

Directive 2009/28

Consequences regarding EECS



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RES Directive/EECS standard

Directive / EECS standard: almost a perfect fit

- Clear definition of GO, link with EU directive 2003/54.
- *“No more than 1 GO shall be issued in respect of each unit of energy produced.”*
- *“A GO shall be cancelled once it has been used.”*
- *“The designated bodies shall (...) be independent of production, trade and supply activities.”*
- Specifications of GO, article 15 sub 6 are almost all to be found in EECS.

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Article 15 paragraph 2

“A guarantee of origin shall be of the standard size of 1 MWh.”

- Certificate splitting in PRO
- Although most members already issue only EECS-certificates with a face-value of 1 MWh, this is not the case in all countries
- It is proposed to change the EECS system as to ensure a face value of 1 MWh for all certificates under all schemes.

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Article 15 paragraph 3

“Any use of a guarantee of origin shall take place within 12 months of production of the corresponding energy unit.”

- In the view of AIB it is most efficient to introduce an expiry date to ensure the restriction above.
- The expiry date could differ for the different EECS-schemes.
- After the expiry date the cancellation or transfer of a certificate is no longer possible.

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Article 15 paragraph 3 (continued)

- What about production devices which may not be able to receive EECS-certificates within twelve months of production?
- Considerations concerning the validity of EECS-GO issued under 2001/77; transitional measures
 - Will old GOs remain valid after 2010? Should requirement of 12 months also apply to old certificates?
 - What if MS implement the Directive before the end of 2010?
 - How to keep old GOs separate to new ones?



Article 15 paragraph 6

This article mentions a number of obligatory information items that have not been implemented (to the full extent, as the Directive requires) in the EECS-GO scheme.



Article 15 paragraph 6 (continued)

Among others:

- Energy source
- Type of installation
- Location of the installation where the energy was produced

But most notably: information on support



Article 15 paragraph 6 (continued)

- *“Whether and to what extent the installation has benefited from investment support”*
- *“Whether and to what extent the unit of energy has benefited in any other way from a national support scheme, and the type of support scheme”*



Article 15 paragraph 6

(continued)

- Earmark on support: this has been discussed before
- The phrasing 'to what extent' specifically could be difficult to determine, and might be implemented in many different ways:
 - How to relate investment support to 1 MWh?
 - What about (very) old plants, is the information available?
 - How to check support information?
 - What is the value of that information?
- These issues must be resolved in the near future.



Thank you for your attention

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