

15 July 2022

EFET response to Enagas consultation on Guarantees of Origin (GoOs) management procedure

[Enagas consulta publica sobre el Procedimiento de Gestión del Sistema de Garantías de Origen \(GdO\)](#) seeks to implement [Directive \(EU\) 2018/2001 \(RED II\)](#) establishing that, for the purposes of disclosure of the origin of renewable energy to end consumers, Guarantees of Origin (GoOs) for all renewable energy sources according to the definition of renewable energy of article 2, including biomethane and hydrogen produced by electrolysis, must be compliant with the CEN – EN 16325 standard.

The latter is currently under revision for the development of an upgraded generic GoOs standard with separate sections for electricity and gas, including hydrogen, heating and cooling.

Key messages

1. Ensure cross-border harmonisation of national certification systems for renewable and low-carbon gases
2. Evaluate the optional inclusion of sustainability criteria in the GoOs system
3. Improve the term and conditions of the GoOs system
4. Participation contract in the GoOs system should undergo a public consultation process

Detailed messages

Ensure cross-border harmonisation of national certification systems for renewable and low-carbon gases

Certification systems introduced at the national level should operationally be in an as common format as possible, at least per commodity and per quality, irrespective of the end-use sector. A single instrument should emerge that has a value that can be traded in any market and that contains the information necessary for this purpose, in order for markets to eventually converge.

A prospective common scheme that can operate across gases that are going to be conveyed in the same networks may ensure a common framework so that national quotas and national certificate schemes implemented for biogases and low-carbon gases should not pose risks to cross-border trading. Purely national quotas and certificate schemes which are mutually redeemable between a limited number of Member States bear the risk of restricting EU-wide trade in the underlying commodity.

Evaluate the optional inclusion of sustainability criteria in the GoOs system

We understand that inclusion in the CEN – EN 16325 standard of sustainability criteria, as laid down in Article 29(2) to (7) and (10) of RED II, remains optional.

Hence, we encourage Enagas to assess the possibility of enabling the optional inclusion of the sustainability criteria in the Spanish GoOs system. The optionality of this inclusion is critical given that the operational design of the Union Database currently seems to be based on RED II.

For this reason, the link between the GoOs and the Proof of Sustainability (PoS) certificate is allowed, and inclusion would avoid further market fragmentation and higher simplicity for RES gas consumers.

Improve the term and conditions of the GoOs system

- Including explicitly the figure of “Traders” as eligible GoOs holders
- Ensuring that the status and transaction code attributes of a GoOs are automatically updated in the platform when transferred to other holders in order to
 - enable an efficient operability of the platform;
 - enable constantly updated information on GoOs across all transactions;
 - avoid unnecessary administrative burdens to GoOs holders
- Enabling the cancellation by CUPS (Unified Code of Supplying Point) not only for day and intraday metered consumptions, but also for non-daily metered consumptions (equivalent to GoOs for electricity)
- Enabling agents to hold different account types (e.g. enable suppliers to have the same GoOs functionalities when acting as producer and consumer) to grant greater functionalities and greater compatibility of the GoO scheme
- Defining rules applicable to GoOs granted to bunkering activities
- Validating GoOs Audits with Sustainability Certification Audits (in the case of existence) under Chapter 4 in order to save time and administrative costs for producers, suppliers and consumers

Participation contract in the GoOs system should undergo a public consultation process

As stated in Section 2.3.2, market participants are required to sign a participation contract in order to access the GoOs system. This contract, as well as the future modifications, should be subject to an open consultation procedure.