

## CEER Public Consultation on 2013 Work Programme

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### Response from: RE-DISS project

Dear Ms. McCoy,

as the coordinator of the “Reliable Disclosure Systems for Europe” (RE-DISS) project, which is supported through the Intelligent Energy Europe programme, I would like to thank you for the opportunity to react on the CEER 2013 Work Programme.

The RE-DISS project aims at improving significantly the reliability and accuracy of the information given to consumers of electricity in Europe regarding the origin of the electricity they are consuming. Such information is given to all consumers through the regime of electricity source disclosure, which is a requirement on all European suppliers of electricity based on Art. 3(9) of the Internal Energy Market Directive 2009/72/EC.

Guarantees of Origin for electricity from renewable sources (RES) constitute an essential feature of reliable disclosure systems and the rapidly growing market for green energy. The RE-DISS project aims at supporting European countries to properly implement the requirements set out in the RES Directive 2009/28/EC as well as in the Cogeneration Directive 2004/8/EC and the Internal Energy Market Directive. The project establishes and supports a group of Competent Bodies which have been designated by major European countries and which are dedicated to improve the procedures for Guarantees of Origin and electricity disclosure in their countries.

The RE-DISS project was launched mid April 2010 and terminates in October 2012. A follow-up project has been proposed to the Commission. The project builds upon the results and recommendations from the E-TRACK project ([www.e-track-project.org](http://www.e-track-project.org)), which has developed a standard for systems tracking electricity attributes in Europe for the purpose of disclosure. For more information on the RE-DISS project please see the project website [www.reliable-disclosure.org](http://www.reliable-disclosure.org).

The RE-DISS team has already had the opportunity to present RE-DISS to the TF Sustainable Development of the CEER Electricity Working Group on 13 April 2011. Furthermore, we have organised a series of workshops to which we invited the competent bodies of the member states, many of whom are NRA's. Two of our project partners are regulatory agencies (E-Control and VREG).

We are quite happy that CEER is making a clear statement that the customer focus is essential for the energy regulators. Disclosure is by definition a customer-oriented theme, and in our opinion a topic which could be furthered by a CEER initiative in this field. Our experience is that a lack of harmonisation and regulatory control is leading to errors in the disclosure methodologies, undermining the noble goal of fostering competition by the provision of correct information towards customers.

Recent results of the RE-DISS project indicate that up to 100 TWh of RES electricity might have been double-counted in the year 2010 because of inconsistent and non-harmonised disclosure regulations in Europe. This means a significant error in the disclosure information given to consumers, which can be seen as “green washing” of fossil and nuclear energy, and it might undermine the credibility of green power products across Europe. RE-DISS has developed a set of ready-to-use “best practice recommendations” for competent bodies, which can reduce this error to a minimum. Considerable progress in reducing this error has been made in many countries during the period of the RE-DISS project so far, but there is much work left to be done.

We do understand that CEER has to make choices on priorities when it comes to defining a work programme, but we are convinced that it would make sense to further raise and discuss the disclosure issue within the CEER Customer Working Group.

Within the framework of the EC-led working groups on green washing, it is sensible to believe that energy will be in the picture. Therefore, the development of a vision on reliable disclosure systems to be shared amongst the European energy regulators is an important step which could lead to a common approach.

The RE-DISS team is willing to present its activities and its proposals to include disclosure in the CEER 2013 Work Programme to you at any time while preparing the final version of the document.

With best regards

Christof Timpe  
RE-DISS project coordinator