
Survey response 3

Contact details and treatment of confidential information

Contact details [Organisation]
CertiQ and Vertogas
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

For electricity, this recommendation is sufficient. For gas, the legal framework does not yet seem to support this.

The recommendation refers to Directive 2019/944, but that Directive only sets out rules for (disclosure of) electricity. Even in the absence of provisions for energy source disclosure of gas similar to those for electricity in Annex I of Directive 2019/944, justification for claiming the renewable origin should involve GOs, especially since article 19 of Directive 2018/2001 specifically introduced issuance of GOs for gas.

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

The phrase 'if applicable' suggests that there may be cases where the harmonised format and minimum standard need not apply to non-renewable sources. To enable truly transparent comparison, the format and standard should without exception be the same for all energy sources.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

This recommendation builds on the assumption that the average consumer is aware that any renewable share of energy supplied to them is exclusively conveyed through GOs, regardless of what the production mix in their country or region might look like.

GOs can indeed reliably provide additional information to a consumer who purchased a specific 'green' product. However, it is equally important to inform those consumers who have not purchased such a product. They ought to be made aware that even if the production mix in their country or region may be (relatively) 'green', the sale of the corresponding GOs may cause their consumption mix to become 'polluted'. Since Directive 2019/944 does not require all energy origin (i.e. including non-renewable) to be disclosed through GOs, this cannot simply be achieved by providing more information on a GO: for non-renewables, there simply might not have been issued any.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

We agree, and we would like to emphasize the importance of the last sentence. With the introduction of GOs for energy types other than electricity, it has become essential to establish the renewable origin of energy that is converted to another type.

For example, neither:

- the (consultation of the) Delegated Act on the production of renewable transport fuels (Ares(2022)3836651); nor
 - the provisions of Article 27 as foreseen in the revision of Directive 2018/2001 (2021/0218(COD); RED III) as adopted by the European Parliament in its first reading;
- explicitly require that the renewable origin of electricity consumed in electrolysis be proved through GOs. In the absence of a proper, cancelled GO, such consumption cannot be considered 'green', and so neither can the resulting hydrogen.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

We fully agree.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

We agree, and recommend that the scope of this recommendation be extended from 'electricity' to 'energy', thus including:

- gas, including hydrogen; and
- heating and cooling.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

We fully agree. In the Netherlands, full consumption disclosure has been implemented with regard to electricity. In our experience as issuing bodies, the marginal cost of full disclosure (as opposed to only disclosing renewable origin through GOs) is negligible. Moreover, a (strong) case may be made that the cost of the GO system ought to be borne by market players collectively, and not just by those who wish to prove the renewable origin of energy they supply. In other words, it may be considered unfair for the GO system to be financed by the 'green' market players, whereas suppliers of non-renewable energy do not have to pay anything.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

As an aspirational statement, this is excellent. However, prices for GOs are typically agreed in OTC trades, hindering the likelihood of this being actually achieved.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

We fully support freedom of choice. By its very definition, the GO system enables such choice, indeed making it possible for suppliers to offer products relating to local or regional energy production. We agree that offering such choice benefits the consumer.

However, we must consider the context within which this recommendation is made. The consultation is called "Guidelines of good practice for trustworthy information on green offers and consumer protection against misleading marketing ("greenwashing")". Under that title, the present recommendation may unjustly give the impression that cancellation of 'non-local' GOs is 'greenwashing'.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

We fully agree.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

We in fact believe that this should not relate to green offers, only. Whatever the offer, the consumer should be able to verify the accuracy, even if such offer relates to non-renewables, or a non-distinctive energy product. See also our response to recommendation no. 3.

General additional comments Please add any relevant comments that are not on a specific GGP here.

CertiQ is the Dutch issuing body for guarantees of origin for electricity and renewable thermal energy. Vertogas is the Dutch issuing body for guarantees of origin for renewable gas, including hydrogen. The present response to the consultation consists of the collective views of CertiQ and Vertogas. We thank CEER for providing the opportunity to share, and will be happy to further discuss upon request.

In addition, we would like to note that Guidelines of good practice in this day and age would not be complete without a reference to granular certification, i.e. the issuance of GOs for time intervals of one hour or less. EnergyTag demonstrator projects have shown that it is possible to match production and consumption of renewable energy on an hourly basis.

Granular certification addresses an oft-voiced concern that the GO system does not necessarily explain how renewable energy can be supplied at times when the sun was not shining and the wind was not blowing. Moreover, it may be essential to the integration of storage of renewable energy in the overall energy system.

Survey response 8

Contact details and treatment of confidential information

Contact details [Organisation]
UPRIGAZ
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ is attentive to ensuring that consumers have complete and reliable information on the energy mix of the various offers presented as green, mainly if this information is presented on independent Comparison Tools controlled by public the authorities. This information must be consistent across all Member States.

Offers qualified as green must, at a minimum, mention the percentage of green electricity or gas they contain.

On the other hand, the consumer does not necessarily need to know the amount or the share of public support from which the offer that is proposed to him has benefited.

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ is in favor of harmonizing the information provided to consumers throughout Europe, according to dispositions to be put in place by European regulators.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

The information on State aid incorporated in the price offers does not seem to us to be an essential element of transparency. UPRIGAZ considers that the information that must be brought to the attention of consumers in the GOs on the origin of electricity or renewable gas can be limited to the country (and possibly the region) of production of electricity or gas. Information on the precise place of production seems to us to be of no real interest for the majority of consumers.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ considers as very important to strengthen consumer's confidence in the information given to them by suppliers on the origin of the energy they consume. The GOs must be the only tool used to justify the origin of the energy consumed. It seems logical that, at least in a first period, we should focus on three categories of GOs: renewable electricity GO, hydrogen GO and biomethane GO. On the other hand, each of these categories must be subject to extensive harmonization in Europe so that a GO issued in Denmark, for example, is comparable to a GO issued in France or Spain.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ subscribes to the proposal to identify areas for improvement of the GOs by insisting on the reliability of the information attached to the GOs. On the other hand, it seems to us that this information should not be too detailed because it would harm the readability of the GOs.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ is in favor of the harmonization at European Union level of information attached to GOs. This harmonization seems essential to us both to improve consumer confidence and to develop an European system for exchanging GOs on an organized market.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ considers that the GOs attributable to electricity must relate to renewables. Electricity of nuclear origin cannot benefit from the same guarantees of origin as renewable energies. The consumer must, in particular, be able to be informed that the electricity he consumes contains a component of thermal or nuclear origin.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ considers that the gradual integration of the gas and electricity markets will not have an impact requiring a revision of the GO mechanism, except to consider that the gas market will very quickly turn green with the integration of biomethane and hydrogen. Even in this situation, it seems logical to us to dissociate GOs ENR electricity from GO biomethane or hydrogen. Moreover, as indicated in our response to point 1, UPRIGAZ considers that the consumer does not necessarily need to know the amount or the share of public support from which the offer offered to him has benefited.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ is not in favor of the multiplication of GO types, such as specifying that the energy attached to a GO is produced locally.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

UPRIGAZ unreservedly subscribes to the distinction between GOs and labels. Labels do not necessarily guarantee objective information for consumers and there is a risk that the generalization of labels will reduce the trust that consumers must place in GOs and devalue them.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

It is up to the competition and consumer protection authorities in each Member State to ensure the accuracy of the information provided by suppliers on the green offers tendered to consumers.

General additional comments Please add any relevant comments that are not on a specific GGP here.

Survey response 9

Contact details and treatment of confidential information

Contact details [Organisation]
Bosch Thermotechnology
Please choose from the options below the level of confidentiality of your answer.
Public, but some sections may be confidential as indicated in individual questions

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

Transparency towards customers is key; in this respect the recommendation can help whilst it should be ensured that consumers are able to buy products with a higher share of renewable energy than the average share of the supplier mix:

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

information should also be based on the requirements of the renewable energy directive and to the extent possible build upon existing schemes to avoid disproportionate burden during the scale up process.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

This recommendation could help ensure a real European market for renewable energy is created. In addition, the use of GOs as the "only instrument for tracking energy sources in green offers within disclosure systems" can help ensure obligations are met through easily accessible and verifiable tools. In this context, the use of gas or electricity GOs for heating and cooling purposes - whether in district heating and cooling, cogeneration or individual heating systems such as standalone or hybrid boilers, should also be allowed without the need to convert them into a "heating & cooling" GO which could create undue administrative burden. As the only instrument for tracking energy sources, these GOs should also help count towards obligations for suppliers or individual consumers.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

Best practice exchanges between sectors in the view of creating a common platform should be supported and accelerated.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

The competent body for disclosure should focus on electricity all other forms of energy considered in (a) GO system(s).

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

General additional comments Please add any relevant comments that are not on a specific GGP here.

Survey response 10

Contact details and treatment of confidential information

Contact details [Organisation]
Association of Issuing Bodies ivzw
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

<p>Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.</p>
<p>This text is ok. Some further improvement suggestions:</p> <p>1) <input checked="" type="checkbox"/> Note that Comparison Tools in most cases only display the 'green promise' for future supply, as they show the electricity and gas products that are being offered at that time. The supervision exercise that member states perform in accordance with Annex 1.5 of the IEM Directive 2019/944(EU), by its nature can only confirm retrospectively the justification of the claims, by confirming the volumes of cancelled guarantees of origin per supplier per product for the previous year of supply. Text could therefore be added to this recommendation that "Comparison Tools should also include a reference to a summarising result of the supervision exercise by member states on the supplier disclosure obligation, as a verification basis for consumers on their supplier's behaviour in the preceding year".</p> <p>2) <input checked="" type="checkbox"/> delete 'if feasible' in the following: 'If feasible, information should be provided on the share of energy that did not receive benefit from public support.'</p> <p>3) <input checked="" type="checkbox"/> Recommend including a mirroring text for gas as the one that exists for electricity in IEM Directive Annex 1.5, namely a requirement for suppliers to disclose to their customers the energy source of all supplied gas, and a supervision obligation on MS.</p>

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

1) The AIB disclosure platform should be institutionalized.

The disclosure platform should analyze the European implementation of disclosure in a review and publish it by 2024.

The platform should talk about EU wide harmonization of electricity/gas/energy disclosure.

Ideally, this is a task for NRA cooperation: even if a MS may designate another authority as disclosure supervision authority, cooperation could be coordinated within CEER. Alternatively, it might be hosted under another European institution.

2) Re-include harmonisation to be "at least on a national level"

"The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure, both ON A NATIONAL and European LEVEL, that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources) and should specify the level of detail required for this information and how such information is communicated to consumers."

Reason:

Harmonized format, minimum standard for displaying information, etc. was originally set in the recommendation number 2 in order to enable consumers to compare offers and choose accordingly. This competition is played in every Member State, so it was considered that this uniformity should be considered at national level.

The proposed change in this recommendation deleted the references to national level, where are relevant, and it seems to change it by cooperation at European level -already included in recommendation 6-. This change of horizon could reduce the effectiveness of the recommendation, as currently there is no European standard for displaying information.

3) Delete 'if applicable'

The phrase 'if applicable' suggests that there may be cases where the harmonised format and minimum standard need not apply to non-renewable sources. To enable truly transparent comparison, the format and standard should without exception be the same for all energy sources.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

These are good additions:

Making energy source and geographic origin of GOs more transparent by fostering active communication about these attributes, is useful. Geographic origin should be considered to become mandatory for electricity disclosure in the EU.

But don't withhold information on non-renewables from the residual mix:

This recommendation builds on the assumption that the average consumer is aware that any renewable share of energy supplied to them is exclusively conveyed through GOs, regardless of what the production mix in their country or region might look like.

GOs can indeed reliably provide additional information to a consumer who purchased a specific 'green' product. However, it is equally important to inform those consumers who have not purchased such a product. They ought to be made aware that even if the production mix in their country or region may be (relatively) 'green', the sale of the corresponding GOs may cause their consumption mix to become 'polluted'. Since Directive 2019/944 does not require all energy origin (i.e. including non-renewable) to be disclosed through GOs, this cannot simply be achieved by providing more information on a GO: for non-renewables, there simply might not have been issued any.

Proposed rephrase for the recommendation:

References in the energy bill to where additional information is available, such as the type of energy source, the geographic origin (country or, if applicable, region) or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g., on the website of the supplier and/or of the competent body for disclosure). This information shall be based only on the guarantees of origin that are cancelled in accordance with the relevant consumption, or in their absence, on the residual mix. For renewable energy sources, information on the type of renewable source should be made available to the consumer.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

These are good additions.

We agree and we would like to emphasize the importance of the last sentence. With the introduction of GOs for energy types other than electricity, it has become essential to establish the renewable origin of energy that is converted to another type.

For example, neither:

- the (consultation of the) Delegated Act on the production of renewable transport fuels (Ares(2022)3836651); nor
- the provisions of Article 27 as foreseen in the revision of Directive 2018/2001 (2021/0218(COD); RED III) as adopted by the European Parliament in its first reading;

explicitly require that the renewable origin of electricity consumed in electrolysis be proved through GOs. In the absence of a proper, cancelled GO, such consumption cannot be considered 'green', and so neither can the resulting hydrogen.

Include Energy Carrier Conversion in the reason for system convergence:

Handling GOs in relation with conversion between energy carriers is another reason for convergence of the GO systems of the various energy carriers. Suggested addition: "national GO system convergence should be encouraged so that GOs are easily tradable across Member States and that their handling in relation with energy conversion is kept reliable and efficient".

Consider limitations for heating and cooling GOs:

For heating and cooling, GO systems shouldn't be designed such that GOs are tradable between geographically separated grids. Including attributes of non-interconnected grids in the residual mix is unlikely to be considered a trusted mechanism by consumers.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

Agreed.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

Agreed.

In addition,

Disclosure Competent bodies would benefit from publicly available recommendations or guidelines on supervising the suppliers and/or consumers with disclosure obligation.

and, we recommend that the scope of this recommendation be extended from 'electricity' to 'energy', thus including:

- gas, including hydrogen; and
- heating and cooling.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

Agreed.

In addition, harmonisation would also be welcome for:

- 1) determining the info on GHG emissions to be disclosed
- 2) reporting deadlines to ensure a consistent calculation of the European Attribute Mix, which is an essential component of a reliable Residual Mix
- 3) shortening the reporting deadlines so that calculating and publishing residual mix can be done earlier than by 30 June to provide customers up to date information for example in CSR reports.
- 4) Not to allowing ex domain cancellations in any form: this facilitates accurate residual mix calculations and transparent disclosure.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

Agreed.

This is however unlikely to succeed without a legal mandate to require GO price reporting by traders at the time of their GO transaction.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

Transparent information to consumers is applauded, to facilitate freedom of choice, but don't undermine the trust in non-local GOs.

Equal quality assurance is in place for local as for non-local GOs, yet transparency to consumers on the geographical origin can strengthen the acceptance of renewable energy contracts.

Rather than imposing availability of choice to the consumers, it could be more effective to require suppliers to be transparent about the origin of GOs per offered energy product. This transparency could also be provided through information from the disclosure responsible body.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

Agreed.

Remark:

It is unclear what the second new paragraph aims for. It says that too many labels increase complexity but no solutions are provided. We suggest to foresee some form of notification schemes towards the NRA (/disclosure authority).

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

We appreciate maximum transparency. We are concerned that burdening consumers with the task of verifying the accuracy of the offer isn't reasonable. The accuracy of electricity disclosure should be verified by the disclosure bodies.

National level disclosure portal/dashboard could be implemented to provide information to each customer to show them the information about GO-s cancelled to prove the origin of the renewable energy consumed.

An EU wide system of electricity disclosure checks should be set up.

General additional comments Please add any relevant comments that are not on a specific GGP here.

Consider facilitating the transition to granular certificates

Guidelines of good practice in this day and age would not be complete without a reference to granular certification, i.e. the issuance of GOs for time intervals of one hour or less. The EnergyTag demonstrator projects have shown that it is possible to match production and consumption of renewable energy on an hourly basis.

Granular certification addresses an oft-voiced concern that the GO system does not necessarily explain how renewable energy can be supplied at times when the sun was not shining and the wind was not blowing. Moreover, it may be essential to the integration of storage of renewable energy in the overall energy system.

At minimum on a monthly basis, synchronisation of production and consumption should be promoted/encouraged.

Don't only regulate supplier claims, but also consumer claims, regarding their relation with GOs

Proposal to add text like the following in the legislative framework, on national basis, if possible also on European basis:
"Claiming the consumption of energy from renewable sources or the associated environmental benefits is only allowed on condition that:

A) guarantees or origin are cancelled to cover this claim, or

B) (only if applicable, where no GOs are issued for the energy represented by the claim, another reliable tracking system prevents the double claim of the corresponding batch of renewable energy, or)

C) the represented energy is part of the residual mix in the country of consumption, or

D) The energy is produced on the site of the consumption, no guarantees of origin are issued for it and it is not included in any claims at other consumption sites.

Guarantees of origin are only issued for energy of which the attributes are not otherwise disclosed."

Argumentation:

It needs an exclusive framework for instruments that can be used for claiming consumption of energy from RES. Some have raised an argument that it may take more than a GO for claiming climate neutrality of energy, particularly in the case of biomethane, but not including the GO in such claim is simply wrong. Stopping consumers to make claims on the origin of their energy and the related climate impact seems quite impossible, so it needs to be clarified which are allowed ways for making such claim. The current legislative framework only regulates claims by SUPPLIERS of electricity (and soon also for grid-transported gas), but consumers' own claims and claims related to consumption of vehicle-transported gases, are not regulated. This risks a variety of instruments to be used for such claims, which may cause the same environmental attributes to be claimed more than once in relation with energy consumption.

Ensure consistency between corporate emissions reporting and the claims in the GO system: only cancelled GOs or the residual mix can back an environmental claim by an energy consumer

Recognise the importance of the voluntary initiative of the GHG Protocol in corporate claims and influence it to prevent double counting of energy that is represented by Guarantees of origin.

The biggest problem is that the GHG protocol allows the option of location-based GHG claims. That may be triggered by US and other non-EU configurations. But in Europe, where the GO system is to be used for disclosure of the origin of electricity and gases, location-based claims cause direct double counting. Furthermore, such location-based claims disincentivise consumers to make a difference with their sourcing choices (incl PPAs). GOs, as a market-based instrument, do facilitate this, as long as they are not undermined by other mechanisms.

A consumer claiming the environmental benefits of electricity for which the renewable origin is exported with GOs is simply undermining all the strengths and credibility of the GO system, penalising also the parties who adequately participate in the GO system. .

This problem of consumer claims that are not backed by cancelled GOs, maintains to risk undermining the whole GO system, even though there is no alternative mechanism that has a better potential for avoiding double claims. GOs are the proof of uniqueness, by legal design. Yet therefore it would make sense to include a prohibition on consumer claims that are not properly backed by GOs. Currently only supplier claims are regulated, consumers aren't. Therefore a prohibition on such non-GO backed claims, as proposed in previous comment would be good to add in legislation.

Where available, information on the sustainability characteristics of the represented gas (PoS) needs to be an attribute on gas GOs to avoid double counting of gas molecules through use of parallel certification systems.

Survey response 11

Contact details and treatment of confidential information

Contact details [Organisation]
Fluxys
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

<p>Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.</p>
<p>Recommendation 1 should be accompanied by the inclusion of all carriers in one Union Database (electricity included) for purposes of facilitating comparability and transparency. The Union Database (UDB) should (i) serve as a "single system" for all renewable and low carbon carriers in order to avoid information fragmentation and potential errors and double counting and (ii) be based on the principle of mass balance by consignment (this latter implies a simultaneous application of the mass balance principle and exchangeability of the commodities within a 'single logistical facility' the European interconnected gas and electricity grids represent).</p> <p>As a non-fragmented certification framework will be key for the uptake of decarbonised carriers, we also recommend one GO+ (i.e. guarantees of origin with proof of sustainability info incorporated when relevant/available) covering all renewable and low carbon carriers. Such centralized system should be (i) transparent, (ii) harmonized across different carriers and molecules (including H₂) independently from how these are actually transported, and (iii) attribute the relevant sustainability criteria based on the greenhouse gas emissions and life-cycle assessment.</p> <p>The GO+ system should allow the registration of renewable and low carbon carriers production and be compliant with the EU Union Database specs. Thanks to this integrated approach, the conversion among energy carriers will be performed in a more consistent way, sector coupling will be facilitated, and single use will be better ensured. Such centralized system should consider the European interconnected electricity and gas infrastructures as a 'single logistical facility', in order to make trading easier (eliminating all unnecessary reporting at each single internal interconnection point, registering only the network injection and withdrawal points). This enhanced robustness implies that GO+ certificates should also be accepted for renewable targets compliance.</p>

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

Developing pan-European standards is essential to avoid unnecessary paperwork and administrative hurdles and hence minimizing transaction costs for users. In this sense, an aspect that could complement Recommendation 2 would be to ensure that cross-border exchangeability of titles through the single logistical facility always works automatically across Member States without the need for specific cross-border declarations. For the remainder, cross-border paperwork should avoid reporting redundancies and be simplified to the maximum extent possible.

An aligned framework for accounting towards targets will be a key success factor for creating a European market for renewable and low carbon gases. In contrast to electricity, where Member States use production to account for targets, consumption is used for gases. Thus, the gas scheme indirectly disincentivises exports as Member States may want to prevent leakage abroad of a resource subsidised at national level for targets. As a result, this creates an obstacle for a well-functioning European market for decarbonized gases.

Moreover on the level of renewable transport fuels, the market encounters additional obstacles as Member States are allowed and in many cases apply (protective) rulings for compliance with their targets for transport. Consequently renewable fuels compliant with EU rules (and certified by EU voluntary schemes), when not produced in the Member State itself are not eligible for targets, hindering import and export of such fuels. As in RED III the concept of RFNBOs will not be limited to transport, there is a great concern that the same obstacles would apply for these, especially when the burden of proof (related to the delegated act for RFNBOs as proposed today) will be cumbersome and complex. Cooperation at European level and simplification of cross-border and cross carrier administrative burdens is essential.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

This should be sufficient. Please notice that the concept of introducing temporal and geographical correlation to GOs is not recommended. GOs are not suited as congestion management or balancing tools (instead specific congestion management and capacity allocation or balancing rules are considered more efficient).

Temporal and geographical correlations in GOs may help collect "additional congestion rents" from users but... (1) The infrastructures to which they are applied are a EU single logistical facility, (2) The allocation capacity process for these correlations would be virtual (at best) not matching the real one used and potentially introducing distortions, (3) In any case, commercial and physical flows are not meant to be equal (required for logistics optimisation) and, last but not least, (4) Any certified energy is an exchangeable commodity within the single logistical facility (thus the key would be the in/out netting and no double counting, not temporal and geographical correlation).

In fact, such correlations would introduce a contradiction in the purpose of the GOs (origin, instead of congestion management), to the single logistical facility character of the grid, and to the exchangeable commodity character of the carriers within it transported. Interfering with congestion management processes should be avoided as it could create additional distortions, inefficiencies and costs, which in turn demand more infrastructure needs due to efficiency problems.

Finally, the introduction of additionality rules for RFNBO GOs has not been subjected to any CBA or impact assessment. It would be recommendable to perform these on any introduced rules from a whole energy system perspective.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

Recommendation 4 is correct provided gas GOs should be for all gaseous carriers. The type of carrier, its purity, and other aspects should be treated as GO attributes (information), rather than constitute the basis for a multitude of separated GO systems (e.g. one for biomethane, one for H₂ at quality 99.9%, another one for H₂ at quality 98%, etc...) – i.e. GOs for the clean MWs of energy (and not the carrier which nature and specifics would be described transparently in the attributes of the single GO system -ideally for all carriers, but at minimum for all gases) and, in doing so, avoid complex disclosure rules that might differ in Member States.

This will facilitate synergies by easing cross carrier conversions. It should be highlighted that sector coupling (electricity, gas, heat) is essential for the whole energy system efficiency. It is not possible to perform sector coupling if a coupling of GOs (through easy conversions, tradability and lack of markets fragmentation) does not take place before.

In this sense, the current discussion on whether GO disclosure (or their cancellation otherwise) should be made dependent on infrastructure type (this means, in fact, the purity of the carrier used as standard in that grid) would also fragment the GO markets. The GO system should aim at certifying the renewable or low carbon energy amount of any future energy carrier. It should not aim to certify one single standard purity level, nor relate to a specific transportation system, nor interfere with the disclosure process of the carrier by clients (the actual use of the certificate). Additional information on purity can be provided under informative fields like "carrier type", but this attribute shall not be used as an excluding threshold for disclosure of the GO (referred to MW instead) at final consumption, to avoid creating fragmented markets and administrative barriers. A single market and registration body would create consistency for liquidity and facilitate cross-border trade.

Moreover, enabling consumers to access a single and well-integrated decarbonised gas market is imperative for affordability. Certification should not create an additional hurdle but rather an instrument to ramp-up decarbonisation. In this sense, it is also important not to constrain new small clean hydrogen producers to increase their quality standards artificially. Consequently, integrating hydrogen purity as a threshold for use of the GO should be avoided. Where required, mature solutions are available to cope with specific purity needs (in certain industries), rather than causing market fragmentation. Moreover from an utilization point of view, customers indicate that it is more relevant to look at the impurities present (e.g. sulfur, carbon monoxide, etc...). Targeting purity according to the different market needs will also optimize societal cost. Having different rules for hydrogen (or even worse, for one hydrogen purity format in exclusivity against others: 99.9%, 98%, etc.) would also create inconsistent rulings with respect to GOs of different energy carriers.

To illustrate it with one example: If disclosure/cancellation (use) of the GOs is made dependent on infrastructure type (i.e. hydrogen GOs with 99.9% purity can only be used in 99.9% hydrogen grids); this would mean that a customer using 1MW of green hydrogen in a 99.9% local grid will just need one GO, whilst another client in the European Hydrogen Backbone sourcing that very same 1MW of green hydrogen from the same local grid (operated at 99.9%) will need to convert the initial GO at Backbone Gate into another GO for Gas with attributes (Gas Type) Hydrogen and (Purity) 98%. This even if that client filters the hydrogen back to 99.9% purity, and the whole for no particular reason (1MW of green hydrogen in both cases, which gets adjusted to volumes in function of the attributes on purity at production and disclosure). The only effect of this measure is to fragment GO markets, grant GO exclusivities to certain specifications artificially, make the system less future proof on aspects that are still variable/being defined and should be left open and make clients pay more for the same functionalities.

In order to create a European market with maximum liquidity and transferability of GOs, it should be avoided that Member States impose additional rules on classification, mass balance requirements, or restrict accounting for targets with special local rules (using powers delegated from European Directives), isolating their own markets de facto and hindering interchangeability. The current proposal to make "disclosure/cancellation rules dependent on infrastructure" a Member State competence is suboptimal in this sense. Instead, the creation of a European standard should set the non-dependence of GO disclosure on infrastructure type (also to facilitate coupling), whilst today some suggestions for this EU standard creation go in the opposite direction.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

Recommendation 5 about sharing good practices on disclosure across carriers is appropriate but should be generalised (should not be a one-way direction from electricity towards gas or heating/cooling). As a summary of best practices sharing from gas, not just for disclosure (cf. Recommendation 4 above), we would recommend:

- One "GO or GO+ (with PoS)" system for all green gas with quality and gas type as attributes
- Amount of the GO related to the production (irrespective of blending afterwards) in energy (MWh)
- Disclosure and cancellation standardised and independent from infrastructure
- "GO+" to incl. Proof of Sustainability where needed (transport) and be registered in UDB
- Single system for clean, green gas & elec. (UDB plus mass balance by consignment)
- Cross border exchangeability and fungibility within the EU single logistical facility
- DA additionality discussion is not fact-based (no CBA on impacts) -should be reassessed
- No temporal and geographical correlation/locational matching needed in GO+

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

This is a first step, but it is probably not sufficient, it would be more convenient to avoid double use to ensure that electricity GOs are also included into the UDB with all the rest of the carriers for enhanced traceability. This would also facilitate GO conversions.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

GOs should be restricted to clean and renewable electricity – i.e. electricity from "all sources" (as quoted) should be excluded since much of it is fossil, or reliant on fossils for ancillaries. The application of residual mixes to electricity GOs disclosure does not seem a recommendable step in terms of reliability of the no double use and the actual guarantee of origin.

In contrast to GO+ (with PoS), where lifecycle GHG emissions are considered as footprint and sustainability rules are applied (not just for RFNBOs but also for biomass), electricity GOs for renewables do not incorporate any GHG footprint related to fossil grid ancillary services they cause (at system level by the renewable production). System averages remain not recommendable, but if they were to be applied in the disclosure of electricity GOs, they should render the real footprint of renewables more realistic and set a better level playing field for all carriers on the basis of their environmental merits.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

Sector coupling and synergies across carriers are essential for energy efficiency. It is a necessary condition for sector coupling to achieve first a coupling of GOs across borders and across carriers: facilitating carrier conversions, interoperability, liquidity, efficiency and lower transaction costs. In this sense, the information on subsidies is a good attribute to have, but much more is necessary. There are also hidden subsidies/support to sectors which are costly for society and are not reflected (like the derogations from the Clean Energy Package Rule to the 70% electric line capacity for markets, or the way in which the Primary Energy Factor is calculated, or preferential treatments in ETD and many others). As energy affordability is a key success factor for the buy-in of the energy transition, more transparency is needed for customers. GOs can play a role in this, but they will only be able to address certain limited aspects. Information on supported vs. non-supported installations is one of these but is far from being exhaustive.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

Within a single logistical facility concept, inherently, this no longer matters. For other ones (not related to a single logistical facility), the attributes of GOs already include the producer and location, meaning potentially this choice is already possible. However, it is important that we do not fragment sub-markets from the market, especially when this would be harming logistics. GOs are neither meant nor recommended for use as a congestion management tool. GOs should guarantee renewable origin of a given MWh, congestion management and ancillary markets should be left to do their job with no distortions stemming from certification.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

Depends on how the labels are organised and designed. Making labels better fit for purpose and accurate is always a no regret decision. In each case, labels should not contain distorted information leading to possible wrong decarbonisation consumer decisions, additional costs for users, and label credibility issues in the long term.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

Correct.

General additional comments Please add any relevant comments that are not on a specific GGP here.

Survey response 13

Contact details and treatment of confidential information

Contact details [Organisation]
German Environment Agency (Umweltbundesamt)
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

delete the following: in particular those operated or trust marked by a public authority or body

delete if feasible in the following: If feasible, information should be provided on the share of energy that did not receive benefit from public support.

The reason for deleting these parts is that voluntary standards or regulation of only a part of actors always leads to some actors complying with the standards and others not complying. In this particular case this can lead to the situation that paragon green tariffs will be promoted in well complying CTs and fossil tariffs where disclosure really is important will be promoted by non-complying CTs.

New 1 Updated:

All Comparison Tools (CTs) should provide a clear indication of the product mix and supplier mix for each product listed in the CT. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to the consumer (no matter whether they consume electricity and/or gas). Information should be provided to give an account of the share of energy that did not benefit from public support.

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

The AIB disclosure platform should be institutionalized and put under EU-commission supervision.

The disclosure platform should analyze the European implementation of disclosure in a review and publish it until 2024.

One purpose of the platform should be to talk about EU wide harmonization of electricity/energy disclosure.

New 2 Updated:

The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources) and should specify the level of detail required for this information and how such information is communicated to consumers. To foster cooperation, the AIB disclosure platform should be institutionalized and put under EU-commission supervision. The disclosure platform should analyze the European implementation of disclosure in a review and publish it until 2024. One purpose of the platform should be to talk about EU wide harmonization of electricity/energy disclosure.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

Yes, making energy source and geographic origin of GOs more transparent by fostering active communication about these attributes, is useful. From 2023 electricity disclosure in Germany requires the country of origin of GOs to be shown. Disclosing the country of origin should be considered to become mandatory for electricity disclosure in the EU.

New 3 Updated:

References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region) or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g., on the website of the supplier and/or of the competent body for disclosure). Disclosing the country of origin should be considered to become mandatory for electricity disclosure in the EU.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

Concerning heating and cooling, GO systems aren't designed such that GOs are tradable between geographically separated grids. Trading these GOs between separated Grids should not be possible.

New 4 Updated:

Member States should have a GO system in place for "(i) electricity; (ii) gas, including hydrogen; or (iii) heating or cooling". For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g., EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". Trading these GOs between separated Grids should not be possible.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

It appears useful to identify good practices as a first step. But they have to result in EU regulation as well.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

In addition, it should be thought about establishing a common practice for checking correctness of companies' electricity disclosure.

New 6 Original:

Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at national level. In addition, it should be thought about establishing a common practice for checking correctness of companies' electricity disclosure.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

The paragraph sounds like a commonplace. It is unclear what should be achieved with the paragraph and what is meant by price information for products.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

GOs specifying the location of supported renewable electricity installations are issued in Germany. We aren't sure whether this is something which can foster the energy transition.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

It is unclear what the second new paragraph aims for. It says that too many labels increase complexity but no solutions are provided.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

We appreciate maximum transparency. We are concerned that burdening consumers with the task of verifying the accuracy of the offer isn't reasonable. The accuracy of electricity disclosure should be verified by the disclosure bodies. An EU wide system of electricity disclosure checks should be set up.

New 11 Updated:

When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to understand how the offer to which they subscribed is assembled to count as "green". The accuracy of electricity disclosure should be verified by the disclosure bodies. An EU wide system of electricity disclosure checks should be set up.

General additional comments Please add any relevant comments that are not on a specific GGP here.

Survey response 14

Contact details and treatment of confidential information

Contact details [Organisation]
EnergyTag
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Public

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

We agree with this recommendation, however, to ensure the highest level of transparency, we think that, if available, Granular Guarantees of Origin (GGOs) should be used where maximal transparency is sought for green offers based on electricity. These hourly certificates provide information not only regarding the energy source, but also the exact time of production of electricity, thereby helping green offers match their demand with green energy on a (sub)hourly basis. Such an approach of time and location matching is supported by system operators and leading energy systems academics i.a. ENTSO-E ("Views on a Future-Proof Market Design for Guarantees of Origin") and multiple studies performed for example by TU Berlin ("System-level impacts of 24/7 carbon-free electricity procurement in Europe") or Princeton University ("System-level Impacts of 24/7 Carbon-free Electricity Procurement") as this approach drives investments in storage and lowers system-level emissions more effectively than the annual-based clean energy procurement strategies.

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

We agree with this recommendation, again highlighting the importance of providing the possibility to use GGOs if they are available. For this system to be trusted and reliable, cooperation at a European level is crucial. It is worth mentioning that European institutions already proposed the use of GGOs, for example the European Parliament, and that Granular GOs are likely to be included in the RED "III".

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

We agree with this proposal. Information on the geographic origin of the energy source is indeed crucial, to enable the choice of electricity coming from local sources, to encourage the development of clean energy in the regional grid. However, locational information is most useful and transparent for consumers when the time of generation is also disclosed. For a consumer knowing the location of solar power is useful, but knowing the time of day and location of production is even more useful for consumers who may want to only make solar energy claims for their daytime consumption, not for nighttime consumption. Granular GOs are the tool that can provide this information to consumers.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

Yes, we agree that green offers must be based on GOs. However, we do believe that, when available, the use of Granular Guarantees of Origin should be enabled for the most transparent form of Green offer. It should be noted, that the European Commission's current draft Delegated Act for Renewable Fuels of a Non-Biological Origin (i.e. Hydrogen) would require proof of hourly matching of green electricity production and green hydrogen production in electrolyzers. If this is maintained in the final Delegated Act, then it will be critical that Granular GOs for electricity are rolled out to ensure proper hourly disclosure for hydrogen production and hence robust issuance of related Green hydrogen GOs.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

We agree fully with this statement. We think part of the assessment should also look into the benefits and practicalities of hourly disclosure using Granular GOs and associated benefits for the European electricity system and consumer transparency This is in line with ENTSO-E's recommendation for a more time and location specific GO system.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

We agree.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

We would also like to highlight that a methodology for hourly residual mix is currently being developed by various stakeholders. This can inform an EU wide method for an hourly residual mix based on Granular Guarantees of Origin. We believe that the most reliable disclosure system would be achieved with an hourly Granular GO certification system, in a commonly agreed upon and accepted framework.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

We agree with the above statement and we furthermore believe that Granular GOs would send the most representative price signal to the market, thus not only largely increasing the transparency and competition, but also providing the necessary incentive for technologies such as energy storage systems, clean dispatchable generation and other carbon-free sources that lack such incentive in the current system. Providing Granular GOs could enable these technologies to achieve the competitive advantage necessary to bring them into the market and only a properly designed GO system can incentivise that change.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

We agree with the statement. As research shows (TU Berlin, Princeton University) matching energy consumption and production locally is important in order to provide the right incentives for technology development in each region and ensure a net-zero energy system can be achieved everywhere. Furthermore, trading clean energy certificates and transfer between countries and regions that either have a very low level of interconnection, or no physical grid interconnection at all, is viewed by some as a weakness of the current GO system. These concerns are mainly a result of much larger clean energy certificates transfer than the physical energy imports and exports between these regions. Local matching must be paired with hourly matching to ensure the strongest market signals, aligned with physical grid reality.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

We agree with this statement, as we believe consumer transparency is very important. The most transparent labels should include the time, location and energy source used for energy generation, since these encourage the development of technologies at the times and in the locations where they are most needed.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

We agree with this statement, highlighting that to ensure the highest accuracy the information should include time (hour) and location of clean energy generation and the source of energy.

General additional comments Please add any relevant comments that are not on a specific GGP here.

For clarification purposes, I sent an email to brussels@ceer.eu containing links to the studies mentioned in the response.

Survey response 15

Contact details and treatment of confidential information

Contact details [Organisation]
EDF
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

First, EDF would like to underline that the notion of "green" is not currently prescriptive. It is therefore necessary to define the term. The GGP should therefore recommend that the definition of "green" be harmonized and defined as "from renewable energy sources" (RES).

Second, the GGP should further recommend that the justification of "green" should be exclusively underpinned by the use of GOs. At last, EDF believes that the most relevant information for the customer to choose an offer is the product mix related to this offer. It therefore does not appear relevant and useful to provide the supplier mix in CTs.

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

EDF agrees to a certain extent to a harmonised format for displaying information about the origin of RES energy but of course depending on the level of detail required, as it may prove burdensome and costly to provide.

EDF recalls that the energy bill is a highly regulated document and that any evolution (even the format of the displaying information) must be anticipated in due time.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

EDF agrees with this recommendation on drawing customers' attention to the place where the adequate information can be found, beyond what is already mandatory in the bill.

EDF also recalls that the energy bill is a highly regulated document and that any evolution (even a reference) must be anticipated in due time.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

EDF agrees and moreover considers that GOs should also be used for the geographical origin of RES (locational information) and not only for determining the energy source as mentioned. EDF understands that this GGP primarily address green offers but the sentence is also valid for all other offers. EDF therefore proposes the following amendments :
"... GOs should be used as the only instrument for tracking every characteristic of energy sources in offers within disclosure systems, ...".

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

EDF agrees with this recommendation.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

EDF agrees with this recommendation.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

Extending full disclosure to all energy sources is not mandatory in the present framework and it should not be considered as a target in itself. It should remain left to subsidiarity to determine through a cost-benefit analysis the added value of such a process, as it could prove burdensome and costly to implement. EDF reminds that every electricity offer must already disclose its product mix, which is a form of full disclosure, except that the methodology used to calculate this product mix for offers not based on GOs may use the residual mix.

EDF therefore proposes the following amendment to the recommendation :

"Where full disclosure is not desirable or cost-efficient, a residual mix should be determined at national level."

As of today, only a few Member States have implemented full disclosure, but EDF would like to stress that in a system where everyone would apply it, full disclosure could raise some issues that would need to be examined (all the countries would not be able to import GOs, GOs would have to be issued even for small power plants, bijective allocation of all GOs to all consumed MWh (losses included) might be complex at European level...).

EDF agrees that in the absence of full disclosure, the calculation of a national residual mix remains the best solution. It has proven to be a very reliable and efficient one.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

EDF agrees with this recommendation but the sentence added is not precise enough and could lead to ambiguous interpretation as the word "products" could be understood either as GOs or offers. EDF therefore proposes the following clarification amendment :

"Price information for GOs from supported and non-supported installations should be shared publicly and be easily accessible."

EDF supports initiatives bringing transparency in the GO system and welcomes the recent EEX initiative of pan-European GO auctions which will provide transparency in the price formation of GOs. The extension of the auctions on forward contracts should be encouraged.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

EDF recommends to delete this recommendation since it does not appear necessary and it calls for clarification because it confuses two things.

Each GO has to mandatorily provide the local information (address) of a facility providing generation. Therefore suppliers are able to build offers based on one or more identified facilities, wherever such facilities are located (such identified facilities can be close to or remote from the consumption site).

GOs enabling the tracking of the geographical origin of energy, it is the role of suppliers to build or not such types of offers if they are likely to match customers' expectations, competition and innovation remaining the drivers for developing the kind of offers expected by customers.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

Being the legal and technical mechanism to guarantee the source of energy, EDF considers that GOs must be the basis, including for labels that are just a communication tool, and therefore proposes the following amendment to the recommendation:

"Labels must use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust."

EDF would also like to recall that simplicity and clarity are among the principles promoted by CEER and BEUC to ensure customer involvement and therefore agrees that too many labels could be confusing and alter customer trust.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

This recommendation is not relevant and not related to what happens in real life. It calls for the following remarks.

First, a supplier cannot provide ex ante (when subscribing) a customer with the necessary information enabling the customer to check the accuracy of the offer. Indeed, suppliers provide consumers with the number of GOs used (references) once subscription is done and consumption is ongoing. An ex ante verification is therefore impossible. The information that can be provided before the subscription of an offer is about the process and the information that the customer will receive (for example, telling the customer that he will receive the numbers of the cancelled GOs).

Second, it is not the role of the customer to check the accuracy of the offer. It is the role of public authorities (competition authorities, NRAs, etc.) to ensure a proper market monitoring to identify misleading offers and practices, so as to protect customers. The customer is entitled to be provided with trustworthy information. Engaging in the market is already complex for many customers. This recommendation would also imply forefront that the customer cannot trust the market.

At last, suppliers are committed to provide customers with more or less detailed information: for example, they are able to provide the numbers of the cancelled GOs used to certify the offers of the high end portfolio customers; but providing such very detailed information could be a quite burdensome and costly process when dealing with mass market customers.

General additional comments Please add any relevant comments that are not on a specific GGP here.

EDF believes that further improvement is needed concerning the terminology and the type of offers characterized as "green": the definition of "green" should be harmonized and mean "from renewable energy sources" (RES).

EDF welcomes these CEER works and of course shares that the customer is entitled to get adequate and accurate information on the sources of energy used to produce the electricity he buys and that he should be protected against misleading offers and practices. The information provided must however remain clear, simple and relevant in an already complex market.

Survey response 16

Contact details and treatment of confidential information

Contact details [Organisation]
ENGIE
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

Engie welcomes any initiative to increase transparency and the ease of proving the renewable nature of energy - be it gas or electricity.

The use of price comparators, whether public or private, should be facilitated and give clear and reliable indications on the content of green offers. The energy mix of green offers can be an interesting data. However, we believe that information on the share of this green energy that is supported or not is not necessary. Electricity or gas produced from renewable sources is green whether it is subsidised or not. Our customers who have an interest in these products do not make the distinction. Also, information about the share of energy mixes that benefits from public support is difficult to obtain.

It is important for any supplier to be able to prove the renewable nature of these green offers. We think important to insist on the fact that "green" terminology must be restricted to energy issued from renewables production. On the other hand, we believe that providing a lot of information in a very detailed way could undermine the clarity of the offers and lead to confusion for our customers.

We will of course follow the recommendations or obligations of the public authorities to mention in the comparison tools, the information concerning the subsidised or not of the green energy produced.

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

We certainly support the efforts to harmonise and bring clarity to the information shared with our customers - especially on green offers. However, as retail energy markets are managed on a national and sometimes even regional basis, we would not recommend a detailed comparison at EU level.

If this were to be proposed by the NRAs, suppliers could provide some interesting feedback and it would certainly be useful to involve them in the design and communication of minimum standards.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

We agree with the principle of informing our customers as well as possible about the origin of their electricity. However, we do not believe that the bill is the right place to detail the technology used, the geographical origin and the type of support received if this is the case. A dedicated and personalised dynamic online space could be made available to the customer - if technically feasible.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

This recommendation seems sufficient to us. We welcome the recognition of GOs as an instrument for the recognition of the renewable character of energy, the inclusion of renewable gases (biomethane and hydrogen) as well as the consideration of heat and cooling networks.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

We find this recommendation sufficient.

We think there should be a single platform for all energy vectors .

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

We find this recommendation sufficient.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

Full disclosure - where technically possible - would indeed bring great clarity and transparency to the supply of green products and thereby increase consumer trust. We recognise the GO system as the only one that can reliably provide the necessary traceability. However, we warn that the implementation of a full disclosure must be harmonised at EU level to ensure a level playing field and be based on the data provided by the Member States following general statistical rules provided by Eurostat. We insist on the fact that this should be done on a voluntary basis, only for interested customers and should be subject to impact assessment at MS level .

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

We do not believe that the distinction in green offers between electricity produced by subsidised and non-subsidised plants is of interest to retail customers. Energy produced from renewable sources is and will remain so even after the end of the financial support. Making this distinction is not of interest to our customers. Moreover, it could miss its objective by confusing and devaluing consumer interest in green offers.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

Indeed geographical indication could be included in the information provided within GOs, however, we stress the fact that it may be difficult to implement and would recommend a flexible approach where such a framework does not yet exist in some of the Member States.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

We recognise that the presence of many labels can be a source of confusion. GOs should therefore be used as a basis for the development of all green energy offers to consumers.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

The naming and proving of the green nature of an offer or product is widely discussed beyond the energy sector. GO provides a solid basis on which green claims can be made. We draw the attention of regulators to the importance of bringing the guidelines into line with the European legislative framework or at least in line with the Commission's plans. Plus, "green" terminology must be restricted to energy issued from renewables production.

General additional comments Please add any relevant comments that are not on a specific GGP here.

Survey response 18

Contact details and treatment of confidential information

Contact details [Organisation]
Enel SpA
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

We fully agree with the importance of clear information and transparency on green offers, so that consumers can make well-informed choices. However, it might be difficult or technically impossible for suppliers to provide too detailed information on the product mixes in the Comparison Tool.
Similarly, suppliers might not be in the position to provide information on the share of energy that benefitted from public support in the Comparison Tool. Moreover, this might not be particularly relevant to customers wanting to buy green products, as more likely, they will be interested in whether the energy is generated from renewable sources or not.
As a remark, customers seeking "green" products are most interested in whether their energy was generated from renewable sources, which might be integrated in the foreseen digital passport of products and/or certification as the Action Plan for digitalising the energy system announced for ICT products.

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

We welcome EU-level cooperation and harmonization as concerns the information provided to consumers. However, we would also like to highlight the risk of confusion for the consumer deriving from an excessive amount of information. In order to mitigate this risk, it would be preferable that only relevant information is provided to consumers (see also answer to point 1).
Furthermore, if a national approach is chosen which requires a wider range of data, a requirement should be in place for the development of a tool that filters the results and facilitates access to the information by consumers. This solution shall have consumers at the center, gathering all energy data of the consumer in one point of access, such as EU Digital wallets; which could gather metering, DR and switching data as per the Implementing Regulations stemming from Articles 23 and 24 of the Electricity Directive; and make use of the same standards for accessing information agreed in this set of Regulations with the energy sector.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

Generally speaking, we welcome the provision for a reference on the bill that allows the consumer to find more information somewhere else, as this solution is more efficient and beneficial for both the supplier and the consumer.

However, we would also like to stress that the information concerned might not always be available to the supplier due to technical features and different national provisions of the GO schemes.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel in this area is currently a work in progress.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel in this area is currently a work in progress.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

We find this recommendation sufficient.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel in this area is currently a work in progress.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

The information on supported/non-supported installations might not be particularly relevant to a consumer choosing a green product (see also answer to point 1).

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

Although we agree that the geographical indication on GOs might be of interest to some consumers, there might be implementation/operational issues to consider, in particular for domestic consumers (while it might be easier for large business consumers, who usually have ad hoc contractual terms).

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel in this area is currently a work in progress.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

We agree that consumers should have access to all of the necessary information to make a well-informed choice. However, when the consumer subscribes to an offer, some detailed information might not always be available to the supplier.

General additional comments Please add any relevant comments that are not on a specific GGP here.

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Survey response 19

Contact details and treatment of confidential information

Contact details [Organisation]
Enel SpA
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.

We fully agree with the importance of clear information and transparency on green offers, so that consumers can make well-informed choices. However, it might be difficult or technically impossible for suppliers to provide too detailed information on the product mixes in the Comparison Tool.

Similarly, suppliers might not be in the position to provide information on the share of energy that benefitted from public support in the Comparison Tool. Moreover, this might not be particularly relevant to customers wanting to buy green products, as more likely they will be interested in whether the energy is generated from renewable sources or not.

As a remark, customers seeking "green" products are most interested in whether their energy was generated from renewable sources which might be integrated in the foreseen digital passport of products and/or certification as the Action Plan for digitalising the energy system, announced for ICT products.

Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.

We welcome EU-level cooperation and harmonization as concerns the information provided to consumers. However, we would also like to highlight the risk of confusion in the consumer deriving from an excessive amount of information. In order to mitigate this risk, it would be preferable that only relevant information is provided to consumers (see also answer to point 1).

Furthermore, if a national approach is chosen which requires a wider range of data, a requirement should be in place for the development of a tool that filters the results and facilitates access to the information by consumers. This solution shall have consumers at the center, gathering all energy data of the consumer in one point of access such as EU Digital wallets; which could gather metering, DR and switching data as per the Implementing Regulations stemming from Articles 23 and 24 of the Electricity Directive; and make use of the same standards for accessing information agreed in this set of Regulations with the energy sector.

Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.

Generally speaking, we welcome the provision for a reference on the bill, that allows the consumer to find more information somewhere else, as this solution is more efficient and beneficial for both the supplier and the consumer.

However, we would also like to stress that the information concerned might not always be available to the supplier due to technical features and different national provisions of the GO schemes.

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel on this area is currently work in progress.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel on this area is currently work in progress.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

We find this recommendation sufficient.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel on this area is currently work in progress.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel on this area is currently work in progress.

The information on supported/non-supported installations might not be particularly relevant to a consumer making a choice on a green product (see also answer to point 1).

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

Although we agree that the geographical indication on GOs might be of interest to some consumers, there might be implementation/operational issues to consider, in particular for domestic consumers (while it might be easier for large business consumers, who usually have ad hoc contractual terms).

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

The position of Enel on this area is currently work in progress.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

We agree that consumers should have access to all of the necessary information to make a well-informed choice. However, when the consumer is subscribing to an offer, some detailed information might not always be available to the supplier.

General additional comments Please add any relevant comments that are not on a specific GGP here.

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Survey response 21

Contact details and treatment of confidential information

Contact details [Organisation]

Bosch Thermotechnology

Please choose from the options below the level of confidentiality of your answer.

Public, but some sections may be confidential as indicated in individual questions
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I. How to provide access to adequate and reliable information to consumers?

Recommendation 1 (Updated) "All Comparison Tools (CTs) ¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix ² and supplier mix ³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.
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Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.
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Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.
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II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling ¹ . For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.
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This recommendation could help ensure a real European market for renewable energy is created. In addition, the use of GOs as the "only instrument for tracking energy sources in green offers within disclosure systems" can help ensure obligations are met through easily accessible and verifiable tools. In this context, the use of gas or electricity GOs for heating and cooling purposes - whether in district heating and cooling, cogeneration or individual heating systems such as standalone or hybrid boilers, should also be allowed without the need to convert them into a "heating & cooling" GO which could create undue administrative burden. As the only instrument for tracking energy sources, these GOs should also help count towards obligations for suppliers or individual consumers.
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Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

Disclosure and obligations related to the consumption of renewable energy should be closely linked to the discussion surrounding harmonisation of GO systems across the EU. This could be relevant across EPBD obligations, EED, the ETS, or various building regulations across member states.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

This recommendation should not be limited to electricity and instead broadly cover gas, hydrogen, heating and cooling and power.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

This recommendation should not be limited to electricity and instead could broadly cover gas, hydrogen, heating and cooling and power consumption and disclosure to ensure full transparency and adequate mechanisms to fulfil country or sector specific obligations whilst avoiding double counting.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

While this information can be included as information in the guarantee of origin it should not infringe on the possibility to consume energy across the EU; failure to do this would risk dividing the single market and the possibility for a true integration of renewable energy generation and consumption.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

Transparency and clarity in legislation would be key from this respect. What is here discussed as a GO can be understood in EU legislation as a certificate to an extent while the label can be interpreted as GO in the renewable energy directive sense of it. The fundamental first step will be to ensure there is clarity across the EU, across sectors and across legislation.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

General additional comments Please add any relevant comments that are not on a specific GGP here.

Survey response 22

Contact details and treatment of confidential information

Contact details [Organisation]
Eurogas
Please choose from the options below the level of confidentiality of your answer.
Public

I. How to provide access to adequate and reliable information to consumers?

<p>Recommendation 1 (Updated) "All Comparison Tools (CTs)¹ - in particular those operated or trust marked by a public authority or body - should provide a clear indication of the product mix² and supplier mix³ for each product fixed in the comparison tool. If offers are claimed as "green" by CTs (and/or suppliers), the justification for doing so (as a source of information) must be transparent to consumers (no matter whether they consume electricity and/or gas). If feasible, information should be provided to give an account of the share of energy that did not benefit from public support." 1. As defined in Article 14 of Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity. 2. As defined in Article 5 of Annex I of Directive (EU) 2019/944: product level disclosure. 3. As defined in Article 5 of Annex I of Directive (EU) 2019/944: overall energy mix of the supplier. Is this recommendation sufficient? Please share your suggestions and comments.</p>
<p>Eurogas would like to clarify the implication that this recommendation might have on suppliers' obligations. Indeed, it is important to assess to what extent a 'clear indication' of the product and supplier mix for each listed product is realistic. It is impossible for suppliers to guarantee ex-ante the share of each type of energy in the supplier mix (balancing is sometimes required and cannot be determined beforehand). Regarding 'green offers' - in particular information to be provided to give an account of the share of energy that did not benefit from public support - we believe that this information might create a new category of GOs with different values for customers. It would be desirable to leave each Member State the possibility to introduce such obligations in its own market. Lastly, "green" terminology must be restricted to energy issued from renewables production.</p>
<p>Recommendation 2 (updated) "The National Regulatory Authority (NRA) (or other competent body) should cooperate at European level and ensure that there is a harmonised format proposing a minimum standard for displaying information concerning the origin of energy supplied from renewable sources (and if applicable also from non-renewable sources), and should specify the level of detail required for this information and how such information is communicated to consumers." Is this recommendation sufficient? Please share your suggestions and comments.</p>
<p>No further comments.</p>
<p>Recommendation 3 (updated) "References in the energy bill to where additional information on guarantees of origin is available, such as the type of renewable energy source, the geographic origin (country or, if applicable, region), or whether or not it has received support from a renewable investment or production support scheme, should be drawn to customers' attention (e.g. on the website of the supplier and/or of the competent body for disclosure)." Is this recommendation sufficient? Please share your suggestions and comments.</p>
<p>Eurogas fears that the additional information to be included might increase the complexity of GOs, without bringing any additional benefits to customers. In fact:</p> <ol style="list-style-type: none">1. It might be very challenging for suppliers to provide such information from an operational point of view and impossible for the mass market.2. Over-information might create confusion among customers, without bringing them additional benefits (for instance, region of origin vis-à-vis country of origin, public support etc.).

II. How to strengthen consumer trust by improving the existing disclosure systems?

Recommendation 4 (updated) "Member States should have a GO system in place for (i) electricity, (ii) gas, including hydrogen; or (iii) heating or cooling¹. For this purpose, national GO system convergence should be encouraged so that GOs are easily tradable across Member States. When and where available, GOs should be used as the only instrument for tracking energy sources in green offers within disclosure systems, including in the framework of a Power Purchase Agreement (PPA) or any contract with a renewable production plant (e.g. EU Solar Energy). In the absence of a proper GO the offer cannot be marketed as "green". 1. As defined in Article 19 of Directive (EU) 2018/2001 Is this recommendation sufficient? Please share your suggestions and comments.

No further comments.

Recommendation 5 (updated) "GOs should be used as a basis for further harmonisation of disclosure systems. An assessment of the use of GOs in electricity should be done at national and European level to identify improvements which could be made to the existing GO system in electricity as well as best practices to convey to (i) gas, including hydrogen; or (ii) heating or cooling. Good practices identified in electricity disclosure system should be extended to other energy disclosure systems. The cooperation of competent authorities for disclosure should be enhanced irrespective of the form of energy disclosed. This should be facilitated with the use of a common platform." Is this recommendation sufficient? Please share your suggestions and comments.

Eurogas believes that gathering information on GOs – for example from both gas and electricity – in one single platform might be unworkable. Given the numerous differences existing among the systems, the relevant platforms should be maintained separated. On the first paragraph of this recommendation, we would recommend clarifying which entity should be in charge of the assessment of the use of GOs.

Recommendation 6 (original) "Further harmonisation of the existing disclosure systems on a European level should make the systems more reliable and efficient. The competent body for disclosure should ensure that the utmost is done to make customers aware of the information that is provided to them regarding the electricity with which they are supplied. To foster trust in the system, customers should easily be able to find clear information about the functioning of the disclosure system. The publication of an annual disclosure report by the relevant competent body is a good practice that can further increase transparency in terms of the origin of supplied electricity at the national level." Is this recommendation sufficient? Please share your suggestions and comments.

No further comments.

Recommendation 7 (updated) "In order to make the disclosure information for customers more coherent, efficient and reliable, it is worth considering whether the issuing of GOs should be extended to all sources of electricity. Full disclosure, meaning the cancellation of GOs for all consumption, would help to make the disclosure system more consistent and reliable, as well as to provide opportunities for marketing electricity products based on specific non-renewable sources in a trustworthy manner. A single, coherent and properly designed system addressing all electricity generation, from all sources, has the potential of reducing administrative burdens and costs. In order to avoid imposing an administrative burden and costs on electricity producers, it could, as a first step, be introduced on a voluntary basis. Where full disclosure is not possible, a residual mix should be determined at national level. The methodology to calculate the residual mix should be harmonised across all participating countries in the interconnected energy market, per energy carrier." Is this recommendation sufficient? Please share your suggestions and comments.

Eurogas agrees with the updated recommendation. However, we recommend underlying that the disclosure should always remain optional.

Recommendation 8 (updated) "The further integration of gas and electricity markets at European level should be accompanied by actively continuing the development of the European GO market, thus increasing price transparency and competition. Price information for products that include energy from supported and non-supported installations should be shared publicly and be easily accessible." Is this recommendation sufficient? Please share your suggestions and comments.

Regarding the updated recommendation number 8, Eurogas would like to emphasize that suppliers cannot publish OTC prices, while only bidding prices might be shared publicly. In addition, we remain doubtful of the added value in sharing information relating to supported/non-supported installations with consumers.

III. How to provide consumers with transparent information?

Recommendation 9 (new) "Consumers should be able to choose "local or regional" GOs, i.e. issued for local energy production close to the consumer's consumption point." Is this recommendation sufficient? Please share your suggestions and comments.

Eurogas does not believe that recommendation number 9 should be included in the list. The GO system works at EU level, whilst there is little to no added value in creating local or regional GOs. We acknowledge that specific business models may require a greater set of information related to the GOs, but we generally believe it is preferable to avoid the proliferation of different types of GOs.

Recommendation 10 (updated) "GOs and labels should be considered as two complementary mechanisms. Guarantee of Origin is the legal and technical mechanism to guarantee the source of energy, whereas labels should be considered as a communication tool to ease consumers' understanding of the energy market. Labels can be considered as creating added value for more demanding customers, if it can be guaranteed that the additional impact is associated with the contract (such as direct investment of funds in new renewable generation capacity or reductions of CO2 emissions). An excessive number of labels might be confusing for consumers and potentially raise trust issues, if the information provided by these labels is inconsistent. On the supplier side, it would render it difficult for smaller suppliers to be active in every labelling system, especially when fees are charged. Labels should be encouraged to use GOs as their sole tracking mechanism, in order to ensure reliability and electricity and gas customer's trust." Is this recommendation sufficient? Please share your suggestions and comments.

Eurogas agrees with the updated recommendation. However, a clearer distinction between GOs and labels should be foreseen.

Recommendation 11 (new) "When subscribing to an offer claimed as "green" by a supplier, the supplier should provide all necessary information to enable the consumer to verify the accuracy of the offer to which they subscribed." Is this recommendation sufficient? Please share your suggestions and comments.

The verification of the accuracy of information should be left to Member States or any other relevant national authority. "Green" terminology must be restricted to energy issued from renewables production.

General additional comments Please add any relevant comments that are not on a specific GGP here.