

CEER Public Consultation on 2013 Work Programme

Response from: RECS International

To whom it concerns,

We thank you for the opportunity to comment the CEER 2013 Work Program.

RECS International recommends an additional paper in CEER 2013 Work Program for the sector *Costumers*, about **Tracking Electricity** (proper implementation of GO-systems and the use of the GO) and **Disclosure** (informing consumers about electricity sources, carbon emissions and nuclear waste).

We have the following rationale behind this recommendation to CEER:

- Consumers are free to chose their supplier, but we see more and more that consumers also choose for specific electricity products, in particular electricity from renewable sources.
- We all know that electricity cannot be tracked through the electricity grid and for that reason the Guarantee of Origin (GO) for tracking electricity is introduced in order to proof at least that the production of electricity is uniquely certified and consumption of that electricity is also uniquely certified by cancellation of the GO.
- We see however that it is hard for supplying companies to define their 'products' on the market properly and that therefore consumers are badly informed. The GO-systems are not always properly implemented, are in many cases not standardized so that cross border trade is difficult to track, and above all disclosure rules are hardly developed in many countries. As a consequence the Customers are not properly informed.
- As RECS International we want to point out three aspects:
 1. More and more consumers (most of the time corporate companies) choose specific green products, based on the GO, for all sorts of reasons, but for carbon claims in particular. The volumes tracked with the standard systems as implemented by the Issuing Bodies, members of the Association of Issuing Bodies (AIB), are substantial and will exceed 300 TWh this year. These volumes can **no longer be neglected!**
 2. We believe that basic regulation is implemented (especially in Directives 2009/72/EC and 2009/28/EC) but that these regulations are poorly implemented. We believe CEER has a role to **improve the implementation** of the existing regulation
 3. European initiatives are taken for improvements that are not sufficiently supported on national and European level. Especially the work of **AIB** and European Platform Electricity Disclosure (**EPED**) supported by the **RE-DISS** project) are not sufficiently supported. We believe that CEER has a role in supporting the work of AIB and EPED.

We realize that we are very short in our comments.
You can always contact us for further explanations.

Best regards,

Peter Niermeijer

Peter Niermeijer
Secretary General RECS International