recognition shall be governed by the same rules and be based on the principles provided in Article 19(11) of RED II, i.e. Member States shall not recognise guarantees of origins issued by a third country except where the Union has concluded an agreement with that third country on	4.7.3.3 Restrictions of exports An Issuing Body may not transfer (or attempt to transfer) a GO: ... b) to another Issuing Body for a country outside the European Union, unless the European Union has concluded an agreement with that country under Article 19, subparagraph 11 of the RES Directive and only where there is direct import or export of energy.	Legal advice asked to confirm that EEA countries are to be considered as Member States in the context of art. 19.9 and 19.11 of REDII. Answer: Countries of the EEA are not to be regarded as third countries as the EEA agreement is in place (Agreement on the European Economic Area). Indeed article 11 and 12 of the EEA Agreement states that quantitative restrictions on imports, exports or measures having equivalent effect shall be prohibited between the Contracting Parties. Also, REDII is marked as acquis communautaire, meaning EU legislation that is to be transposed into national legislation by EEA countries. this applies also to contracted parties to the Energy Community: art.41 of the Energy Community Treaty contains the same provision, however with the nuance that this shall not preclude quantitative restrictions or measures having equivalent effect, justified on grounds of public policy or public security; the protection of health and life of humans, animals or plants, or the protection of industrial and commercial property.	None (unless legal advice would see EEA countries as different than Member States)

		mutual recognition of guarantees of origin issued in the Union and compatible guarantees of origin systems established in that third country, and only where there is direct import or export of energy.			
Eurogas	4.8.2	"unjust enrichment" is too vague to be decided by an issuing body – it must be subject to judicial procedure between the GO owners. The obligation of the issuing body should be limited to ensure correct information is carried by the individual GO	Delete: "b) it is reasonably satisfied that any unjust enrichment of the Account Holder as a consequence of such error has, to the extent reasonably practicable, been	There are limits to what the standard can accomodate and this has proven to work in practice. Escalating to a judicial procedure should not be the first step and can still take place afterwards if relevant.	None

			nullified; and c) it is reasonably satisfied that the Alteration or Withdrawal itself does not give rise to undue enrichment of the Account Holder.”		
ENGIE	4.9. Expiry	We support a harmonization of the validity of the GO of 12 months. Shorter periods (e.g. monthly expiry) will result in decreased market liquidity, and higher price volatility.		Thank you for the endorsement	None
Statkraft	4.9.2.1.2	Allowing a wider selection of account holders to perform cancellations ensures proper consumer's choice and does not limit cancellations to national energy suppliers	0	Thank you for the endorsement	None
Renewable Energy Association (Poland)	4.9.2.1.2 f)	We ask for information on which situations / processes the wording "supply in bulk" refers to. Is it about transport in containers, e.g. for liquefied gas?		indeed, for transport by vehicle in general	none
Becour	4.9.2.1.3 Cancelling a GO	The sentence about "18 months for cancelling" is hard to understand. Moreover, the fact that a GO may be cancelled until 18		We see the intention is to have same timeline for end of validity and expiry and although it would	None

		months after its creation is confusing as the lifetime of a GO is 12 months.		be clearest to have similar time limit for transfer and cancellation Art.19(3) is quite clear that the validity period for transfer is limited to 12 months. Therefore a maximum time of 12 months for transfer and 18 months for cancellation is to be granted. But national legislation may set both to 12.	
Statkraft	4.9.2.1.4	Better to have harmonization of 12 months for production and cancellation	A GO may be Cancelled until twelve (12) months after the last day on which the Output to which the GO relates was produced, or until such earlier deadline as the relevant National GO Scheme provides.	We see the intention is to have same timeline for end of validity and expiry and although it would be clearest to have similar time limit for transfer and cancellation Art.19(3) is quite clear that the validity period for transfer is limited to 12 months. Therefore a maximum time of 12 months for transfer and 18 months for cancellation is to be granted. But national legislation may set both to 12.	None
Renewable Energy Association (Poland)	4.9.2.1.4	Regarding: "Maximum length of a consumption period being one calendar year." Our view is that GoO having a 12 months validity period shall be kept as it allows the flow of GoO's being issued to	0	Disclosure is usually performed at calendar month or year accuracy and therefore we propose that the maximum consumption period for which Gos may be cancelled is one calendar year. Take note that although we propose that the timing of consumption should be prior to the GO cancellation, we also enable that the disclosure	None

		be allocated constantly to the market for coming periods and all have equal value (theoretically). However during the analysis, there were doubts as to whether it is possible to cancel for a period of consumption that is within a one calendar year (i.e. maximum from 1 January to 31 December of a certain year), or that this period may not be longer than 12 months, but may extend beyond one calendar year - for verification.		period is still ongoing, i.e. that for example GOs may be cancelled in August of year X for disclosure period running 1.1.X - 31.12.X	
Eurogas	4.9.2.1.4	The standard should standardise the max cancellation period throughout the EU.	A GO may be Cancelled until eighteen (18) months after the last day on which the Output to which the GO relates was produced.	We want to allow also a shorter time limit in case a country wants to stick with the current 12 months for both transfer and cancellation	None

Eurogas	4.9.2.1.4	The text in b) is confusing as it reads "A GO shall only be cancelled […] before the date of cancellation of the GO […]". Plus: Consumption Period needs to be defined.	A GO shall only be cancelled for the purpose of Disclosure, and to demonstrate the origin of energy consumed: (a) within 12 months after the last day on which the Output to which the GO relates was produced; and (b) in the consumption period during which the Cancellation takes place.	The sentence in point b refers to the timing of energy consumption (rather than timing of cancellation) which must take place before the cancellation or during the same period. This prevents so called cancellation for future use. Therefore we would keep the current formulation. Take note that although we propose that the timing of consumption should be prior to the GO cancellation, we also enable that the disclosure period is still ongoing, i.e. that for example GOs may be cancelled in August of year X for disclosure period running 1.1.X - 31.12.X	None
UBA	4.9.2.1.4 Limitations for Cancellation	No.		Thanks for the support	none
EECS Unit	4.9.2.1.4 Limitations for Cancellation	This prevents GOs being cancelled for future use, and for use too far in the past.		Thank you for the endorsement	None

ENTSOG	4.9.2.1.4 Limitations for Cancellation	The first line in point (b) seems to be tautological. It might be deleted. The wording in brackets on the length of consumption below [ ] also seems redundant in a view of points a) and b) and could be deleted.	4.9.2.1.4. Limitations for Cancellation… A GO shall only be cancelled for the purpose of Disclosure, and to demonstrate the origin of energy consumed: ... (b) [before the date of cancellation of the GO, or] in the consumption period during which the Cancellation takes place. [Maximum length of a consumption period being one calendar year]....	The sentence in point b refers to the timing of energy consumption (rather than timing of cancellation) which must take place before the cancellation or during the same period. This prevents so called cancellation for future use. Therefore we would keep the current formulation. However we welcome the addition of brackets for clarity as indeed the first half of sentence b is more descriptive.	Addition of brackets in the following sentence (4.9.2.1.4): (b) [before the date of cancellation of the GO,] or in the consumption period during which the Cancellation takes place.
Gaz Réseau Distribution France (GRDF)	4.9.2.1.4, Limitations for Cancellation	European legislation (RED II) doesn't impose any limit regarding consumption period. The only rules mentioned in the Directive regarding cancellation of GOs is to	Delete this sentence or at least mentionned that it is an option. Example: Member States may precise that	It is not intended that consumption period should always be a month, but rather calendar year should be enabled. This comes from the fact that electricity suppliers need to yearly disclose their supply mixes. While the provisions of disclosure	None

		consume it maximum 12 months after the last day of the MWh production. This period is not a calendar year: a GOs linked to a MWh produced in december 2020 can be used until december 2021. It is not appropriate to limit consumption period of this GOs to one month (if we follow the mention of this standard). It is not up to the standard to go further European rules on GOs cancellation period; especially when it is imposed to each energy carrier such as those with long term storage capacities such as gas.	maximum length of a consumption period is one calendar year.	are less clear for other energy carriers, we consider having a maximum consumption period of 1 year adds clarity to the GO system. Take note that although we propose that the timing of consumption should be prior to the GO cancellation, we also enable that the disclosure period is still ongoing, i.e. that for example GOs may be cancelled in August of year X for disclosure period running 1.1.X - 31.12.X	
Nvalue AG	4.9.2.1.4. b) 5	We are on the opinion that the text is still unclear and allows for multiple interpretations. We would support the current situation with equal 12-months period of both validity and expiry.		We see the intention is to have same timeline for end of validity and expiry and although it would be clearest to have similar time limit for transfer and cancellation Art.19(3) is quite clear that the validity period for transfer is limited to 12 months. Therefore a maximum time of 12 months for transfer and 18 months for cancellation is to be granted. But	None

				national legislation may set both to 12.	
Statkraft	4.9.4	Better to have harmonization of 12 months for production, expiry and cancellation	0	We see the intention is to have same timeline for end of validity and expiry and although it would be clearest to have similar time limit for transfer and cancellation Art.19(3) is quite clear that the validity period for transfer is limited to 12 months. Therefore a maximum time of 12 months for transfer and 18 months for cancellation is to be granted. But national legislation may set both to 12.	None

Association ECS Switzerland	4.9.4 (and §3.1.27), §4.9.2.1.4	In RED II, Art. 19.3. the wording is as follows: "3. For the purposes of paragraph 1, guarantees of origin shall be valid for 12 months after the production of the relevant energy unit. Member States shall ensure that all guarantees of origin that have not been cancelled expire at the latest 18 months after the production of the energy unit. Member States shall include expired guarantees of origin in the calculation of their residual energy mix." In the referred paragraph 1 the wording is: "1. For the purposes of demonstrating to final customers the share or quantity of energy from renewable sources in an energy supplier's energy mix and in the energy supplied to consumers under contracts marketed with reference to the	"A GO ceases to be eligible for Transfer, and subsequently, Cancellation eighteen months (or such shorter period as the relevant National GO Scheme provides) after the end of the period during which the Output to which it relates was produced. The Issuing Body shall record the status of a GO which has ceased to be eligible for Cancellation as Expired in the Registration Database in which it is held at such time.“ §4.9.2.1.4 has to be altered accordingly.	We see the intention is to have same timeline for end of validity and expiry and although it would be clearest to have similar time limit for transfer and cancellation Art.19(3) is quite clear that the validity period for transfer is limited to 12 months. Therefore a maximum time of 12 months for transfer and 18 months for cancellation is to be granted. But national legislation may set both to 12. It is better if the EU legislative framework provides for better harmonisation of cancellation timeline, as it is hard to reach consensus on the operational side with interlinkage to other national registration systems.	None

		consumption of energy from renewable sources, Member States shall ensure that the origin of energy from renewable sources can be guaranteed as such within the meaning of this Directive, in accordance with objective, transparent and non-discriminatory criteria." The first and the second sentence in RED II, Art. 19.3 are not on the same level and don't regulate the same: 1st sentence: Provision in regard to Disclosure (as pointed at in the beginning of the sentence) 2nd sentence: Provision in regard to GO itself (respectively the GO-lifetime) Unfortunately the 2 sentences have been put in the same paragraph (which it complicates a lot, as also stated in the explanatory paper, page			

		4ff "Explanatory notes to the proposal for a revised EN16325 standard on guarantees of origin“) The first sentence in Art. 19.3: Validity of the disclosure-period (see reference to paragraph 1 made in the beginning of the sentence): means, that disclosure periods shall not be longer than 12 months away from the point in time of production (but nothing is said in this first sentence regarding transfer or trading of GOs). In consequence of the first sentence, the (maximum) duration of a disclosure period is 12 months (but can be shorter, depending on national legislation). So for instance we have a disclosure where you only can use GOs of the same years production, for 2020-disclosure only GOs with production in 2020 etc.) The second sentence			

		makes a saying about maximum lifetime of the GOs of 18 months (after production). In consequence GOs are transferable (and tradable) until 18 months after production. In consequence of the second sentence, the maximum lifetime of GOs is 18 months (but can be shorter, depending on national legislation). So for instance for our 2020-disclosure (see above) you have time for cancelling the 2020-production until mid of 2021. The residual mix can be calculated European wide by defined date, considering all expired GOs of a domain The meaning of the first sentence of the RED II, Art. 19.3 is already included in the proposal EN 16325, §4.9.1c) and § 4.10, Disclosure			

		statements: "A National GO Scheme shall contain provisions for Disclosure Statements for energy from RES with regard to the timing of their publication and their visual presentation." This can, and is, in the subject of Electricity disclosure, as regulated in RED II, Art. 19.3, a max. Disclosure period of 12 months. Important: For other purposes with Electricity GOs and GOs from other energy carriers this can be different (as all these cases are not regulated in the RED II). The same for all purposes and all GOs from all energy carriers is the end of lifetime after 18 months at latest.			

UBA	4.9.4 Expiry	"A GO ceases to be eligible for Transfer twelve (12)..." Does that mean, a GO older than twelve months but younger than 18 months and thus not expired a) is not transferable within a Registration database or/and b) is not exportable/importable. This is a question for clarifying.		Yes it is no longer transferrable, but may be cancelled by its holder. National rules may align expiry and validity, but the directive introduces possibility of differing timelines.	None
EECS Unit	4.9.4 Expiry	The EECS Unit supported this		Thank you for the endorsement	None
EnBW Energie Baden-Württemberg AG	5.1.	Additional information CO2 emissions /carbon footprint See 4.5.1.2 d: "a quantification of carbon footprint, of the Output covered by the GO Annex x provides guidance regarding the quantification of carbon footprint for the purpose of this standard;"	Optional information on GOs in general, -> 5.0 (NEW)	It is not sure what the comment aims to achieve?	none
Fortum	5.1.8	REDII is not having specific layers of GoOs.	Self consumption needs also to be	Consider as a whole. If the concept of tradeable GOs is replaced,	Consider replacing

		Tradable is not mentioned in directive and does not bring additional benefit for system. GOs must be issued on the request of a producer, which is eligible to get GOs. The basic principle is that national disclosure cannot allow double disclosure and there is also regulatory framework for supervising the system. This is national disclosure legislation, not the text for the technical standard.	covered by GoOs and taken into account in residual mix calculations.	additional measures should be installed to prevent double disclosure of the same attributes. That is relevant for the standard, as it undermines credibility in the GO system if level of quality assurance is different between countries.	concept of tradeable vs non-tradeable GOs by addition of an attribute on the GO that identifies the disseminiation level of the physical energy for which the GO is issued. Accompanied by a statement that the consumption and production of this energy should be incorporated in calculation of the residual mix if not cancelled immediately upon issuance.
Statkraft	5.1.8	If consumption of on site production is able to be included in National and European Fuel Mix disclosure, then Onsite production should be issued non transferable GoOs. This allows a rooftop PV in an IKN grid to receive GoOs and not	have a 3rd bullet point stating: For IKN networks non transferrable GoOs will be issued allowing producer to claim renewable / non renewable self	Agree to integrate this concern.	Consider replacing concept of tradeable vs non-tradeable GOs by addition of an attribute on the GO that identifies the disseminiation

		have to buy GoOs in the market. Keeps the principle that the only way to be green is through GoOs.	consumption, with FMD capturing this for statistical purposes.		level of the physical energy for which the GO is issued. Accompanied by a statement that the consumption and production of this energy should be incorporated in calculation of the residual mix if not cancelled immediately upon issuance.
Fingrid Oyj	5.1.8	Definiton of tradable is not clear.	All production should have a level playing field. Double disclosure is prevented by cancellation requirement	Consider as a whole. If the concept of tradeable GOs is replaced, additional measures should be installed to prevent double disclosure of the same attributes. That is relevant for the standard, as it undermines credibility in the GO system if level of quality assurance is different between countries.	Consider replacing concept of tradeable vs non-tradeable GOs by addition of an attribute on the GO that identifies the disseminiation level of the physical energy for which the GO is issued. Accompanied by a statement that the consumption and production

					of this energy should be incorporated in calculation of the residual mix if not cancelled immediately upon issuance.
Association ECS Switzerland	5.1.9	Although only pointing at electricity GOs, the restriction set in §5.1.9 (cancellation for disclosure has to be done until 1st of April in the following calendar year) is in conflict with the provisions set in RED II, Art. 19.3 (see point on GO-expiry above) and Art. 19.4. The provision as actually stated in §5.1.9 intervenes in unjustified way in the sovereignity of the respective National Competent Bodies for National Disclosure. Furthermore it potentially intervenes with other regulations such as GHG-Protocol etc. in the subject of GO-cancellation in a unjustified way.	§5.1.9: To be deleted	The provision doesn't say that disclosure of year X would have to be made with production year X Gos. Hence it doesn't limit the lifetime of Gos to anything less than the national legislation. It only restricts the timeline during which cancellations for year X disclosure can be made but any leftover GOs of production year X can still be used for disclosure during X+1. On a European level we would propose a harmonized deadline, which would be best placed on 1.4. This is FaStGO's proposal, but ultimate decision will be made by CEN and national deviations might be unavoidable. We do not see how the regulations of the GHG protocol could be in conflict and in any case the reliability of the GO system is primary. Although we acknowledge the importance of the GHG protocol in this regard, but our	None

				first objective is on the legal basis of GOs.	
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	5.1.9	It is unclear, why the GO must be cancelled by 1 April of the following year? In Germany, the GO is needed until the end of August of the following year, because all data for electricity labelling from 1.11. are only available in August.	Modify: "To disclosure the attributes of Electricity consumed in any given calendar year, a GO shall be cancelled before the 1. September of the following calendar year."	On a European level we would propose a harmonized deadline, which would be best placed on 1.4. This is FaStGO's proposal, but ultimate decision will be made by CEN.	None

EnBW Energie Baden-Württemberg AG	5.1.9	To disclosure the Attributes of Electricity consumed in any given calendar year, a GO shall be cancelled before the 1. April of the following calendar year." Why must the GO be cancelled by 1 April of the following year? In Germany, I need the GO until the end of August of the following year, because all data for electricity labelling from 1.11. are only available in August.	5.1.10 "To disclosure the Attributes of Electricity consumed in any given calendar year, a GO shall be cancelled before the 1. September of the following calendar year."	On a European level we would propose a harmonized deadline, which would be best placed on 1.4. This is FaStGO's proposal, but ultimate decision will be made by CEN.	None
EnBW Energie Baden-Württemberg AG	5.1.9	Why is the limitation of the GOs not described in the general part? Should there be separate deadlines for electricity, gas and heat/cold? These attributes should be described in the general part for all GOs.	Move to chapter 4	The disclosure system for other energy carriers is still very much in development and it is still unsure to which timelines these can adhere to	None
Fingrid Oyj	5.1.9	Definition of tradable GOs is unclear. There no definition for how many customers are needed in the RED II		Comment is unclear. Is this the same as the comment relating to 5.1.8?	
Becour	5.1.9 Limitations for Cancellation of GOs	We really agree with the fact that all Europe should have the same date to cancel GOs for Electricity Disclosure.		Thank you for the endorsement	None

	for Electricity				
ENGIE	5.2 Hydrocarbon gas	Naming these gases "hydrocarbon gases" could be perceived negatively as it suggests that these gases are more carbon-intensive then e.g. hydrogen or electricity	Call the category "methane and other gases" or just "gases"	this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none
EnBW Energie Baden-Württemberg AG	5.2, 5.3 and 5.4	How does the proposal take account to Article 29 RED II? 1. Sustainability 2. greenhouse gas emissions saving criteria for biofuels, bioliquids and biomass fuels used for electricity generation, transport and heat generation	Optional Datafield for Sustainability and greenhouse gas emissions saving are required	Thanks, text incorporated, using elements from the corresponding text of the EECS Gas Scheme and suggestions from other respondents to this consultation. GHG Saving criteria	text in 5.2 updated with additional optional attributes on HC gas GOs
EnBW Energie Baden-Württemberg AG	5.2.	The RED II uses "gas, including hydrogen;" and in this proposal the term "gas" is often used. See also Directive 2009/73/EC for natural gas-> uses "gas". Therefore we should stick with "gas". See proposal Comment 5	5.2 Gas including Hydrogen.	this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none
GRTgaz	5.2.08	add a paragraph 5.2.8.5 stating clearly the possibility to mention an attribute in relation		agree, this information can be integrated in the design of the	proposal of Entsog adopted

		to GHG emission saving, allowing then a consumer to use the GO for ETS purpose and more generally a purpose related to the demonstration of emission saving.		electronic document. It facilitates further development of the links between several purposes	
AGCS Gas Clearing and Settlement AG	5.2.1 applicability	This section is very generic.	It should include information on the types of hydrocarbon gas, particularly renewables. At least the corresponding definitions of section 3.1.XX should be mentioned.	It is indeed the purpose to be very generic, so that it applies for all hydrocarbon gases. Specific arrangements for renewable hydrocarbon gases are in dedicated articles.	none
AGCS Gas Clearing and Settlement AG	5.2.1 applicability	The current text proposal does lack some clarification on the distinction on the "renewable" and "fossil" origin of hydrocarbon gas. Specifically, in the section of hydrocarbon gas, the production process for renewables brings several particularities. It seems sufficient to disclose the renewable character of hydrocarbon gas as all residual volumes are fossil. Due to the very continuously declining	Clarification is needed on the documentation of fossil gas extraction facilities if needed at all and the import from third party countries.	this categorisation is foreseen in the data field 'source type on the generic go'. Standard is foreseen to apply also on non-renewables in accordance with art. 19of REDII	none

		production volumes of fossil gas within the European geographical scope, it might be efficient to abstain from documenting fossil hydrocarbon gas as well as imports from third countries. Most likely, all of the non-categorised gases in the Annex of the EN16325 standard will be fossil, independent if produced in Europe or in third countries.			
AGCS Gas Clearing and Settlement AG	5.2.10 Relevant perimeter	Is this section specific for gaseous energy carriers or actually for all energy carriers?	None.	aims to specify the generic rule in terminology applicable for Hcgas	none

ENTSOG	5.2.2 (a) Additional application information for the registration of a Production Device	We suggest using the word 'network' for the gas infrastructure as the one which is provided in the Gas Directive. Moreover, it might be the case that the plant will have both network injection point and the 'point where the gas becomes available for trade'. In this case both of the points should be indicated as each of them may have different measurement bodies.	5.2.2 (a) Additional application information for the registration of a Production Device In addition to the requirements set out in 4.4.1.4, the following information shall be provided to the Issuing Body: a) Plant description and layout of the plant, including the Technology Type as mentioned in Annex B and the location within the production site, of the Production Device, Auxiliaries, compression substations, location of onsite	thanks, improvement adopted	Changed as proposed

			consumption of the gas, and network injection point and/or the point where the gas becomes available for trade, on which the positions of the relevant Import and Export Meters are indicated;		
EnBW Energie Baden-Württemberg AG	5.2.2 a.	The additional application information under point a is too extensive. This detailed query is made by the regular environmental report.	Technology Type as mentioned in Annex B and the location of the Production Device,and grid injection point or the point where the gas becomes available for trade, on which the positions of the relevant Import and	is relevant for determining amount of GOs to be issued and for ex post inspection of correct measurement reporting	none

			Export Meters are indicated;		
AGCS Gas Clearing and Settlement AG	5.2.2 Additional application information for the registration of a Production Device First sentence	This sentence should be exactly the same as in the electricity part.	Copy and paste as: "In addition to the requirements set out in 4.4.1.4, the following information shall be provided to the Issuing Body, but needs not be recorded in its Registration Database:"	thanks, improvement adopted	Changed as proposed
AGCS Gas Clearing and Settlement AG	5.2.2 Additional application information for the registration of a Production Device Point b, subpoint 5 “electroly	A clarification in the introduction of chapter 5.2 hydrocarbon gas is required. It shall be clarified if the generation of hydrocarbon gas from electricity via electrolysis is covered in this chapter.	None.	it is not excluded, so it is included. Such description would require a long list. The list in Annex B2 and B3 shows theincluded technologies	none

	ser capacity”				
AGCS Gas Clearing and Settlement AG	5.2.2 Additional application information for the registration of a Production Device Sentence of point b	Wording is not clear, not a full sentence.	The full sentence should be: "In addition to the information on the capacity of the gas Production Device, where applicable, information on the nominal capacity of the following, needs to be provided to the Issuing Body"	that would distort the currently grammatically correct sentence of the integral paragraph	none
German Energy Agency (Deutsche Energie-Agentur, dena)	5.2.2 Additional application information for the registration of a Production Device, number a)	The plant description for renewable hydrocarbon gases of biological origin should include the following information: 1. Fermenter size (m3) 2. Gas flare capacity (kWh/h) 3. Thermal redox capacity for the offgas (kWh/h) 4. Size of the digestate store (m3) 5. Digestate cover availability/existence (a	In case of a Production Device whose output is a renewable hydrocarbon gas of biological origin, the plant description should include the following information: 1. Fermenter size (m3) 2. Gas flare	the national GO scheme may require this information, but it is not necessary for a functional GO scheme. Once sustainability and GHG information is included, it however becomes relevant. But in that case it can also be that through another certification process this information is verified. Must not necessarily be the issuing body.	none

		simple yes/no) The units in which the information about each element in the plant description should be given are the ones widely used by the industry, so there is no need to look for new or alternative units to express the capacity of each element.	capacity (kWh/h) 3. Thermal redox capacity for the offgas (kWh/h) 4. Size of the digestate store (m3) 5. Digestate cover availability/existence (a simple yes/no)		

German Energy Agency (Deutsche Energie-Agentur, dena)	5.2.2 Additional application information for the registration of a Production Device, number a)	The auxiliaries concept does not apply in the renewable hydrocarbon gas production. For example, it is difficult to differentiate between renewable and non-renewable electricity used by the production plant and to show which part of the total electricity consumption was renewable and non-renewable. On top of that, electricity consumption for lightning, electronic and electric appliances (e.g. coffee machine, computers, printers) is hard to determine and deduct from the total gaseous energy output. The net energy output for a consignment of renewable hydrocarbon gas can be calculated as follows: E_net_GO = P_gross_RH - G_fossil_blend - C_gas_production	Delete "Auxiliaries" from number a)	when auxiliary energy of other energy carrier is small, it can indeed be considered not to deduct it, for avoidance of administrative overkill. Once substantial quantities of auxiliaries, it is essential for consumer credibility of the GO system to address them.

		where: E_net_GO is the net energy eligible for a GO. P_gross_RH is the gross production of a Renewable Hydrocarbon Gas Production Device, G_fossil_blend is the fossil methane and/or other fossil hydrocarbon gas blended in, and C_gas_production is the consumption of gaseous energy in course of the Renewable Hydrocarbon Gas production			
German Energy Agency (Deutsche	5.2.2 Additional applicatio n	Why is it necessary to know the location of the compression substations for issuing GOs? This	Delete "compression substations" from number a)	this chapter also applies for gases which are not injected into a network, for which it is relevant to determine correct amount of GOs	none

Energie-Agentur, dena)	information for the registration of a Production Device, number a)	information is not necessary. The compressors belong to the injection plant, but the meter is placed just after the injection plant to measure the gas output, which is what really matters for issuing the GOs.			
German Energy Agency (Deutsche Energie-Agentur, dena)	5.2.2 Additional application information for the registration of a Production Device, number b)	2. The capacity of the liquefaction plant must be expressed in usable units. For this purpose, "tonnes per hour" is more suitable than "tonnes per annum". 3. The fermenter is part of the plant description, so no need to include it in the list proposed by the draft Standard. 4. The electrolyser capacity should be listed together with the capacity of the methanation plant because they belong to the same production process: production of hydrogen through electrolysis and methanation of this	2. Liquefaction plant (in tonnes per hour) 3. Delete "fermenter (in volume)" and include it with the plant description from number a) 4. Electrolyser and methanation plant capacity (both in energy units per hour) 5. Delete "electrolyser capacity (in energy units per hour)"	fermenter size gives issuing body an idea of production capacity realism. Argument for deleting c is missing.	tonnes per hour

		hydrogen to obtain synthetic methane as end product. c. Consider deleting "…the upgrading unit became operational in case the Output of…" and "…is Network Compatible Gas." to include all possible technology options, depending on the Production Device.	c. Date on which the Production Device became operational.		
EnBW Energie Baden-Württemberg AG	5.2.2 b.	From 1. to 5. Only energy units per hour should be required No. 3. fermenter is not relevant The steam reforming of biogas to hydrogen should be included here.	Proposal: 1. raw gas production plant and of the gas upgrading plant: (in energy units per hour); 2. liquefaction plant (in energy units per hour); 3. methanation plant (in energy units per hour); 4. electrolyser	thanks, steam reformer capacity added. fermenter size gives issuing body an idea of production capacity realism.	steam reformer capacity

			capacity (in energy units per hour). 5. Steam reformer capacity (in energy units per hour).		
EnBW Energie Baden-Württemberg AG	5.2.2.	"Date on which the upgrading unit became operational in case the Output of the Production Device is Network-compatible Gas" This is also relevant for other production devices which produce non-Network-compatible Gas. Example: Hydrogen (steam reforming of biogas) => The start of the operational can be relevant for the requirements on GHG reduction	Proposal: Date on which the Production Device unit became operational.	that date is already on the GO, see 4.5.1.1	none
ENTSOG	5.2.2.b.5 Additional application	It is not clear in which cases capacity of electrolyser should be indicated as a part of		is applicable when there is an electrolyser, for whatever production of final product	none

	information for the registration of a Production Device	additional application information for the registration of a Production Device: only where hydrogen is produced or in some other cases. In case of hydrogen production, it might be necessary to add other hydrogen related technologies such as steam methane reformer etc.			
GRTgaz	5.2.20	replace hydrocarbon gas by gas		this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none
AGCS Gas Clearing and Settlement AG	5.2.3 Qualification criteria for Production Devices	This chapter is redundant with the applicability chapter 5.2.1.	This information should be incorporated into chapter 5.2.1 and then this chapter should be deleted.	is part of current text build-up integration with 4.4.1.2	none

KU Leuven	5.2.4	A criterion verifying the origin of CO2 is lacking. One should always be obliged to report the origin of CO2, so as to be able to obtain green GO's (according to technology code G0301XX or M0302XX (see other comment)). If this is not complied with, the GO should clearly indicate that the CO2 is not of renewable origin (e.g. direct air capture or biomass). Moreover, if a chemical conversion process is used with < 100% CO2 conversion and without recycling, additional CO2 (not related to energy use) is emitted into the air at the site.	Additional criterion: "The origin of the CO2 input and the amount of CO2 input required for 1 MWh of gas"	We'll pass it on to be considered in the CEN group on hydrocarbon gas	
EnBW Energie Baden-Württemberg AG	5.2.4	5.2.4. c. It is not clear which criteria are meant here.		No comment	none
AGCS Gas Clearing and	5.2.4 47 Additional criteria	Production devices for hydrocarbon gas should be considered as	Should be deleted because not relevant/not applicable for	when auxiliary energy of other energy carrier is small, it can indeed be considered not to deduct it, for avoidance of administrative overkill. Once substantial	

Settlement AG	for issuing GOs	integrated plants without auxiliaries.	renewable hydrocarbon gas. During the production of renewable hydrocarbon gas, some parts of the production process need energy input. Fossil gas used will be deducted from the energy output in the gross/net calculation. Energy used on the production site, e.g. for lighting, heading of office/laboratory buildings shall be considered integral. The electricity used during the production process cannot be considered as an auxiliary because it cannot be directly obtained	quantities of auxiliaries, it is essential for consumer credibility of the GO system to address them.

			from the produced output (hydrocarbon gas).	
German Energy Agency (Deutsche Energie-Agentur, dena)	5.2.4 Additional criteria for issuing GOs, first paragraph, number a) "The amount of electricity, fuel and/or heat…"	It is incorrect to consider auxiliaries of any type other than gas during biomethane production. For example, it is difficult to differentiate between renewable and non-renewable electricity used by the production plant and to show which part of the total electricity consumption was renewable and non-renewable. On top of that, electricity consumption for lightning, electronic and electric appliances (e.g. coffee machine, computers, printers) is hard to determine and deduct from the total gaseous energy output.	We see two options: 1) Delete number a) in paragraph 1 from section 5.2.4: "a) The amount of electricity, fuel and/or heat consumption of the generation plant for 1 MWh of gas". 2) Proposed text: The National GO scheme shall consider issuing GOs for hydrocarbon gas if the electricity consumption for each MWh of hydrocarbon gas being does not exceed a threshold value	coffee machines are not auxiliaries. They are normal onsite consumption and don't need to be deducted. The fact that it is hard doesn't make it incorrect or unnecessary to maintain consumer credibility.

			established by each National GO Scheme.		
German Energy Agency (Deutsche Energie-Agentur, dena)	5.2.4 Additional criteria for issuing GOs, second paragraph (after the "Note")	Consider adding the "biogas production plant" as part of the list for which the National GO Scheme may provide for conditions for issuing GOs related to the maximum methane emissions.	a) biogas production plant; or	thanks, good suggestion	added as suggested
First Hungarian Biogas and Solar Ltd	5.2.4.	the text suggests that the Issuing body should deduct the non-gaseous energy from the gas volume - this is not practical and not feasible		when auxiliary energy of other energy carrier is small, it can indeed be considered not to deduct it, for avoidance of administrative overkill. Once substantial quantities of auxiliaries, it is essential for consumer credibility of the GO system to address them.	

ENTSOG	5.2.4. Additional criteria for issuing GOs	We suggest that terminology should be aligned throughout the text (i.e. 'generation plant' should be changed into 'production device' in point a). We also suggest that in point b) both contracts for technical and commercial access should be allowed to serve as a proof of connection to the network. We also suggest deleting a clause on methane emissions provided in brackets [ ]. It is questionable whether reduction of methane emissions should be in scope of the GO Standard. Moreover, this requirement might constitute a technical barrier for cross-border trade because in different EU MSs different conditions for GO issuance may apply. It should be reminded that the Standard aims for	5.2.4 In addition to the 4.5.3 an Issuing Body shall only Issue GOs for a Production Device if the following information in section...: a. The amount of electricity, fuel and/or heat consumption of the Production Device for production of 1 MWh of gas; b. Whether or not the Production Device is connected to a gas Distribution System or Transmission System (A system grid technical or commercial access contract with the gas grid network operator shall serve as	indeed hamper level playing field.	amended and deleted as proposed

		greater harmonization of these conditions.	proof); and To delete [The National GO Scheme may provide for conditions for issuing GOs to be related to 4.4.1], maximum methane emissions, defined in the national legislation, from the: a. biogas upgrading plant; or b. gasification plant; or c. liquefaction plant.]		
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	5.2.5	b) the type of gas, being either "Network compatible Gas" or "Other Gas"; this definition is unclear, please see also our comment regarding 3.1.47.	Delete b) or please explain further why this definition is needed.	(The definition is introduced to use it furhter in the text, in section 5.2. There is an additional mandatory data field on the GO that identifies the 'type of gas', being either 'network-compatible gas' or 'other gas'. The text proposes to only allow cancellation of the GO for the same type of gas as the actual type of gas	none

				consumed. Several parties wanted to restrict the gases to which the standard applies to those gases that are fed into the natural gas grid. Such restriction is not in line with RED II, but to facilitate maximum transparency, this attribute 'type of gas' = network-compatible gas, shall be used for all those gases.) The means of supply /dissemination level only identifies the first step: if the gas is transported by vehicle and later on injected into a gas grid, it can still qualify as 'network compatible gas' while a gas mixture after pyrolysis unlikely will qualify for this category of gases.	

ENTSOG	5.2.5 Obligatory additional information on a GO for Hydrocarbon Gas	We suggest deleting the attribute 'means of supply' or making it optional. It might not be compatible with a 'book and claim' principle used for the GO scheme. In particular, there is a risk that a shipper who bought a GO with a 'vehicle' attribute and then decided to change the means of supply from 'vehicle' to 'pipeline' will not be able to green a gas product supplied to network connected customers with that GO. To green its product, the shipper will need to buy a new GO with a different attribute or ask for GO reissuance (if it is possible). Thus, the shipper will incur additional transactional and administrative costs, which could be easily avoided if the means of supply are not indicated. As an alternative, the means of supply could be indicated upon request of the Production Device	5.2.5 Obligatory additional information on a GO for Hydrocarbon Gas In addition to the information in 4.5.1, a GO for Hydrocarbon Gas shall contain the following Attributes: - the type of gas depending on the production technology used, being either: 1) hydrogen or 2) biomethane, or 3) synthetic methane or 4) other (to be specified); To delete [Any gas that is injected into the Distribution or Transmission System for natural gas, shall be considered under the Type of Gas category	as explained in other reactions, this is an essential design criterion of the current proposal. It is compatible with book and claim, as it aims to only indicate how the gas is first disposed by the produciton device. Furhter depending on the outcome of the discussion on tradeable GOs. A data field on the GO should indicate whether or not it was injected into the gas grid, that is done through 'means of supply'. 'type of gas' is not meant to certify gas quality in detail, but to enable the end consumer to identify that the GO was issued for the same product he actually consumes.	none

		remaining an optional data field. Herewith, the attribute 'type of gas' shall rather indicate the gas type and technology that was used for production. Consumers and suppliers would benefit from such additional clarity and simplicity as a code of technology and a source type might be difficult to interpret and understand. At the same time, the subcategory 'Network compatible gas' seems to be redundant in the GO context. First, it is questionable whether the GO shall be used to certify the quality of gas – the feature which is important for the physical gas product and not for the climate value indication. Moreover, it does not have any added value for the consumer as all gas that is injected and transported by gas networks shall by default	of 'Network Compatible Gas'].		

		satisfy quality criteria verified and guaranteed by network operators.			

AGCS Gas Clearing and Settlement AG	5.2.5 Obligatory additional information on a GO for Hydrocarbon Gas Point a) the means of supply, being either: "injected in pipeline" or "transport by vehicle";	The definitions of "injected in pipeline" or "transport by vehicle" should be harmonised with hydrogen and other energy carriers. This might not be applicable for hydrocarbon gas but other energy carriers too. There might be a general field (attribute) necessary for all energy carriers. This could be moved to the general part of the Standard.	None.	relevant for hydrogen indeed. Moving to generic part pending the outcome on the discussion on tradeable GOs to be replaced by 'dissemination level of physical energy'	Pending the discussion in CEN on additional datafield on Generic GO on dissemination level of physical energy
AGCS Gas Clearing and Settlement AG	5.2.5 Obligatory additional information on a GO for Hydrocarbon Gas Referring to the last sentence.	Not a full sentence. The word "injection" is missing.	The full sentence should be: "Any gas that is injected into the Distribution or Transmission System for natural gas, shall be considered under the means of supply injected in pipeline and the	Agreed, thanks.	amended as proposed

			Type of Gas category of Network Compatible Gas"		
ENGIE	5.2.5. Obligatory additional information on a GO for Hydrocarbon Gas	In addition to the information in 4.5.1, a GO for Hydrocarbon Gas shall contain the following Attributes: a. the means of supply, being either: "injected in pipeline" or "transport by vehicle";" "Transport by vehicle" can be too restrictive	Call the attribute "other transport (e.g. truck, train, container, ship/barge…)"	Not clear what it restricts. Bullets are not functional for a standard	none

ENTSOG	5.2.6 Additional optional information in section on a GO for Hydrocarbon Gas	It is important for the market and policy makers to establish a link with sustainability certificates issued by respective verification schemes. This will enable the use of a GO for the EU ETS purposes and will help avoid double counting. We propose the following wording.	5.2.6 Additional optional information in section on a GO for Hydrocarbon Gas A GO for Hydrocarbon Gas may also contain the following information: a) information related to gas compliance with the sustainability and GHG emission saving criteria outlined in Article 29 of the RES Directive (where applicable), if it is made available in the confirmation documents provided by respective verification schemes according to Articles 30-31 of	agree, this information can be integrated in the design of the electronic document. It facilitates further development of the links between several purposes	adopted

			RES Directive. Upon request of the Production Device the Issuing Body shall indicate requisites of the respective confirmation documents and the data provided therein or otherwise disclose this information to participants of the National GO Schemes. Note: National GO Scheme shall enable indication of this information upon request of the Production Device which is audited and certified by respective verification schemes according to Article 30 of the		

			RES Directive. In this case, the Production Device shall provide the Issuing Body with the respective confirmation documents….		

EECS Unit	5.2.6 Additional optional information on a GO for Hydrocarbon Gas			thanks	none
German Energy Agency (Deutsche Energie-Agentur, dena)	5.2.6 Additional optional information on a GO for Hydrocarbon Gas, second paragraph "If the Output is produced from a mixture of Inputs, consisting of other than only the Input from the Source type…"	According to the Energy Input Factor formula in section 4.5.5.1.3, how could the energy content of a mix of energy crops be split into the individual components of the mixture to be able to calculate the Energy Input Factor of each crop in the mix? For example, if a mix of energy crops contains 20% maize, is there a standard value approved on a European level to calculate the energy content of that 20% of maize?	none	in that case a more high level data field can be selected (e.g. level 3), or the GOs can artificially be allocated proportionally to each of the inputs	none
AGCS Gas Clearing and Settlement AG	5.2.7.1 Hydrocarbon Gas GOs cancelled for Conversion Issuance	This paragraph is an exact repetition of 4.5.6.1.1 Clarification needed which conversion is meant here. The concept of energy carrier conversion is not yet sufficiently described.	Provide the information which conversion: which input energy carrier, which output energy carrier?	a standard is not an educational document. E.g. the FaStGO webinar was, and additional information documents can be drafted. This section in HC gas does provide additional information, as it relates to the 'type of gas' data field, which only applies for HC gas	none

		Considering that the technology and market are not yet highly matured, the conceptualisation is a difficult task. However, in the text proposal, it should be taken care of describing the type of conversion sufficiently in the respective section.			

ENTSOG	5.2.7.2 Hydrocarbon Gas GOs relating to hydrogen injected into the natural gas Distribution or Transmission System	We suggest aligning terminology on Nett Energy Production. Moreover, if the final version of the draft of the Standard keeps two types of GOs (for Hydrocarbon gas and pure Hydrogen), we suggest respective changes which clarify that conversion issuance takes place, only if another type of GO was issued before. Therefore, the cancellation of the initial GO should be mandatory. Moreover, it is not clear why attribute g) on the Source Type of 4.5.1.1. is not explicitly mentioned. It seems that the source type in this situation should remain the same and should be reflected in the GO.	5.2.7.2 Hydrocarbon Gas GOs relating to hydrogen injected into the natural gas Distribution or Transmission System Hydrocarbon Gas GOs may be issued for the Nett Energy Production of hydrogen for which no Hydrogen GOs have been issued and that is injected into the natural gas Distribution or Transmission System. When Hydrogen was produced in another place than the site from where it is injected into the natural gas Distribution or Transmission	Agreed with the full principle you propose. The current text already facilitates this. 1) Attribute on Source type remains the same indeed, as is already stated in the generic section. 2) Whether or not GOs have been issued for hydrogen that is transported, cannot be known in a book and claim system. 3) the word shall cannot be established if not cancellation of hydrogen GOs occurs. However the rule in 5.2.5 last sentence already establishes obligation. 4) editorial change adopted in Nett Energy Production of Hydrogen, thanks for pointing out.	editorial change

			System and for which Hydrogen GOs have been issued, Conversion Issuance for Hydrocarbon Gas GOs shall take place. Hydrogen GOs shall be cancelled in accordance with 4.5.6. In addition to 4.5.6.2.2, the Attributes on the GO that relate to the Production Device, as mentioned in 4.5.1.1 c), d), e), f), h), i), j), k), n), p) in this specific case only, shall refer to the Attributes relating to the Production Device mentioned on the cancelled GOs for Hydrogen.		

First Hungarian Biogas and Solar Ltd	5.2.7.2.	It would be much more transparent and trustworthy if the procedure followed the material word: first issuing GO for producing hydrogen, subsequently converting/exchanging the hydrogen GO with hydrocarbon gas GO to document the injection		That would install an unnecessary administrative burden and hence cost, and doesn't seem to benefit anyone (not the producer, not the registrant, not the issuing body, not the consumer).	none
German Energy Agency (Deutsche Energie-Agentur, dena)	5.2.8.1 Verification of an application for registration of a Production Device, second paragraph.	This paragraph refers to verifying that the Production Device is capable of producing the reported output from the energy source for which it is registered. We suggest simplifying the wording to make it more understandable.	As mentioned in 4.3.5.2, part of the verification's task is to document the possibility to obtain Hydrocarbon Gas from the energy source for which the Production Device is registered and within its technical limitations.	agreed, thanks	amended as proposed

ENTSOG	5.2.8.2 Verification of Consumption and Production declarations for Renewable Hydrocarbon Gas	We suggest mentioning transmission system operators as they can provide metering data on gases injected into their networks.	5.2.8.2 Verification of Consumption and Production declarations for Renewable Hydrocarbon Gas …. There are two options for performing such an inspection. In both cases the information must coincide with the information reported to the Issuing Body (or Production Registrar) responsible for the respective Production Device. a) Verification of Metering data by distribution or transmission system operators. The distribution or transmission system operators send the	agreed, thanks	amended as proposed

			metering data (manually or through an automated interface) to the respective Issuing Body (or Production Registrar).		
AGCS Gas Clearing and Settlement AG	5.2.8.2 Verification of Consumption and Production declarations for Renewable Hydrocarbon Gas	The description of data provision should represent actual cases, especially in cases when IBs have already been appointed. Data may be provided either directly or by a third party which can be different entities such as metering point administrators (special role in Germany), production registrar (Belgium) or Balance	Thus, the text shall be updated to: "Verification of Metering data by distribution or transmission system operators. The distribution or transmission system operators provide the metering data	Production registar is a term defined in this draft standard and covers the cases referred to in this comment	none

		Group Coordinator (Austria). Hydrocarbon gas production plants are in many cases connected to the transmission system.	directly (manually or through an automated interface) or through a third party (for example metering point administrator or Production Registrar) to the respective Issuing Body."		
Gaz Réseau Distribution France (GRDF)	5.2.8.2, Verification of Consumption and Production déclarations for Renewable Hydrocarbon Gas	Hydrocarbon gas production can also be connected to TSOs.	Add also the transmission system operators in the point a).	agreed, thanks	amended as proposed
German Energy Agency (Deutsche Energie-Agentur, dena)	5.2.8.3 Renewable Hydrocarbon Gas of Biological Origin:	It would be good to relate the inspection of the substrate specific data to the biomass codes listed in the table A.1 from Annex A.	In addition to 4.11.4, where the Output of a Production Device is Renewable Hydrocarbon Gas	agreed, thanks	inserted as proposed

	Inspection of substrate specific data		of Biological Origin, the Issuing Body (or Production Registrar) shall request an inspection of the substrate specific data (related to the ones included in table A.1 in Annex A) of the Inputs used by the Production Device to obtain the reported Output.		
ENTSOG	5.2.8.3 Renewable Hydrocarbon Gas of Biological Origin: Inspection of substrate specific data	It seems that in case of renewable biogas/ biomethane, producers might be inspected by the voluntary verification schemes in line with RED II (Article 29-31). In this case sustainability certificates issued by these schemes could serve as a proof of the input's quality and may substitute the proposed inspection. This could minimise the administrative burden for	5.2.8.3 Renewable Hydrocarbon Gas of Biological Origin: Inspection of substrate specific data … Provisions of 5.2.8.3 may not apply to Production Devices which are audited and	the terminology used doesn't prevent the sustainability inspection to replace any other one. Current text is still valid for using the inspection under art 30-31	none

		producers and costs related to additional inspections of the production device. If it is possible, we suggest adding a new paragraph.	certified according to Articles 30-31 of the RES Directive by respective verification schemes. In this case, the Production Device could be required to provide respective confirmation documents and may ask the Issuing Body to indicate relevant information in the GO according to 5.2.6 (a) or otherwise disclose it.		
AGCS Gas Clearing and Settlement AG	5.2.8.3 Renewable Hydrocarbon Gas of Biological Origin: Inspection of substrate	The concept is not clear and should be defined. Does an inspection change or does it not change attributes of the GO? What happens in the case, if the inspection data influence the	None	is regulated in generic part of the standard under data maintenance and error handling, see 4.8 . Inspection does not modify data on GO. Inspection is basis for issuing body to make corrections towards the future.	none

	specific data	attributes of the GO? Will the creation of the GO be postponed only until after the inspection was performed and the data provided?			
Gaz Réseau Distribution France (GRDF)	5.2.8.3, Renewable Hydrocarbon Gas of Biological Origin: Inspection of substrate specific data	To limit the administrative and economic burden on renewable energy producer, it will be more appropriate that the Member States decides the period in which the audit on the production device need to be updated in case of inputs from biological origin. Such flexibility will allow Member States to ensure consistency between GOs audit of the production device and other audits (for public support, RED II obligations for example). This will streamline the different audits to which renewable energy producer is subject.	Mentionned the "annual basis" timing only as a proposal in the standard.	can be done more frequently if desirable, but a minimum level of fraud prevention is necessary. a lot of fraudulent reporting can take place, e.g. declaring unrenewable inputs as renewable	none
AGCS Gas Clearing and	5.2.8.4 Guidelines for	The paragraph should be completed by adding the following sentence.	"The audits shall be reflected into a report of the Production	is implicit alreay	none

Settlement AG	Inspections		Auditor with a comprehensive explanation of the findings and results. Furthermore, it shall include information on GO attributes according to CEN16325."		
ENTSOG	5.2.9 Calculation of Nett Energy Production eligible for GO issuing	Measurements could be provided in energy units which already take into account calorific value. We suggest specifying this directly instead of making calculations with the calorific value.	5.2.9 Calculation of Nett Energy Production eligible for GO issuing In addition to the requirements in 4.5.4.2, the Output of a Hydrocarbon Gas Production Device is determined based on a flow measurement (to be expressed in kWh/ MWh)....	true, but in physical terms it is a flow measurement multiplied by calorific value. Text covers the practical cases this comment refers to	none
KU Leuven	5.3.	The origin of the water input should also be required application information. With drought problems increasing, at least having information concerning water consumption at		makes sense in terms of policy but goes much beyond the current purposes of the GO system. A (hydrogen) label could facilitate such info and link it to the GO.	none

		hydrogen production sites is useful for future policy measures.			
ENTSOG	5.3.2 Additional application information for the registration of a Production Device	Hydrogen could also be injected into transmission networks. We suggest specifying this in 5.3.2.	5.3.2 Additional application information for the registration of a Production Device In addition to the requirements set out in 4.4.1.3, the applicant shall provide in its application for registration of a Production Device for Hydrogen: a) on a simplified energy flow diagram, the location of any compression system, purification system, liquefaction system, Auxiliaries, Import and Export Meters, Storage facility,	agreed, thanks	amended as proposed: transmission network added

			consumption at the site of the Production Device, and indication of the points where the Energy Carrier becomes available for trade: gas packaging system, injection point into a Hydrogen distribution or transmission grid, injection point into a gas distribution or transmission grid.		
German Energy Agency (Deutsche Energie-Agentur, dena)	5.3.2 Additional application information for the registration of a Production Device, second paragraph a)	A plant description detailing the capacity and size of the plant's single components is better than an energy flow diagram. It is much easier for producers and plant owners to provide this compared to an energy flow diagram detailing all energy flows.	none	flow diagram enables to evaluate location of meter to be correctly positioned to determine amount of GOs correctly. Can be a simple schedule on 1 A4.	none

GRTgaz	5.3.20	We need indeed to distinguish hydrogen and gas GOs		Endorsement noted. Thanks.	none
ENTSOG	5.3.3 Qualification criteria for Production Devices	It is not clear how the quality criteria in brackets [ ] in point 5.3.3 are relevant for the GO issuing which should represent the environmental (climate) value: 5.3.3 Qualification criteria for Production Devices... Note: In addition to the purity requirement for Hydrogen, the GO Scheme may specify [the minimum pressure at which the Hydrogen must be brought at the Production Device boundary (e.g. 30 bar) for being treated as a Hydrogen Energy Carrier for which GOs may be issued.]	0	It is not only about GHG emissions, but rather about producing a usable product. Making society helpless in preventing large quantities of re H2 GOs being issued and put on the market (with extraordinarily little effort) for e.g. co-produced H2 burned in a furnace is not desirable. The proposed change allows stakeholders to choose to prevent tradability of GOs for a product that is only usable in the vicinity of the production device	none
German Energy Agency (Deutsche Energie-Agentur, dena)	5.3.4 Additional criteria for issuing GOs	In this case, the CEN Standard EN 16325 must provide a limit on GHG emissions for each energy carrier for the issuance of the respective GOs. The maximum	none	we didn't observe sufficient consensus to write such policy in the standard	none

		values must be set in the Standard in order to have a common reference across the European Union and avoid having different maximum values for each Member State. Including these maximum values in the Standard will facilitate the recognition and cross-border exchange of GOs.			
ENTSOG	5.3.4 Additional criteria for issuing GOs	We suggest that GHG intensity should not be considered as a criterion for GO issuing and thus should be deleted. This criterion should be considered as an optional attribute instead.	Delete the following note in 5.3.4 Additional criteria for issuing GOs: Note: for issuing GOs, the GO Scheme may specify criteria on the GHG intensity of the Output for which issuing of GOs is requested, as well as on the GHG intensity of Output for which no GOs were issued (for example:	criterion for issuance replaced by a disclosure requirement	text updated with a view to clarify

			requirement that the average emissions of all non certified Output in the preceding 12 months be below a benchmark).		
AGCS Gas Clearing and Settlement AG	5.3.4 Additional criteria for issuing GOs	Is it relevant to provide the information for output for which no GO was issued? This puts an extra administrational burden on the operator, registration and inspection process.	Keep only the first part of the sentence: "Note: for issuing GOs, the GO Scheme may specify criteria on the GHG intensity of the Output for which issuing of GOs is requested." Delete the second part of the sentence: "as well as on the GHG intensity of Output for which no GOs were	criterion for issuance replaced by a disclosure requirement	text updated with a view to clarify

			issued (for example: requirement that the average emissions of all non certified Output in the preceding 12 months be below a benchmark).”		
ENTSOG	5.3.5	Criterion in the note might be excessive for new production devices where respective information might not be available.	Add 'if available' in the note. 5.3.5 Data to be recorded on the GO ... Note: the GO Scheme may require additional information to be recorded (for example: the average emissions of all non certified Output in the preceding 12 months, [if available]).	agreed, thanks	amended as proposed
German Energy Agency	5.3.5 Data to be	We could not find any possible Inputs as Code in Annex A for hydrogen	None	elecricity is not an energy source but an energy carrier. The GO should record the original energy	none

(Deutsche Energie-Agentur, dena)	recorded on the GO, second paragraph .	produced out from electricity. How does the Code works for hydrogen? Are there only codes for the production device and not for the Input?		source of such electricity. Electricity is not the energy source but an energy carrier produced from another energy source. Conversion issuance rules state that the energy source is to be carried forward after conversion	
ENTSOG	5.3.6.1 Verification of an application for registration of a Production Device	It is questionable whether hydrogen purity should condition GO issuing as it does not reflect the climate value. Moreover, consequences of not satisfying 99,9 % purity level are not clear (i.e. should Hydrocarbon Gas GO be issued instead?).		follows the agreements within the hydrogen industry to serve consumers of pure hydrogen (who need their applications to be prevented from poisoning with impurities)	none
German Energy Agency (Deutsche Energie-Agentur, dena)	5.3.6.2 Verification of Consumption and Production Declarations	How is the Input verified and that it suits to the produced Output? For example, the proof that the electricity used for hydrogen production was exclusively from renewable sources.	none	follows from 4.11.3.2.d)	none
Gaz Réseau Distribution France (GRDF)	5.3.6.2, Verification of Consumption and Production	To limit the administrative and economic burden on renewable energy producer, it will be more appropriate that the Member States decides	Mentionned the "on annual basis" timing only as a proposal in the standard.	can be done more frequently if desirable, but a minimum level of fraud prevention is necessary. a lot of fraudulent reporting can take place, e.g. declaring unrenewable inputs as renewable	

	Declarations	the period in which the audit on the production device need to be updated in case of inputs from biological origin. Such flexibility will allow Member States to ensure consistency between GOs audit of the production device and other audits (for public support, RED II obligations for example). This will streamline the different audits to which renewable energy producer is subject.			
ENTSOG	5.3.7 Calculation of Nett Energy Production eligible for GO issuing	It seems that measurements should be already provided in MWh or kWh indicating the energy content, thus there might be no need to calculate the energy content. We suggest applying the same principle as in point 5.2.9.	5.3.7 Calculation of Nett Energy Production eligible for GO issuing In addition to the requirements in 4.5.4.2, for the purpose of calculation of Output as in 4.5.5, the energy content of Hydrogen shall be determined based on a flow	in order to provide the measurement values, they still must be determined, hence this is clarified how to determine them	none

			measurement (to be expressed in kWh/ MWh).		
Gaz Réseau Distribution France (GRDF)	5.3.7, Calculation of Nett Energy Production eligible for GO issuing	Use the same "unit" for hydrocarbon gas and hydrogen part of this standard.	Use upper calorific value.	is a difference between hydrogen sector and hydrocarbon gas sector	none
HAMBURG INSTITUT	5.4 Heating and Cooling	With regard to heating and cooling, GO schemes' institutional role has to be defined clearly: 1) primary role of disclosing information to end consumers 2) being a tool for regulations to enhance green energy 3) enabling or at least supporting the tradability of heating/cooling-GO 4) 1 and 2 in combination 5) 1 and 3 in combination 6) 1, 2 and 3 in combination If no such definition is made, we will not be able to decide on what standards fits best for what role. We expect		by REDII art19, the primary role of GOs is 1&3	none

		very different views on this question throughout member states and stakeholders.			
HAMBURG INSTITUT	5.4.1	5.4.1 Applicability: The note stating that "in case of cogeneration of electricity and heat, GOs can be issued for both" is a useful clarification and should be maintained. However, this should also only apply for heat that is injected into a grid that supplies at least another customer. With cogeneration in particular, it is important to ensure that cogenerated heat is not "wasted" and not only used for GO generation.		That is the intention of the text indeed. Please inform the CEN group on Heating and Cooling if you feel it needs more to establish this in the overall text.	none
Fingrid Oyj	5.4.2	Definitions of a production units are unclear, is this claasification e.g. temperatory/pressure possible and needed		there is a qualitative difference for heat consumers in low temperature versus high temperature heat, and low pressure versus high pressure steam. Same MWh of heat can	

				have different enthalpy value. Transparency on the GO facilitates consumer trust	
EnBW Energie Baden-Württemberg AG	5.4.2 b) 3)	How should a temperature range between 90°C (in summer) and 120°C (in winter) be classified?	Modify: Supply temperature range à maximum supply temperature	agreed	replaced by maximum supply temperature as suggested
EnBW Energie Baden-Württemberg AG	5.4.2 b) 3)	Many district heating networks have temperatures of max. 110°C (which is very low for district heating). According to the proposed classification, all these heating networks would be in the range (v) between >=110°C and <200°C. Therefore, a distinction between highly efficient district heating networks (temperature of max. 110°) and low efficient heating networks (temperatures of 140°C) is not possible.	Modify: Exchange >= with >, and < with <= è E.g. v) >110°C and <= 200°C	agreed that the maximum value should lead	symbols replaced as suggested
Fingrid Oyj	5.4.4	Definitions of a additional information are unclear, is this classification possible or needed at alll?		Difference in quality of heat can undermine consumer trust if not transparent on the GO. At least the temperature categories are to be maintained for this purpose, and for steam also pressure	ongoing through discussions in CEN H/C group

				information is relevant in this respect.	
EnBW Energie Baden-Württemberg AG	5.4.4 a) 3)	How should a temperature range between 90°C (in summer) and 120°C (in winter) be classified?	Modify: Supply temperature range à maximum supply temperature	agreed	replaced by maximum supply temperature as suggested
EnBW Energie Baden-Württemberg AG	5.4.4 a) 3)	Many district heating networks have temperatures of max. 110°C (which is very low for district heating). According to the proposed classification, all these heating networks would be in the range (v) between >=110°C and <200°C. Therefore, a distinction between highly efficient district heating networks (temperature of max. 110°) and low efficient heating networks (temperatures of 140°C) is not possible.	Modify: Exchange >= with >, and < with <= è E.g. v) >110°C and <= 200°C	agreed that the maximum value should lead	symbols replaced as suggested
HAMBURG INSTITUT	5.4.4a in combination with 5.4.6	Under what conditions there is a demand for GOs traded between non-interconnected networks is a question that merits further research. The FaStGO proposal outlined in 5.4.4a in combination with 5.4.6 differentiates GOs by physical properties of supply, following the Flemish case study as		It is left up to national GO schemes to determine geographical restrictions in accordance with their national needs. Further, there is a qualitative difference for heat consumers in low temperature	none

		outlined in the task 1.3 mapping study. However, while consumers may accept tradability across grids within a region, this might not necessarily be the case for non-regional trade. On the other hand, with the very detailed differentiation of heating and cooling GOs proposed in 5.4.4a (by medium type, predominant aggrega-tion state, seven categories of supply temperature range, three categories of supply pressure range), tradability may be overly restricted, when a member state opts to allow tradability across networks. The differentiation here would be much finer than is the case for electricity GOs. We are not convinced that the possible advantages of the differentiations regarding abuse prevention outweigh the disad-vantages regarding tradability and the interference on the potential of GOs as an instrument to decar-bonize DH systems. abuse. We therefore propose to reduce the number of physical properties which limit cancellation of GOs, to allow member states the flexibility to tailor the heating and cooling GO system to their infrastructural and regulatory contexts.		versus high temperature heat, and low pressure versus high pressure steam. Same MWh of heat can have different enthalpy value. Transparency on the GO facilitates consumer trust	
HAMBURG INSTITUT	5.4.4b	As one element supporting such transparency, we strongly support the FaStGO proposal of including the identity of the network through which heating or cooling is supplied as part of the obligatory additional information		thanks for the endorsement	none
German Energy	5.4.5 Additional	The name of the network operator (company)	b) the name of the network	The name of the network operator follows from the identification of	none

Agency (Deutsche Energie-Agentur, dena)	optional information on a GO for Heating or Cooling	should also be included in this section.	operator (company) responsible for the network named in a) through which the Heating or Cooling is supplied.	the network and would be a duplication of information on the electronic document	
HAMBURG INSTITUT	5.4.6	Also, we welcome the clarification under 5.4.6 that "provisions of a National GO Scheme may be such that to Disclose the Attributes of Heating or Cooling supplied through a network, only GOs for Heating or Cooling may be Cancelled bearing the identity of that network in accordance with 5.4.4b) above". Within a network, GOs could potentially make an important contribution towards integrating RES: for example, if district heating grid operators can define credible green heating products and market them to specific target groups with a higher willingness to pay for such products. Particularly if a differentia-tion of primary energy factors (PEF) between products would be possible, this could provide important incentives for decarbonising heating grids. The current practise "one PEF for one grid" needs to be re-placed by "one grid – different products based on GO with corresponding PEFs".		not really clear what amendment is proposed	
HAMBURG INSTITUT	5.4.6	Also, to comply with 5.4.6, additional data would be needed when an account holder requests a cancel-lation of GOs (according to		ok to add something, but leaving the liberty to the domain GO scheme to determine the details	sentence added in 5.4.6: The cancellation

		4.9.2.1.2). Potentially, clarification would be helpful what information would need to be provided by account holders when cancelling heating and cooling GOs and how this would be monitored.		procedures of the Domain GO Scheme shall comprise the relevant controls to ensure such.
HAMBURG INSTITUT	5.4.8	We support the definition of Calculation of Nett Energy Production eligible for GO issuing according	thanks for the endorsement	none
HAMBURG INSTITUT	5.4.8	Potentially, other means of differentiating between heating and cooling GOs may exist. For example, given that the output relevant for GO issuance is based on the difference between the energy content at the exit and entry of the production device (5.4.8), a differentiation of GOs by temperature added or deducted might be possible. A clarification may be useful, to what degrees national GO schemes may adopt additional information requirements or cancellation limits, to experiment with different ap-proaches beyond the standard's minimum requirements.	that is the case anyway: member states can add more info on the GO. Just they'll have to make agreements with other issuing bodies if they want this information to be maintained after cross border transfers.	none

HAMBURG INSTITUT	5.4.9	According to 5.4.9, „tradeable GOs for Heating or Cooling are only issued for Heating or Cooling which is injected into a network that supplies one or more customer(s) which is another entity than the producer and which is physically connected to the network the Heating or Cooling is delivered to". When discussing the problem of double disclosure in relation to onsite consumption and non-interconnected grids, the task 1.3 mapping study recommends that the scope for issuance and disclo-sure of GOs must be the same and correspond to the overall amount of regulated supply for which there is regulatory supervision of disclosure (challenge 13). The proposed solution for avoiding a double counting of attributes is to limit the reception of tradable GOs to consumption of produced energy that is part of the domain's national consumption statistics, used for the residual mix calculation. The mapping study names the example of onsite electricity consumption, where green attributes could be double counted, if such onsite consumption was not included in national consumption statistics.	not really clear what amendment is proposed	consider adding in 5.4.9: c) the Domain GO Scheme provides that the quantity of both production and consumption in that grid are taken into account in the residual mix calculations, and that consumption on that grid is subject to a legal Disclosure requirement backed with either: iii. cancelling GOs for consumption of electricity with specific Attributes, or iv. Residual mix.
HAMBURG INSTITUT	5.4.9	Also, as outlined in the FaStGO mapping study, heating and cooling GOs may be subject to a greater risk of fraud than electricity or gas GOs. Especially if there are price spikes in RES GOs, it needs to be en-sured that heat is still supplied to meet an	This most relevant comment was considered in FaStGO and deliberately not made explicit in the text. The reason is found in experiences from issuing bodies with heat GOs and cogeneration GOs. Monitorring such criterion can be costly, and often there are still legal ways to omit actual viable ecological use of the	

		economically useful demand, and not primarily to meet GO demand. In this context, the seasonal character of heating and cooling demand is also relevant. Solar thermal plants, for example, could produce more energy in the summer than required for supplying heating grids. GO schemes need to reliably prevent producers from generating heat for which there is no demand, with the purpose of selling GOs. Limiting tradeable GOs to heating or cooling injected into a network that supplies at least one customer which is another entity than the producer, as proposed in 5.4.9, is a useful safeguard in this context. When implementing GO schemes, a close monitoring is nec-essary whether this safeguard proves effective in preventing the outlined problem. In this context, further research is needed on the above mentioned question, if Heating GOs shall only be issued when it is proven that the heat has not only been produced but also consumed for an economically viable purpose as such.		heat. However the very fact that the heat must be supplied to a consumer of the heat is a trigger for efficient use of the heat, as the economic supply transaction will motivate both parties for efficiency.	
EnBW Energie Baden-Württemberg AG	5.4.9	Tradeable GOs for Heating or Cooling are only issued for Heating or Cooling which is injected into a network that supplies one or more customer(s) which is another entity than the producer and which is physically connected to	It should be made clear that the trading of GO should be considered independently. Trade of GOs beyond the physical boundaries of a	trade beyond boundaries of network is possible. Just the heat must be disposed to one or more other parties. Tradeabel GOs are not issued for heat produced in a domestic wood pellet stove	none

		the network the Heating or Cooling is delivered to.	heating network should be possible.		

HAMBURG INSTITUT	5.4.9 and 5.1.8	Potentially, a clarification is needed for the perimeter of heating and cooling GOs, that national GO schemes must ensure that tradeable GOs are only received by consumption of produced energy that is part of the domain's national consumption statistics. In the case of electricity GOs, such a requirement is made explicit in section 5.1.8 No. 2: when output is injected into a closed distribution system, nation-al GO schemes have to provide that the quantity of both production and consumption in that grid are taken into account in the residual mix calculations, and that consumption on that grid is subject to a legal disclosure requirement. For heating and cooling, national GO systems need to be developed in close alignment with national energy statistic providers, to ensure that		agreed	consider adding in 5.4.9: c) the Domain GO Scheme provides that the quantity of both production and consumption in that grid are taken into account in the residual mix calculations, and that consumption on that grid is subject to a legal Disclosure requirement backed with either: iii. cancelling GOs for consumption of electricity with specific Attributes, or iv. Residual mix.

		robust data is available in a timely manner for residual mix calculation. The issue of double counting is particularly relevant when heating and cooling GOs are traded across non-interlinked networks. For example, if consumers are connected to a heating grid supplied by a bio-mass plant, they may easily fail to acknowledge that the "green" heating characteristic of this plant has been transferred to a different heating grid. The question of how the residual mix supplied to them is calculated and communicated is likely to have a high impact on the credibility of the scheme. However, no research is available on how this could work.			
AGCS Gas Clearing	Additional optional	The sentence is not complete.	In addition to the Attribute	the current 5.2.6 is a grammatically correct whole	1

and Settlement AG	information on a GO for Hydrocarbon Gas		recorded as the Source Type for which the corresponding GO was issued, information on those Inputs, Source Type, and their share in total energy Input shall be provided or recorded on the GO.		
Fingrid Oyj	Annex	Add the Annex D Geographical coordinates from the current standard: this is needed to allow transfers between the Members States		This is a necessary list that identifies the system used in a country for setting the geographical coordinates. This list is however subject to changes and incomplete today because it only contains the coordinates from the current 27 EECS Issuing Bodies. It is proposed that this list is maintained by the issuing bodies in a framework for joint cooperation	none
EnBW Energie Baden-Württemberg AG	Annex A	Annex A: Sewage sludge should be included as a fuel; Sewage sludge as solid biomass for (mono-) combustion	Table A1: Level 1: renewable Level 2: solid Level 3: sludges Level 4: „0 unspecified" and „1 sewage sludge".	Agreed, thanks. Was already inlcuded in our proposal of 25/5.	None

Green Gas Certification Scheme	Annex A Table A.1 — Energy Source codes	We have ten years of experience issuing Biomethane Certificates for consumer disclosure and dealing with biomass information and I do not believe the proposed taxonomy suits the market. I don't see anywhere a clear explanation of what the different "levels" in the codes are (maybe I missed it?). Considering GoO for biomethane should I use the codes for solid or liquid inputs (Level 2 Code 1 or 2) into the digestion process? Or refer to the codes for gaseous input into the gas upgrading. (Level 2 Code 3)? If I use the gaseous input codes then I have a lot of options for the type of manure used but not much else. What is needed is to be able to make it clear that the GoO is for:	Level 3 is a list of classifications - product, co-product, agricultural residue, processing residue, waste. Level 4 is a list of substrate names or names of distinct groups of substrates, Our initial suggestions would be; Products - Mazie - Wheat/Barley - Sugar Beet - Grass - Mixed Energy Cops Ag. Residues - Straw - Outgrade/Unsalable Vegetable	Thanks for the input. 1) this is done through separate data fields 'type of energy carrier' and 'type of gas' 2) is done through a separate data fiedl 'technology type' 3) and 4)The categorisation in Annex A aims to facilitate all energy carriers. In case of biomethane from biodigestion, it is the idea to work with the original feedstock, being either a solid or liquid one. However in electricity today there is still use for the gaseous - categories, which are now proposed to be phased out. 5) adding the categories you propose, makes it for the issuing body quite a hassle to issue GOs per individual feedstock. with the current categorisation, slightly more high level, it is possible for the issuing body to mention on the GO a generic category, without splitting out per batch how many GOs were issued for mais and how many for sugar cane. the info could however be added on a voluntary additional data field by the issuing body.	Clarified in introduction of Annex A: "The energy Source Type code on a GO establishes the energy source from which Output, for which the GO is issued, was generated. This refers to the original energy source with which energy is produced, not to intermediate energy carriers."

		1) methane (or another type of gas) 2) produced via anaerobic digestion (or another type of process) Then… 3) (if information is available) what the individual substrates used– e.g. maize, whey permeate, domestic food waste, or small groupings e.g. mix of agricultural crops 4) if the information is available) classification of that substrate or a small group of substrates - as either a product, residue or waste (ag. residues vs processing residues could a further sub division as could product and co-product) - so up to 5 classifications. Level 3 and 4 are currently mix of substrate names, classifications, groups of substrates and	- Crop Screenings Processing Residues - Dairy Processing Residues - Brewing and Distilling Residues - Meat Processing Residues - Vegetable Peelings - Aquaculture and Fishery Residues Wastes - Domestic food waste collection - Industrial/Commercial Food waste - Sewage Sludge - Animal Manures		

		vague labels like “bio-waste”. Instead one level should contain substrate names, or small distinct groups of them. The other level should be their classification as a waste, residue, product etc.			

ENTSOG	Annex A Table A1	The draft proposed to replace the energy source type code for Sewage, Agricultural, Process gas and gas from organic waste digestion with the corresponding coding under Renewable-solid. We support this proposal and suggest updating Table A1 accordingly (to avoid confusion).	Update Table A1 in Annex A.	As the current gaseous codes with (*) are still in use in electricity, it is proposed to facilitate a transition period for them to be phased out.	explicitly add end date of codes with *, below the table of annex A
Gaz Réseau Distribution France (GRDF)	Annex A, code F01010506, "Energy crops (unspecified)	Not necessary to have energy crops and food and feed crops category in this Annex as according of RED II's definition, energy crops is food and feed crops + Better to use RED II definition so food and feed crops.	Delete this category.	Thanks for the suggestion. For further discussion. 2 questions: 1) Does that also include Yatropha oil, which is poisoneous for eating? 2) there is a precondition inside the REDII definition of food and feed crops, there can be energy crops outside that precondition	for discussion
Gaz Réseau Distribution France (GRDF)	Annex A, code F01010508, "Cover Energy crops"	The mix of the term "energy" and "crops" will lead to think about energy crops. However, cover crops/intermediate crops are not energy crops according to RED II.	Rename this category by "cover crops or intermediate crops".	thanks, adopted	replaced as suggested
Gaz Réseau Distribution France (GRDF)	Annex A, code F0102070	Need to harmonize the term used in all the Source Type Annex.	Call it "sewage sludge".	The definitions on top of annex A clarify what slurry means	none

	0, "Sewage"				
Gaz Réseau Distribution France (GRDF)	Annex A, code F01030501, "Process gas"	Syngas/methane and hydrogen exist for fossil part of this Annex but not for the renewable part of this Annex rather than this standard is also dedicated to hydrogen and all hydrocarbon gas (included of non biological origin such as syngas/methane). Moreover, Annex B on Technology Codes mention the methanation/Hydrogen process.	Include a process gas part in renewable gas category, with two sub-category: syngas/methane and hydrogen.	If the origin of the process gas is renewable, the source code should go further back to the type of renewable origin	none
Gaz Réseau Distribution France (GRDF)	Annex A, code F01100100, "Sewage slude"	Sewage sludge is already mentionned in an isolated category in level 4, point 2. No need to make a repetition.	Delete the mention of "sewage sludge" in this category.	ok to delete	code deleted
Gaz Réseau Distribution France (GRDF)	Annex A, Energy Source Type codes	The definition of "non-food cellulosic material" is the only one in RED II which refers to intermediate crops that can be used to producer renewable gas but mainly whihc is mentionned in the list of Source Type in Annex A.	Include article 2§42 on the definition of "non-food cellulosic material".	as the word is not used in the table, such definition doesn't yet add value	-

Gaz Réseau Distribution France (GRDF)	Annex A, Energy Source Type codes, third sentence	Not in line with specificities mentionned in hydrocarbon gas part for renewable gas to mention that each GO refers only to one Source Type.	Delete this sentence as already mentionned as an option in the previous paragraphs of the standard and explained in each Energy carriers.	This is an essential design criterion of an efficient transfer system: a GO buyer can select x GOs of source type y. also for publishing statistics of and across member states, this is much more market facilitating. An optional data field is added to the GO that allows for mentioning in addition the mixture of the inputs	non
GRTgaz	Annex B	replace hydrocarbon gas by gas		this choice was made to exclude the predefined product of pure hydrogen of 99,9% purity, which circulates as a separate product, identifiable as such on the GO. Hydrocarbon gas is a term used in chemistry: https://www.britannica.com/science/hydrocarbon.	none
KU Leuven	Annex B Table B.2	A category for synthetic methane with CO2 of renewable origin is lacking	Add a technology category M0302XX: "Methanation with CO2 from renewable origin"	Origin of CO2 was removed again since the technology code is designed to relate to the technology only, not to the origin of what is consumed by the technology. The renewable origin of the CO2 is better to be incorporated through the GHG information on the GO	None

ENTSOG	Annex B Table B.3	Production of Hydrocarbon Gas with CO2 from renewable origin cannot be considered as a separate subcategory of production technology. Moreover, the origin of the CO2 will only create a wrong impression as if the GO certifies renewable gas. However, this will not be true as the origin of gas does not depend on the origin of CO2 according to RED II which defines 'renewable energy' as energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas. Therefore, the origin of CO2 should not matter for the customer.	03 Chemical synthesis Production of Hydrocarbon Gas	adopted as proposed	adopted as proposed

		Thus, we suggest deleting 'with CO2 from renewable origin'.			
KU Leuven	Annex B Table B.4	A category for direct solar to hydrogen conversion is lacking. Without this category, an additional barrier to innovation is introduced for such upcoming technologies.	Add category "Solar hydrogen production" Subcategories could include "Solar thermal"; "Solar-electrochemical"; "Photobiological"	Thanks. We keep the energy source 'Solar' in itself in Annex A. So the category 'solar hydrogen production' doesn't add much. Solar comes from the data field Source Type (from Annex A), Hydrogen production from the data field Energy Carrier on the GO. o Solar thermal: do you have a more specific name for the technology? How does the heat used produce hydrogen? o Electrochemical: is that just electrolysis? (that category is	additional category Photobiological included in B4

				already there) o I indeed understand Photobiological as a category that is not yet listed on the B4.	
KU Leuven	Annex B Table B.4	Steam methane reforming with CCS and with CCU should have two distinct categories to improve transparency. CCU can be used to produce hydrocarbon fuels, which have a short consumption cycle and rapidly cause the CO2 to be emitted into the air.	Add two categories: "H0302XX - With CCS" "H0303XX - With CCU"	Thanks.	included in B4
ENTSOG	Annex B Table B.4	Table B.4 'Technology codes for production of Hydrogen' could be complemented with pyrolysis.	Include technology code for pyrolysis.	Can pyrolysis achieve the required purity level of99,9% H2?	
ENTSOG	Annex B Tables B2 and B3	According to the current draft of the Standard Hydrocarbon Gas GOs shall also be issued for hydrogen injected into		We see the need for a clarification in the text.	sentende added in the introduction of the table B2 to indicate that for

		natural gas network. Therefore, it is reasonable to supplement tables B2 and B3 with the codes for hydrogen production technologies. As an alternative, section 5.2. may indicate that the technology codes for hydrogen production in Table B4 should apply. Moreover, if our proposal on removing attribute of 'network compatible gas' is accepted, Tables B2 and B3 should be merged.			hydrogen injected into the natural gas grid, the codes of B4 apply.
Gaz Réseau Distribution France (GRDF)	Annex B, Table B.3, code 0301, "Production of Hydrocarbon Gas with CO2 from renewable origin"	Harmonization of the term used in Network compatible gas part and other hydrocarbon gases as it is produced in the same way. Methanation is the legal term used in scientific literature, by European institution and also national actors.	Change the term "Production of Hydrocarbon Gas with CO2 from renewable origin" by "Methanation".	Since this table contains the technologies which produce 'other gases', the term methanation is too narrow.	none

EnBW Energie Baden-Württemberg AG	Annex B.2	Missing in B2: methanisation (H2+CO2) further specification required!	Proposal: Level 1: 03 - methanisation Level 2: 00 - unspecified 01 – catalytic methanisation 02 - biological methanisation Level 3: (for all 3 at Level 2) 00- unspecified 01. H2 from RES + non fossil CO2 02. H2 from RES + fossil CO2 03. H2 from non-RES + non-fossil CO2 04. H2 from non-RES + fossil CO2	Origin of H2 is to be proven with GOs and comes already on the GO from Annex A in relation with the Conversion Issuance process, best to make Annex B independent of Annex A. Origin of CO2 was removed again since the technology code is designed to relate to the technology only, not to the origin of what is consumed by the technology. The renewable origin of the CO2 is better to be incorporated through the GHG information on the GO	none
EnBW Energie Baden-Württemberg AG	Annex B.2 and B.3	The two Annexes should be combined into one Annex.		That is the intention indeed: they are one annex, but two tables, as the technologies and the output product is significantly different.	none

EnBW Energie Baden-Württemberg AG	Annex B.4	Steam Methane Reforming (Code 3) should include Natural gas, biomethan (from gas grid) and biogas (without being injected to the gas grid)	Level 1: 03 Steam Methane Reforming Level 2: 00 unspecified 01 natural gas without CCS/CCU 02 natural gas with CCS/CCU 03 biogas without CCS/CCU 04 biogas with CCS/CCU 05 biomethane without CCS/CCU 06 biomethane with CCS/CCU	the origin of the gas already comes on the GO through theAnnex A codes on the GOs cancelled for conversion issuance . Concern met though keeping technology and source as separate data fields on the same GO	none
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	Annex D	The standard should be neutral with regard to mentioning AiB(or other private companies and their products). Rationale: • EN 16325 is a technical standard and should be kept neutral with regard to private companies. A standard is a means to allow such com-petition.	Remove all remaining mentioning of AiB (or other private organ-isations/products) in the document. Focus should be on a general standard, already existing stand-ards	Deleted	Section with AIB, ERGaR and Hinicio deleted

		• The member states' authorities decide which hub to use, not CEN.	should be integrated in the long run.		
EnBW Energie Baden-Württemberg AG	Annex E 2.2	We support a batch consideration according to the different input materials. However, the illustration of the calculation formula under E1.2 is confusing, as it is not applied to E2.2. The subject is also discussed in the explanatory notes under 2.13. Here, for our purposes, the optionality of a mix card should not be allowed.	Introduction of an additional figure for the calculation basis under E2.2.	Add chart showing application of E2.2 (shown at the workshop)	chart added to annex E2.2
ENTSOG	Annex E 4 Determining the Carbon footprint of Inputs related to	It is not certain that according to ISO 14067 wind, solar and hydroelectric production will not have any life-cycle emissions. Therefore, we suggest	The following should be deleted: Unless indicated otherwise in the GOs cancelled to	Add note that footprint of PV and Wind is zero considering the calculation perimeter defined in this annex	note added to Annex E4

	Energy Carrier Conversion	deleting respective clause with a view to avoid unjustified preferential treatment for respective types of technologies.	make a claim on the origin of the Input, the carbon footprint of an Energy Carrier is considered to be equal to zero if its Source is wind, solar, or hydroelectric.		
Gaz Réseau Distribution France (GRDF)	Annex E, paragraph E.1.1, Which emissions to take into account and reference for the methodology	The ISO 14067 standard is not in line with the methodology mentioned in RED II to calculate the GHG emission of a renewable energy production. The emissions taken into account are different from ISO 14067 and RED II regarding methane emissions of grid/infrastructures, carbon storage of biomass or compression emissions for transport use for example. However, from June 2021, all energy producer will have to prove that their production respect the GHG emission values mentionned in RED II by	Use only RED II methodology for calculating the carbon footprint of renewable energy to mention on the GOs.	There will be different GHG emissions values depending on the purpose, this is already the case today (direct only, direct + up stream, emission savings…)	in 4.5.1.2. it is added that a reference to the methodology for Carbon footprint calculation must be mentioned on the GO

		applying the methodology of this Directive so to prove that it is renewable. As this methodology and ISO 14067 are not in line, that will create administrative and economic burden to the renewable energy producer that will have to calculate two GHG emissions value. It will also lead to two (or more) GHG emissions value for each renewable energy production regarding the document use (ISO 14067 for GOs and RED II for sustainability certificate) ; which would lead to confusion for the consumer in terms of information on renewable energies.			
Gaz Réseau Distribution France (GRDF)	Annex E, paragraph E.1.5, Verification of the data required for	To limit the administrative and economic burden on renewable energy producer, it will be more appropriate that the Member States decides the period in which the	Delete the "annual basis" timing or at least mentionned it only as a proposal in the standard.	As this is a GO data field, the same auditing rules as those that apply to the other GO data fields are applied	none

	calculating the carbon footprint	audit on the carbon footprint need to be updated. Such flexibility will allow Member States to ensure consistency between GOs audit of this data and other audits (for public support, RED II obligations, production device for example). This will streamline the different audits to which the renewable energy producer is subject.			
Gaz Réseau Distribution France (GRDF)	Annex E, paragraph E.2.2, Output produced from multiple Inputs where the production process could equally function with only one of the Inputs.	RED II propose to calculate an average carbon footprint in case of mix of Inputs and mentionned in point E.2.1 of this Annex. As biomethane GOs will only mention a mix of source type in case of production of Output from different Inputs, it is appropriate that the carbon footprint mentionned on the GOs also take into consideration the mix of carbon footprints of each Inputs.	Add a sentence mentionning that "to obtain the total carbon footprint of the Output, carbon footprint of each Inputs need to be added regarding the volume of the Input used to produced the total Output".	Mentioning a mix of source types for biomethane needs to be covered in the Hc Gas section. Then, using the GHG intensity for that mix can be specified in Annex E. It could complexify the GHG allocation process while in this case the overhead can be avoided	in 4.5.1.2. it is added that a reference to the methodology for Carbon footprint calculation must be mentioned on the GO

Gaz Réseau Distribution France (GRDF)	Annex E, paragraph E.4, Determining the Carbon footprint of Inputs related to Energy Carriers Conversion	European rules (EU ETS for example) mentions for now that without contradictory information (such as carbon footprint mention on the GOs), the carbon footprint of biomass is equal to 0; not only renewable electricity sources. Moreover, the last paragraph of this section talk about biomass. Better to use the same term.	Change mention of "wind, solar and hydroelectric" by "biomass".	ETS only covers direct emissions, whereas the footprint also includes upstream emissions Comment regarding the term "biomass" not understood	in 4.5.1.2. it is added that a reference to the methodology for Carbon footprint calculation must be mentioned on the GO
ENTSOG	Annex E.1.6 Argumentation for the proposed methodology	It is not certain that hydrogen will / should be considered as a biomass fuel and thus be subject to sustainability criteria in the national law of MS. We suggest deleting biohydrogen from the list of examples.	The word 'biohydrohen' should be deleted in the following fragment: Quantification of Carbon footprint is an established practice for energy products such as biofuels, bioliquids, and biomass fuels (which include biomethane [and biohydrogen]), as well as fuels of non-biological origin, in order	the possibility follows from energy conversion and conversion issuance	none

			to demonstrate compliance with the applicable sustainability criteria.		
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	E.1.2 and E 2.2, General calcula-tion formula	The picture of the formular is not coherent with the explanation in E. 1.2 and E 2.2.	Please modify the picture or even better insert additional pictures for all explanations in E.2.2.	Add chart showing application of E2.2 (shown at the workshop)	chart added to annex E2.2