



Regulatory good practices

Certification discrepancies-

There should be none as the standard is built on information provided by Directive

Joni Vuorela

Green Trading Desk Manager

Fortum

Join the
change

 **fortum**

Good regulation principles identified by EU and OECD.

"Do not use a sledgehammer to crack a nut"

Decision making is open and transparent

Stakeholders can contribute via process of consultation

Before taking action the relevant impact is taken into account

Regulatory burden on business, citizens or public administrations are kept to a minimum

Following topics are important to notice from Flanders- Sweden dispute. We would welcome more transparency from AIB

There was no changes in Swedish Domain Procol or Legislation which could have triggered the ban. The annual AIB audit was approved in General meeting and no other domains have imposed restrictions.

Next phase is to have European Commission to make ruling based on notification.

This topic could be solved between regulators and internally in AIB, as it has originated there

Our view is that the ban is based on opposing views about grid definitions, which is not defined at all in Directive or in current EECS rules. This work should be done in relation to disclosure rules

Proposed solutions are currently at stalemate, and this imposes additional regulatory risk on GoO market. Current actions have not strenghtened the overall market

Swedish regulator is issuing GoOs only for market settled electricity

Way forward regarding CEN-EN 16325 standard. The focus should be but on CEN standard itself, not the current EECS rules.

As the market is growing and expanding the risks are also growing. Regulation and governance needs to improve to safeguard the market set-up to create trustworthy investment environment for renewables

Guarantees of Origin are a critical tool on current PPA market to enable any trustworthy claims about origin of electricity. This is exceptionally important for cross border PPA set-ups

Full disclosure vs. issuance rules.
A guarantee of Origin can be transferred independently of the energy which it relates

System wide approach should be kept technology neutral

There is no reason to add complex layers on standards. Trust should be built on harmonized regulatory framework and minimum information based on Directive