

SHAPING AN EFFECTIVE RENEWABLE ELECTRICITY MARKET

Open Markets Committee Input RECS International

Date: Split, September 25, 2014



Agenda – Open Markets Committee

- 1. Opening
- 2. AIB's new Mission Statement and strategy
- 3. Expansion of EECS new members / prospects
- 4. Overview of recent / upcoming work of RE-DISS II
- **5.** RECS International topics / opinions
 - a. Ex-domain Cancellations and improved statistics
 - i. Result of RECS International letter
 - b. EU Countries without well-functioning disclosure
 - c. Know your customer
 - d. Non-EU countries
 - Pick-up, future of I-REC and work with AIB
 - ii. Specific discussion of I-REC and the AIB
- 6. Any other business



- 1. RECS International topics / opinions
 - 1. Ex-domain Cancellations and improved statistics
 - Result of RECS International letter
- RECS gave letter to AIB on July 22, 2014
 - RECS International believes that statistics about ex-domain cancelations are no different than other cancelation statistics
 - RECS feels that limiting this information is hurting market integrity
- Additional points on statistics
 - AIB statistics can be misleading for an outsider: Swedish GO versus EECS and non-EECS more generally
 - Distinguishing nuclear, fossil and renewable is of the highest priority
- Response AIB



- 1. RECS International topics / opinions
 - a. EU Countries without well-functioning disclosure
- RECS International accepts the opinion of the AIB Board
 - Disclosure is of a high importance and must be well regulated
 - Allowing countries to join EECS with restrictions is fine
 - Restrictions should be well defined in time
 - Consequences for not adhering to timelines must be clear
 - Effect on the market should analyzed in all cases
- RECS-I feels that proper disclosure policies are a common goal; Cooperation between the organizations is beneficial



- 1. RECS International topics / opinions
 - a. Know your customer
- Concern among members regarding the new forms
 - RECS International requests that information, like KYC forms, be first discussed with RECS
 - RECS can then discuss this and prepare their members
 - 'Blindsiding' clients with additional documents without a clear reasoning, future direction or consequence for non-compliance is illogical

We request that the AIB enter a dialogue with RECS International before their members send out KYC forms. KYC forms that have been sent in the last 6-months should also be discussed with RECS.

 New contracts for use of registries should be discussed with current account holders and/or RECS International before implementation



- 1. RECS International topics / opinions
 - a. Non-EU countries
 - Pick-up, future of I-REC and work with AIB

I-REC Standard is <u>first a foremost a Standard!</u>

Secondly I-REC Standard is a <u>voluntary initiative</u>, based upon third-party criteria (GHGP, CDP) to <u>promote tracking systems</u> where no reliable tracking system exists!

- A standard approach to tracking systems (laid out by EECS and US-RECs) is needed to guarantee high-quality and reliable tracking systems
- Import and export is <u>not</u> a goal itself, user friendly registries and client oriented systems are the priority
- Disclosure is of the highest priority, working together with CDP and GHGP guidance, I-REC will create annual residual mix calculations for areas where issuance is active
- No country will have I-REC Standard issued certificates without local government knowledge of its existence



- a. Treatment of countries outside of AIB Membership
 - Specific discussion of I-REC and the AIB
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- Phase out of RECS-certificate in Spain was an issue
 - Market for renewables in Spain was collapsing
 - The existing GO system in Spain does not facilitate trade
 - I-REC provided a voluntary system (like EECS) to work in conjunction with (and not against, like RECS) the local Spanish-GO system
 - RECS International sees I-REC as the same as AIB, a standardized system for renewables
 - I-REC mentioned in their letter that they would work with EECS to get EECS implemented in Spain
 - EECS remains the priority of RECS, we see I-REC Standard as a partner of the AIB in Spain convincing the Spanish government that GO standards are needed

RECS International hopes the AIB and I-REC Standard will team up to meet with local Spanish government officials and get <u>EECS</u> implemented! <u>RECS-I members prefer EECS and will help!</u>