

[Please fill in Country]	Electricity	Natural Gas including (bio)methane	Hydrogen	Other Gas	Heating/Cooling	Space for comments	
	[Author]	[Author]	[Author]	[Author]	Germany		
	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS		Instructions for assessment/explanations
	[Please fill in date on which you filled in]	[Please fill in date on which you filled in]	[Please fill in date on which you filled in]	[Please fill in date on which you filled in]	12/03/2024		

General							
Does your member state have a disclosure obligation for origin of supplied/comsumed energy?	Yes	No	No		Yes	lack of law so far	Yes/No
- If yes, To which economic operators does it apply?	for electricity suppliers				heating who are obliged to show the share of renewables		Please specify (categories like: regulated suppliers, corporate consumers, all, ...)
- If yes, Under what rules it is governed?	§ 42 EnWG				https://www.gesetze-im-internet.de/ffvav/BjNR4591100		Please name the relevant regulations and provide a reference (preferably a version in English)
When did the regulation(s) regarding disclosure initially come into force?	2008	not applicable	not applicable	not applicable	2023-01-04		Please name the date in which the regulation(s) initially came into force. Date format: YYYY-MM-DD
When was the last revision of the disclosure regulation(s)	on improvements. Latest revision of 1.1.2023 was	not applicable	not applicable	not applicable	none yet		Please name the date of the last revision of the disclosure regulation(s)
who is the Competent Body in charge for the supervision of disclosure?	Bundesnetzagentur, UBA for the RES-part	not applicable	not applicable	not applicable	none yet	due to lack of regulation	Please specify name
- Since when are they in charge of supervision of disclosure?	Bundesnetzagentur, since 2023 UBA responsible for	not applicable	not applicable	not applicable	-		Please specify date
- Under which legal nomination (law/decree/decision) are they appointed as competent body?	§§35 Abs. 1 Nr. 9; 42 Abs. 7 EnWG	not applicable	not applicable	not applicable	-	Rechtsgrundlage ?	Provide reference to legal nomination
Are GOs the only instrument for disclosing known origin in disclosure statements to final customers?	No	Not applicable	Not applicable	Not applicable	No	No corresponding legislation currently in force	Yes/No
- If no, please specify the other instruments	electricity supply contracts				https://www.agfw.de/technik-		Please specify
Which measures are in place for supervision of suppliers regarding their disclosure of the origin of the gas of their supply?		not applicable	not applicable	not applicable			Gas only, please describe
Do suppliers submit samples of their invoices to the disclosure supervisor?	No	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No. Disclosure supervisor for electricity : the authority supervising the obligation on suppliers to inform their clients about their supplier mix and product mix according to Electricity Directive 2019/944, Annex I, Article 5 Disclosure of energy sources.
- If yes, how often?					-		Please specify frequency
Is there a public report on the result of the disclosure supervision?	No	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No
- If yes, where can it be found?					-		Please specify
If a supplier is active in multiple Member States: does the supplier mix in your country/region account for this?	No	Not applicable	Not applicable	Not applicable	-		Yes/No
- If yes: how does this influence the supplier mix in your country/region?					-		Please specify

Implementation of Article 19 (8) of the Directive 2018/2001 and amended with 2023/2413							
Have you fully implemented the requirements of Art. 19 (8) of Directive 2018/2001(EU) amended with 2023/2413(EU)	Yes	Not yet	Not yet	Not yet	Not applicable	Unclear what is meant with "fully" implemented.	Yes/No
- If not, please specify which elements you have not implemented yet.					Adjustment of the residual mix is not yet in		Please specify

Unit of energy represented by a GO							
Is the unit of a GO MWh?	Yes	Not sure, see comment	Not sure, see comment	Not sure, see comment	Yes	heating/cooling: the relevant legislation is not yet in force but the answer is most likely yes	Yes/No
Do you use smaller units than MWh for GOs?	No	Not applicable	Not applicable	Not applicable	Not yet		Yes/No
Is the standard size for smaller size GOs equal to 1 Wh?	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No
- If no: please specify					-		please specify
Do you differentiate the different units in the disclosure statements? Please explain your methodology	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No, please specify

Do GOs that have not been cancelled expire at the latest 18 months after the production of the energy unit?	Yes	Not sure, see comment	Not sure, see comment	Not sure, see comment	yes	see comment 59	Yes/No
- If no, please specify							Please specify
Are expired GOs collected into the Residual Mix (by fulfilling the statistic requirements of AIB)?	Yes	Not sure, see comment	Not sure, see comment	Not sure, see comment	Not yet	due to lack of regulation	Yes/No
- If no, please specify							Please specify
Do the cancelled GOs for disclosure in year X+1 refer to the production of year X?	Yes	Not sure, see comment	Not sure, see comment	Not sure, see comment	Not sure, see comment	see comment 63	Yes/No (No meaning: no GOs from previous or future production years can be used for the disclosure period)
- If no, please specify the handling							Please specify
When is the deadline for disclosure?	01.11.	Not applicable	Not applicable	Not applicable	none yet		please specify; ex. 31 March Year X+1

Usage ex-domain cancellations

Do you issue your GOs under the European Energy Certificate System (EECS) of AIB?	Yes	Not sure, see comment	Not sure, see comment	Not sure, see comment	No	we are planning to do so	Yes/No
Do you allow for ex-domain cancellations, which means cancelling a GO in your registry for the usage in another registry?	No	Not sure, see comment	Not sure, see comment	Not sure, see comment	No	under discussion	Yes/No
- If yes, please describe under which conditions?							please describe
- If yes, are ex-domain cancellations reported to the AIB for statistical purposes?							Yes/No
How do you ensure that GOs, cancelled for another domain, are not also claimed for consumption in your own domain?	UBA compares the volume of cancelled GOs per supplier with the statement how much	not done yet	not done yet	not done yet	not done yet		please describe

Introduction of full disclosure and purposes of the GO

Have you implemented a full disclosure system in your country?	No	No	No	No	Yes	will be implemented on available	Yes/No
- If yes, since when?							Date
Do GOs have a function in terms of target compliance and are used as support instrument?	Not sure, see comment	No	No	No	no	for electricity: no target for the whole country or sector by law. But secondary use of GOs in	Yes/ No (in case all GOs are linked to disclosure)
Is a GO the only "tracking certificate" used?	No	Not sure, see comment	Not sure, see comment	Not sure, see comment	no	legislation	Yes/No
- If no: Are any other tracking systems of a similar purpose and function as GO closely coordinated with GO?	Yes				No		
- If no: please name the other organisations active in the market (voluntary schemes/non governmental bodies/private initiatives), their role and the task they perform.	contract based tracking				Primary energy factor, agfw, umbrella organisation for district heating		Please specify
Besides GO, is there only the Residual Mix available for usage for disclosure?	No	Not applicable	Not applicable	Not applicable	No		Yes/No (No meaning there are other tracking mechanisms accepted)
- If no, please specify	there is an 1) electricity supplier mix containing the				PEF, see above		Please specify
Are GOs issued for self-consumed energy?	No	Not sure yet, see comment	Not sure yet, see comment	Not sure, see comment	yes	question is subject of ongoing legislative work	Yes/No
- If yes: what are the rules on disclosure for such GOs?					cancellation upon issuance, disclosure onle at self		Please specify

Recognition of GOs from other countries

Do you have criteria in place for accepting foreign GO for disclosure?	Yes	Not yet	Not yet	Not yet	yes		Yes/No
- If yes: Since when are these criteria in place?	2013				not yet		Please specify
- If yes: Are the criteria transparently published in your country?	Yes, on the website HKNR.de				not yet		Please specify and indicate where those are published. If electronically please provide a link.
Are the conditions for the recognition of GOs from other countries based on Art. 19 of Directive 2018/2001/EC and 2023/2413/EC or compatible national legislation?	Yes	Not yet	Not yet	Not yet	Yes		Yes/No

Do you recognise GOs from other countries that have not implemented a disclosure system?	No	Not sure, see comment	Not sure, see comment	Not sure, see comment	No	question is subject of ongoing legislative work	Yes/No
Do you recognise GOs from other countries that have not implemented appropriate measures to effectively avoid double counting of GOs?	Not sure, see comment	Not sure, see comment	Not sure, see comment	Not sure, see comment	No	question is subject of ongoing legislative work, but most likely No	Yes/No
Do you accept imported GOs for disclosure from all EU member states and other members of the European Economic Area (EEA)?	No	Not sure, see comment	Not sure, see comment	Not sure, see comment	Not yet	see comment 94	Yes/No
- If no, please name the countries from which you do not accept imported GOs for disclosure	not applicable, see comment					subject to check case by case	Please specify
- If yes, please specify the reasoning for accepting							Please specify
Do you accept imported GOs from parties to the Energy Community Treaty?	No	Not sure, see comment	Not sure, see comment	Not sure, see comment	No	question is subject of ongoing legislative work, but most likely No	Yes/No
- If yes, please name the countries from which you do import							Please specify
- If yes, please specify the reasoning for accepting							Please specify
Do you accept for disclosure imported GOs from other countries than EU and EEA?	No	Not sure, see comment	Not sure, see comment	Not sure, see comment	No	see comment 98	Yes/No. This question is merely oriented towards countries from EU and EEA, but others are welcome to fill in
- If yes, since when?							Please specify
- If yes, please name the countries from which you accept imported GOs for disclosure							Please specify
- If yes, please specify the reasoning for accepting							Please specify
Does the Domain treat imported GO as national GO when it comes to disclosure?	Yes	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No
- If no, please specify						disclosure can only be possible grid based. Meaning that only	Please specify
Does the customer get information on the country of origin of the GOs in the disclosure statement?	yes	Not applicable	Not applicable	Not applicable	yes, only german issued gos will be allowed for disclosure		Yes, please specify where and how/No

Information on Environmental Parameters							
Does the supplier mix include information on environmental impacts?	Yes	Not applicable	Not applicable	Not applicable	Yes		Yes/No. Note the legal requirement for such information for electricity : Electricity Directive 2019/944, Annex I, Article 5(b)
Please indicate the data source for disclosing environmental information with the supplier mix?	umbrella organisation - BDEW	Not applicable	Not applicable	Not applicable	district heating grid operators		Please describe how it is done in the Domain
Is there information on the guarantee of origin issued in your domain about meeting sustainability criteria and emission savings?	no	not sure see comment	not sure see comment	not sure see comment	optional	Subject of ongoing work on legislation - probably optional	
- If yes, in segments where compliance with sustainability and emission saving criteria is required (e.g. transport or heating), do you require that the supply (consumption) in this segment is confirmed by a GO?							
- If not, how is such consumption demonstrated and how is it reflected in the residual mix?	it is always zero						
How do you treat sustainability information in disclosure statements?	don't understand the question	Not applicable	Not applicable	Not applicable	-	?	please describe

Information on Disclosure communication							
Is the annual disclosure of the supplier mix displayed on the energy bill?	Yes	Not sure, see comment	Not sure, see comment	Not sure, see comment	No	no overview of possibly existing applications on the market	Yes/No
- If no, please specify where it is displayed.					displayed as a PEF of the grid		Please describe
Is disclosure information of different suppliers centrally available (e.g. reports) ?	no	Not sure, see comment	Not sure, see comment	not sure, see comment		see comment 118	Pls. Provide short explanation plus reference to website/regulation.

If not, how is such consumption demonstrated and how is it reflected in the residual mix?	on the electricity bill, it's not in the residual mix, only consumptions without knowing their origin are in the residual mix	Not sure, see comment	Not sure, see comment	Not sure, see comment		see comment 118	
Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.	no	Not applicable	Not applicable	Not applicable			<i>Pls. Provide short explanation plus reference to website/regulation.</i>

Regulations on Power Purchase Agreements (PPAs)

In terms of disclosure, how do you treat energy that is bought in a competitive setting or in a long-term power purchase agreement?	for PPAs there are the same rules	Not applicable	Not applicable	Not applicable	-		<i>Please describe</i>
Who is responsible for disclosing/cancelling the GOs for competitive settings or long-term purchase agreements?	the plant operator= the electricity supplier	Not applicable	Not applicable	Not applicable	-		<i>supplier/plant operator/customer? Please specify</i>

Energy Storage

Can storage prolong the lifetime of a GO for more than 12 month after the production of the energy unit?	No	not sure see comment	not sure see comment	not sure see comment	no	subject of ongoing legislative work	<i>Please describe</i>
Does your system facilitate "Storage Issuance" (= cancel GOs for the input into storage and issue GOs for the storage output, with new production period?)	No	Not sure, see comment	Not sure, see comment	Not sure, see comment	no	see comment 132	<i>Yes/No</i>
- If yes, do you provide separate cancellation statistics for energy that goes into storage?							<i>Please describe</i>
- If yes, do GO issuance statistics have a separate category for energy released from storage?							<i>Please describe</i>

Other Reliable Tracking Systems (RTS)

Next to GOs, do you also allow other RTS as basis for Disclosure? (ex. Contract based tracking, Residual Mix, tradeable Proofs of Sustainability (PoS), etc)	Yes	Not sure, see comment	Not sure, see comment	Not sure, see comment	no	subject of ongoing legislative work	<i>Yes/No</i>
- If yes, please describe	Contract based tracking, residual mix						<i>Please describe</i>
- If yes, are they treated in a way that is legally separated from GOs?	yes						<i>Please describe</i>
How do Proofs of Sustainability interact with the GO system?	No PoS for electricity	POs and GO will most likely be connected use of POS = Cancellation of GO, no cancellation of GO as long	POs and GO will most likely be connected use of POS = Cancellation of GO, no cancellation of GO as long	POs and GO will most likely be connected use of POS = Cancellation of GO, no cancellation of GO as long	-		<i>Please describe</i>
What measures prevent that a Proof of Sustainability is allocated to a different consumer than the GO that was issued for the same energy? (Double disclosure)	No PoS for electricity				-		<i>Please describe</i>
Do you prohibit statistical data to be used for determining the energy sources of energy obtained from exchanges?	no	Not applicable	Not applicable	Not applicable			<i>Yes/No</i>
- If no, under what circumstances do you allow statistical data to be used for determining the energy source of energy from an exchange?	entso e is to be used in cases of electricity from exchanges						<i>Please describe</i>
Do you prohibit statistical data to be used for determining the energy sources of imported energy?	Not applicable	Not applicable	Not applicable	Not applicable			<i>Yes/No</i>
- If no, under what circumstances do you allow statistical data to be used for determining the energy source of imported energy?							<i>Please describe</i>

Data sources

What is the data source for production data?	plant operators provide us with the	not clear yet	not clear yet	not clear yet	not clear yet		<i>Please specify</i>
- If possible, link to data source	https://www.bdew.de/media/documents/230807						<i>Please specify the website for the data source and which party is in charge</i>
When are the statistics based on production measurement data available for calendar year X?	in the spring/summer x+1	not clear yet	not clear yet	not clear yet	not clear yet		<i>Please specify</i>
Is production data available with (sub)hourly granularity?	Yes	Not sure, see comment	Not sure, see comment	Not sure, see comment	Not sure, see comment	Some plants provide	<i>Yes/No</i>

- If yes, which production categories?					may be available		Please specify
- If yes, what is the granularity of the data?	15 minutes, only for PDs with EDIFACT communication						10mins/15mins/20mins/...
- If yes, how long after the production period is the data available?							Please specify
What is the data source for consumption data?	we have access to data on delivered electricity per supplier per year. We don't have data for every supplier. There is data in a yearly survey.	not clear yet	not clear yet	not clear yet	not clear yet		Please specify
- If possible, link to data source							Please specify the link to the data source
When are the statistics based on consumption measurement consumption data available for the calendar year X?	Delivery data is available in spring 2 years after the delivery year.	not clear yet	not clear yet	not clear yet	not clear yet		Please specify
Is hourly consumption data available?	No	Not applicable	Not applicable	Not applicable			Yes/No
- If yes, for which consumption categories?							Please specify
- If yes, what is the granularity of the data?							10mins/15mins/20mins/...
- If yes, how long after the consumption period is the data available?							Please specify
Who is in charge of collecting statistics for Proofs of Sustainability (PoS) issued in your Domain?	Not applicable	not clear yet, see comment	not clear yet, see comment	not clear yet, see comment	-	Regarding RFNBO it will be UBA, but legislation is not completely in force yet	Please name the organisation in charge
When are the data for the PoS made available?	Not applicable	not clear yet	not clear yet	not clear yet	-		Please specify
Is it possible to issue a PoS and a GO for the same energy production?	Not applicable	most likely yes, at least law regarding POS describes the case	most likely yes, at least law regarding POS describes the case	most likely yes, at least law regarding POS describes the case	-		Yes/No
- If no, how is this ensured that only one of the two instruments is provided to a producer?							Please specify
- If yes, can the PoS be allocated to a different consumer than the consumer for whom the GO is cancelled?							Please specify
- If only a PoS can be issued, how will you ensure that the new obligation for gas suppliers under RED III Article 19(8) is fulfilled?							
How does a GO interact with a PoS, please describe the process/cooperation	There is no interaction.	not completely clear yet and please see 142	not completely clear yet and please see 142	not completely clear yet and please see 142	-		Please specify

Timeline of disclosure

When is the residual mix communicated to suppliers?	in summer of the year x+1	not clear yet	not clear yet	not clear yet	not clear yet		Indicate approximate timing every year
When do suppliers provide disclosure figures (product mixes) to the disclosure authority?	in spring of the year x+2	not clear yet	not clear yet	not clear yet	not clear yet		Indicate approximate timing every year
When does the disclosure authority validate and publish the disclosure figures: product mixes, supplier mixes, other disclosure mixes (if applicable)?	UBA validates disclosure statements in year x+2. UBA only checks supplier mix. UBA doesn't publish disclosure figures. Report about validation is internal.	not clear yet	not clear yet	not clear yet	not clear yet		Indicate approximate timing every year
When do the suppliers inform their clients about the disclosure figures?	10 months after the electricity delivery year (1st November of year x+1)				not clear yet		Indicate approximate timing every year. E.g., is it by the 1st September of year X+1 for disclosure figures of year X or another deadline?

GO usage per system boundary

Do you have rules in place that restrict the usage of GOs to a certain system boundary? <i>- If yes, please specify</i>	No, there are no geographic restrictions/restrictions to certain grid for electricity GOs.	not clear yet	not clear yet	not clear yet	yes, only gos for heating can be used in a district heating grid, cooling vice versa. Unclear: what is heating what is cooling, dual use grids are a thing		Yes/No (E.g. are there restrictions for where to use electricity GOs? Can hydrogen GOs be used for consumption from the natural gas grid? Can biomethane GOs be used for consumption from a hydrogen grid? Any specifics on vehicle transported gases? Restrictions on where heating and cooling GOs can be used? e.g. can heating and cooling GOs be exported? can they be used on another heating grid than where they were produced? etc)
For Gas GOs, what defines the Network Characteristics for which a certain Gas GO may be cancelled, in line with REDIII art. 19.8?		not clear yet	not clear yet	not clear yet			Please specify
Will you allow cancellation of methane GOs for consumption in a Hydrogen System?		no	no	no			Please specify
Will you allow cancellation of Hydrogen GOs for consumption in a Natural Gas System?		not clear yet	not clear yet	not clear yet			Please specify
Which GOs are allowed for consumption of vehicle transported gases?		not clear yet	not clear yet	not clear yet			Please specify
Which GO usage restrictions apply in relation with the Dissemination Level for which the GO is issued?	not clear yet	not clear yet	not clear yet	not clear yet	gos issued for self consumption have to be cancelled by the consumer	question is to be discussed	(see EECS Fact Sheet 20 for values of Dissemination Level on GOs - Expected to be also in CEN EN16325 annex E)
Does your member state publicly provide GO cancellation statistics per consumption category? <i>- If yes, into which consumption categories are statistics divided?</i>	No We don't differentiate consumption categories.	Not sure, see comment	Not sure, see comment	Not sure, see comment	not yet	question is to be discussed	Yes/No (e.g. cancellation for final consumption / for energy carrier conversion / for input into energy storage / for transition into another certification scheme)
Does your member state provide GO cancellation statistics for energy that changes dissemination level during its chain of custody?	No	Not sure, see comment	Not sure, see comment	Not sure, see comment	not yet	see comment 187	Yes/No
Do you distinguish different types of GO cancellations: cancellations for final energy consumption vs. GO cancellation for input into energy carrier conversion, for storage, for transitioning into another certification mechanism or other?	No, only GO cancellation type is energy consumption	Not yet	Not yet	Not yet	not yet	Do you also mean purpose of disclosure?	Yes/No/Please specify
Does your member state provide statistics on GOs that are cancelled for input into energy carrier conversion (= for GO Conversion Issuance)?	Not yet	Not yet	Not yet	Not yet	not yet		Yes/No
Link to the detailed cancellation statistics	No. Available in AIB statistics.						weblink

Supervision on Disclosure obligation

What measures are in place for supervision of suppliers regarding their disclosure of the origin of the gas of their supply?	not applicable - only gas mentioned	not applicable yet	not applicable yet	not applicable yet	none yet		Please describe
Is there a public report on the result of the disclosure supervision? <i>- If yes, where can it be found?</i>	No	No	No	No	No		Yes/No Please specify

Union Database (UDB) and disclosure supervision

Will a link between GO Registry and UDB be provided in your domain? <i>- If yes: which institution/authority will provide this?</i>		Not yet	Not yet	Not yet			Yes/No
Will the Disclosure Competent Body have access to the UDB?		Not applicable	Not applicable	Not applicable			
What mechanism is in place for the interaction between the GO registry and the UDB? <i>- If none yet, what ideas or plans are there regarding the future for this interaction between GOs and UDB?</i>		Not yet	Not yet	Not yet			Please describe
Is data from the Union Database for sustainable biofuels checked to confirm the location of renewable energy consumption?		not clear yet	not clear yet	not clear yet			Please describe

- If yes, please describe the principles of this check							
Is a consistency check done regarding information in the UDB and the beneficiary of cancelled GOs for the same gas?		not yet	not yet	not yet			Please describe

Member States reporting to EC on GO statistics and renewable energy consumption

Which principles do you use to report GO statistics and renewable energy consumption in annex XVI of the implementing Act C(2022) 8251?	reporting production based issuing and cancellation figures, electricity GOs only (RES, RES HEC), Formula (3) customised for Germany	none yet	none yet	none yet	-	Link is not working	annex XVI of the implementing Act C(2022) 825
Do the reported figures differ from your published GO statistics?	Not sure, see comment	Not applicable	Not applicable	Not applicable		The question can only be addressed in terms of a specific reporting year. What is meant by the published GO statistics: Monthly figures reported to the AIB?	Yes/No
- If yes, how do they differ?							Please describe
Do the reported figures differ from the reported consumption data for the annual residual mix exercise?	Not sure, see comment	Not applicable	Not applicable	Not applicable		The question can only be addressed in terms of a specific reporting year. What is meant by the reported consumption data: Monthly figures reported to the AIB?	Yes/No
- If yes, how do they differ?							Please describe

Suggestion on Improvement

Which improvement suggestions do you have regarding the residual mix calculation method?	Compare the GO and residual mix imports/exports with physical flows of energy mixes in the European grid. What does the residual mix of a member state say about demand for RE and the use of location-based and market-based disclosure in that state. Publish an accessible report answering these questions as an annex to the residual mix statistic each year.					Shorten the report. More specific questions.	Please describe
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<p>Which improvement suggestions do you have regarding this questionnaire?</p>	<p>An evaluation of the first GO data reports of the AIB members to EC should be done differently. In order to capture general differences, the question 209 should be concretised and differentiated according to reporting elements. Questions 210, 212 are too vague to be able to derive much from the answers.</p>	<p>In case of gas it should be a living document. We had to answer most of the questions using "not applicable" or "not sure..." This is due to the currently unfinished legislative work. There are a few questions which could be answered with high probability, but this is not sufficient for this data sheet. I'm happy to improve in due course</p>			<p>Very good questionnaire. Many things to discuss within the process of adoption of the Registry</p>		<p><i>Please describe</i></p>
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