

Selected options for implementation of "front side" disclosure aspects

Background information and consultation

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www.reliable-disclosure.org

Please provide any response by **7th May 2014** to **d.seebach@oeko.de**



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Purpose of this document

- The aim of this document is twofold:
 - to provide an **overview** to competent bodies and interested stakeholders **on different options to implement specific aspects of electricity disclosure** based on existing examples; and
 - to **gain feedback** from competent bodies and stakeholders on their preferences and views about implementation of specific aspects of electricity disclosure; *pls. note that for the purpose of provision of responses a **separate Excel form** is provided by RE-DISS together with this background document*
- The latest work of RE-DISS, and more specifically the RE-DISS Best Practice Recommendations document, has focussed particularly on tracking of information and therefore the definition of which figures should be disclosed (“back side” of disclosure). The initiative at hand aims at analysing further aspects of disclosure, particularly how this information shall be presented to end consumers (the “front side” of disclosure).
- The description of different options for implementing various disclosure aspects in this document should be understood as illustration of different possibilities which are considered interesting by the RE-DISS team; it shall be stressed that these should not be understood as recommendations by the RE-DISS team for such an approach.
- Examples on status quo implementation are based on knowledge and experience of the RE-DISS project team. This is particularly based on the latest update of country profiles for the EU28+CH+IS+NO, which is currently being finalised.
- Based on responses provided during this consultation the RE-DISS project team will elaborate two different sets of disclosure guidelines (focussing on the “front side” aspect): one focussing on competent bodies, one addressing electricity suppliers.

Overview

- Selection of the aspects covered by this document has not been made in order to cover all fundamental (or also most relevant) issues, but several aspects which are not clearly defined by the IEM Directive, and for which the diverging implementation around European countries or existing discussion lines suggested the value of comprehensive best practice recommendations focussing on front side disclosure.
- We are aware that there is an overlap with the consultation as conducted by CEER early 2014. We apologise for any inconveniences on your side, but still ask you to provide feedback in case you have a specific view. This should help to increase the quality of the future RE-DISS disclosure guidelines, which have a different scope than the CEER Green Offers' Guidelines and are therefore still needed and added value.
- The following issues of electricity disclosure are covered by this consultation:

Additional parameters

- Shares of supported (RES) electricity
- Country of origin
- Detailed fuels / technologies
- Further environmental indicators
- Additionality aspects
- Distinction of tracking mechanisms

Presentation of information

- Standard format for disclosure
- Provision of comparison values
- Evaluative presentation
- Central national information platform

Further aspects

- Regulatory oversight and verification

How can you respond to this consultation?

Response format:

- Responses to this consultation should be submitted to the RE-DISS project team by filling out the **Excel questionnaire** which is provided together with this background document.
- Please provide your opinions and preferences for the different discussed options (your "wish list"); the consultation is NOT aiming at assessing the status quo of implementation
- Please send this Excel spreadsheet via e-mail by **7th May 2014** to Dominik Seebach (d.seebach@oeko.de), RE-DISS II project coordinator

Confidentiality and interpretation of answers:

- A summary of the received responses and information on who provided responses will be published by RE-DISS after the consultation.
 - In case you would like to provide a **confidential response**, please indicate this in the Excel spreadsheet mentioned above. In this case no information about your person and no attributable information about your organisation (incl. company specific data or information provided within the responses) will be published.

Additional information:

- In case you are aware of recent research or relevant publications related to the topics covered by this consultation paper (e.g. on your national level), please provide a reference to this together with your response.

Outlook / Time plan

Based on feedback from Competent Bodies and stakeholders the RE-DISS project team will work on elaborating **two different sets of disclosure guidelines** (focussing on the “front side” aspect):

- Guidelines for Competent Bodies on how to implement and supervise disclosure regulations
- Guidelines for electricity suppliers and other market participants how to disclose their fuel mix in an ideal case (taking into account that national regulations might differ between countries)

Detailed timeplan

- 7th May 2014: closing date for initial consultation
- June 2014: first draft for disclosure guidelines by the RE-DISS project team
- Commenting by Competent Bodies by writing or during the Domain Workshop (24/25 June 2014, Brussels)
- Commenting by NGOs and market stakeholders in writing
- Publication of final guidelines in July 2014
- Presentation and discussion of final guidelines for market stakeholders in a workshop or webinar planned for September 2014

1) SPECIFIC FIELDS OF INTEREST FOR RECOMMENDATIONS ON DISCLOSURE RELATING TO DISCLOSURE OF ADDITIONAL PARAMETERS

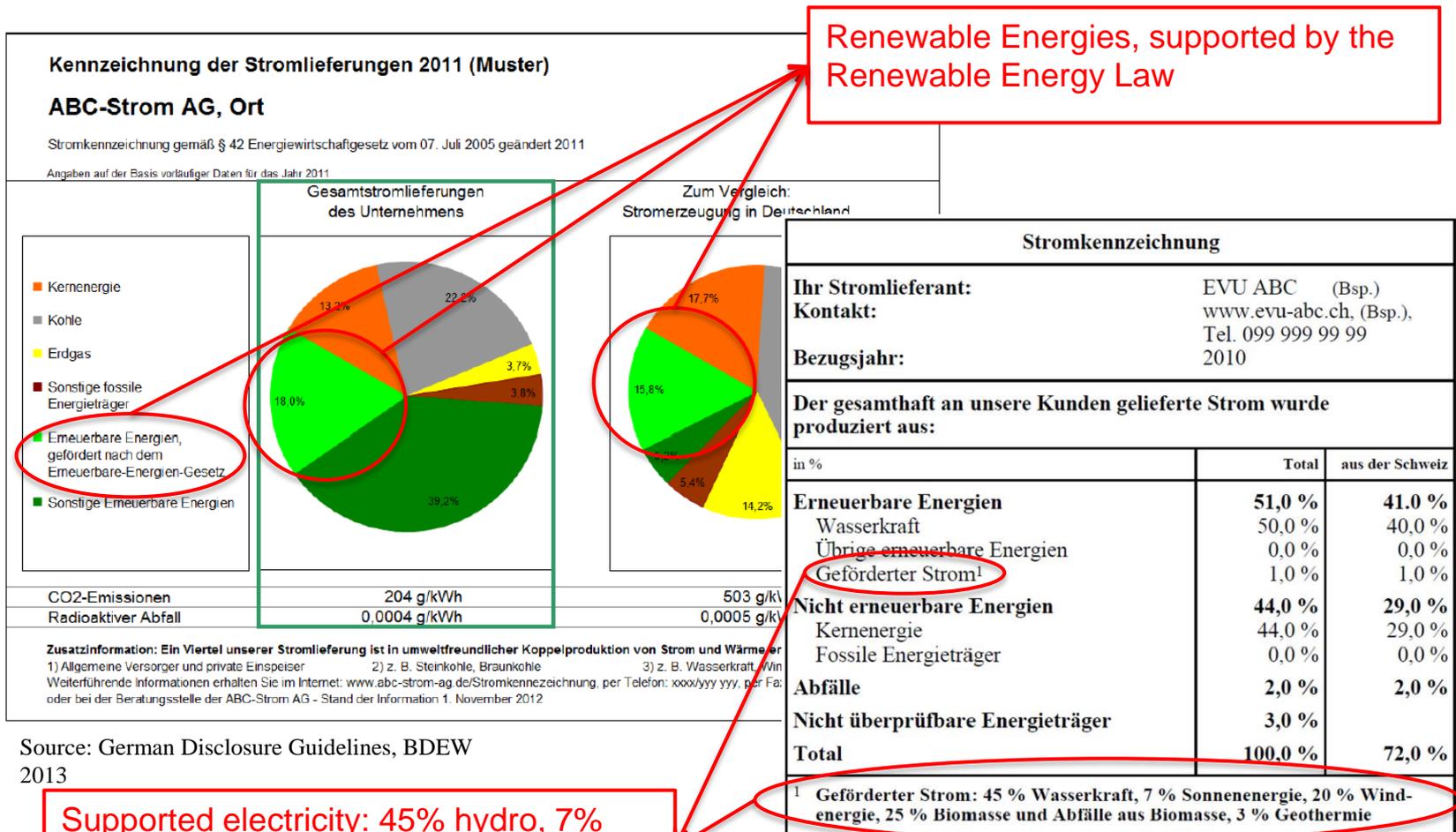
1) Disclosure of additional parameters

1.1) Shares of supported electricity: Options for implementation

- Switzerland and Germany disclose shares of pro-rata allocated RES-E deriving from the national support schemes explicitly as "supported RES". Such pro-rata allocation follows the reasoning that those consumers should get the green attributes who pay the major share of it. For the Swiss and German example the distinct disclosure thus shows which RES shares have been assigned due to regulatory provisions in contrast to those RES shares which have been actively produced or purchased by the supplier.
- In principle, it would also be possible to generally differentiate in disclosure between supported and non-supported RES (irrespective of whether this is domestic or imported production and support), as this information has to be included on RES GOs anyway.
 - This would mean that "RES (supported)" would be generally disclosed in another category than "RES (unsupported)"
 - Please note: unlike the first example from DE and CH, this approach would not include an allocation mechanism for supported RES, but only a separate fuel category for disclosure.
- The alternative to this distinction is to disclose supported RES (or also other supported fuels and technologies) within the same fuel category as unsupported shares, like is done in most countries for the time being.
- At least some green power labels clearly exclude supported RES (and corresponding RES GOs, respectively).

1) Disclosure of additional parameters

1.1) Shares of supported electricity: Options for implementation – Examples DE / CH



1) Disclosure of additional parameters

1.1) Shares of supported electricity: Questions for assessment

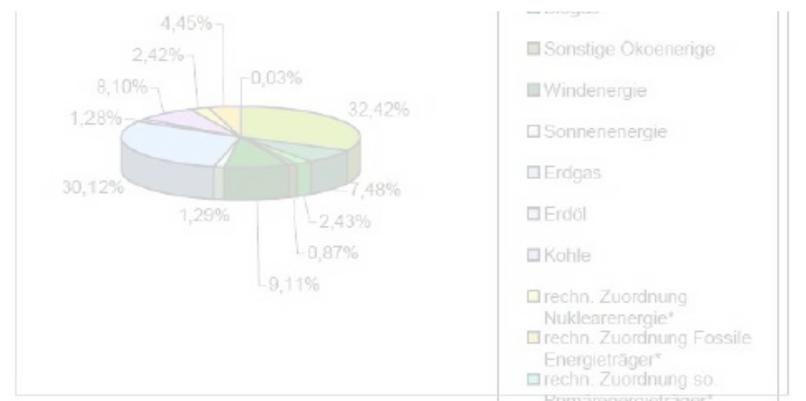
1. What is your position regarding the distinction of supported RES shares in combination with a special allocation mechanism of (national) supported RES?
2. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
3. What is your position regarding the distinction of supported RES shares according to the status of support as documented by GOs which have been used (i.e. separate disclosure categories for supported RES and unsupported RES, but no specific allocation mechanism for supported RES)?
4. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
5. Reasoning and additional comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

1) Disclosure of additional parameters

1.2) Distinction of country of origin: Options for implementation

- In some countries, domain of origin is of key interest for end consumers. At least for GO based products, disclosure of countries of origin would be easily possible from a technical point of view.
- The share of imported GOs could be indicated
- Example Austria: Countries of origin of used GOs have to be indicated together with the respective shares in %.

Biogas	2,43%
Sonstige Ökoenergie	0,87%
Windenergie	9,11%
Sonnenenergie	1,29%
Erdgas	30,12%
Erdöl	1,28%
Kohle	8,10%
rechn. Zuordnung Nuklearenergie*	2,42%
rechn. Zuordnung Fossile Energieträger*	4,45%
rechn. Zuordnung so. Primärenergieträger*	0,03%
Summe	100,0%



100% der Nachweise stammen aus Österreich

* Eine rechnerische Zuordnung erfolgt für Strom unbekannter Herkunft. Für diesen wird die Aufteilung der Produktion im europäischen Übertragungsnetzgebiet herangezogen. Im Jahr 2010 setzte sich diese Produktion folgendermaßen zusammen: fossile Energieträger: 64,5%, Nuklearenergie: 35,08%, sonstige Energieträger: 0,42%.

Bei der Erzeugung entstanden folgende Umweltauswirkungen	
CO ₂ -Emissionen	203,1 g/kWh
radioaktiver Abfall	0,2 mg/kWh

freiwillige Zusatzangaben:

100% der für die Stromkennzeichnung verwendeten Herkunftsnachweise wurden gemeinsam mit der elektrischen Energie erworben

100 % of GOs originate from Austria.

1) Disclosure of additional parameters

1.2) Distinction of country of origin: Questions for assessment

1. What is your position regarding indicating the geographic origin in electricity disclosure by specification of the share of imported electricity / Gos as compared to national production?
2. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
3. What is your position regarding indicating individual countries of origin in electricity disclosure?
4. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
5. Reasoning and additional comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

1) Disclosure of additional parameters

1.3) Detailed categorisation of fuels and technologies: Options for implementation

- In many countries, only RES, FOS and NUC are distinguished; until now, also the RE-DISS Residual Mix only distinguished those three main categories in residual mix calculation
- Several other countries already require a distinction on a more detailed level (see the following table, based on RE-DISS country profiles 2012)
- Such distinction introduces more complexity, while it allows for separating e.g. fossil fuels with high CO₂ intensity (coal) from those with low CO₂ intensity (e.g. gas)

	Energy source	Number of countries	Further details		
RES	Renewable	15	general category, includes other renewables		
	Hydro	8			
	Biomass	8	includes solid biomass and liquid biomass category		
	Wind	8			
	Solar	6			
	Biogas	5	includes landfill gas and sewage gas category		
	Geothermal	3			
	Waste	2			
FOS	Coal	13	of which	Hard coal	1
				Lignite	1
	Fossil	10	of which	Other fossil	2
	Natural gas	14			
	Oil	9			
NUC	Nuclear	18			

Source: RE-DISS II

1) Disclosure of additional parameters

1.3) Detailed categorisation of fuels and technologies: Options for implementation

- In some countries, individual fuel categories are only shown on voluntary basis or in case they are larger than 0%; different examples:
 - UK: Voluntary categorisation of more detailed levels than RES, NUC, FOS (Ofgem FMD Guidelines 2005)
 - CH: some sub-category (e.g. solar or other detailed RES) only listed in case this is larger than zero
 - DE: listing of all mandatory fuel categories (even if they are zero)
- RE-DISS will provide the residual mix as of 2013 data according to the following detailed fuel categories:

Renewable	Unspecified & Other
	Solar
	Wind
	Hydro
	Geothermal
	Biomass
Nuclear	
Fossil	Unspecified & Other
	Hard Coal
	Lignite (or Brown Coal)
	Natural Gas
	Oil

1) Disclosure of additional parameters

1.3) Detailed categorisation of fuels and technologies: Questions for assessment

1. What is your position regarding the distinction of fuels on a more detailed level than RES, FOS and NUC?
2. Would you recommend to add (or delete) specific fuels to (from) the before mentioned suggested list?
3. In your opinion, should the individual (more detailed) categories be disclosed...
 - ...mandatorily;
 - ...only if larger than zero;
 - ...voluntarily (as sub-category to mandatory main categories)?
4. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
5. Reasoning and additional comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?
6. Do you think inclusion of additional information on technology (particularly overall percentage of HE CHP) besides the fuel mix should be taken into account in disclosure?
 - a) On a voluntary or mandatory level?
 - b) Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
 - c) Reasoning and additional comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

1) Disclosure of additional parameters

1.4) Provision of further environmental indicators: Options for implementation

- Standard implementation: Obligatory provision of
 - **CO₂** (or possibly CO₂eq) and
 - **radioactive waste**
 - Please note: the current RE-DISS project has a specific work package focussing on data quality of the environmental indicators mentioned above, which also works on the questions of 1) best units for these parameters, 2) plant-specific vs. generic figures, 3) direct emissions vs. life-cycle emissions and 4) of CO₂ vs. CO₂eq
- In Denmark (having a national generation mix which is dominated by fossil combustion) also further environmental indicators are provided:
 - emissions of **CO₂** and **radioactive waste**
 - furthermore emissions of **CO₂eq, CH₄, N₂O, SO₂, NO_x CO, NMVOC** (non-methane volatile organic compounds) and **particles**
 - residual products: **coal ash, coal slag, desulphurization products, waste slag, waste incineration residues** and **bio ashes**
- With a view on major renewable generation shares at least in individual countries possibly further environmental indicators like **environmental LCA, landscape conservation or consumption of natural resources** can be considered.
 - This is currently done in a project charged by the Swiss Federal Office of Energy SFOE for assessing options for further development of electricity disclosure in Switzerland.

1) Disclosure of additional parameters

1.4) Provision of further environmental indicators: Questions for assessment

1. Should information on nuclear waste and on CO₂ emissions be disclosed together with the general disclosure statements (e.g. on the annual bill) or only being referred to (e.g. on a website)?
2. What is your position regarding the provision of more detailed environmental indicators besides nuclear waste and CO₂ (or possibly CO₂eq) ...
 - a) ...in general?
 - b) ...in countries with high shares of fossil (referring to additional emissions)?
 - c) ...in countries with high shares of RES (referring to aspects like comprehensive environmental footprinting, use of natural resources, land consumption, ...)?
3. Should (if at all) additional voluntary information be disclosed together with the general disclosure statements (e.g. on the annual bill) or only being referred to (e.g. on a website)?
4. Do you consider provision of more detailed environmental indicators of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
5. Reasoning and comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

1.5) Communication of additionality aspects: Options for implementation

- For final consumers in liberalised markets ecological additionality is relevant information when choosing own supply.
 - Typical additionality aspects comprise improvement of ecological quality (particularly with respect to hydropower) or additional RES capacities
 - Usually mandatory electricity disclosure is limited to straight forward accounting of attributes without giving meaningful information about additionality
- Art. 15 (12) RES-Directive 2009/28/EC lines out a possible approach for giving additionality information by highlighting shares of RES deriving from "new" plants with operational date later than 25 June 2009 (after coming into force of the RES Directive)
 - According to RE-DISS assessments, no European country applies this approach for the time being.
- For Portugal and Slovenia, Competent Bodies have indicated towards RE-DISS that suppliers have to inform consumers about further information on environmental impacts of electricity production, e.g. at websites or on further information material.
- In countries with a clearly defined content (and format) of electricity disclosure statements, this might mean that it is not possible even on voluntary basis to disclose additionality or ecological quality aspects (e.g. Austria).

1) Disclosure of additional parameters

1.5) Communication of additionality aspects: Options for implementation

- Usually, information on additionality is provided by voluntary labelling programmes, independently from legally regulated electricity disclosure.
- In UK and DK competent authorities have actively contributed to development of criteria
 - DK: Energinet.dk has cooperated with branch organisations and NGOs for elaborating a Danish standard for 'green' electricity, including requirements in the description of the products and what suppliers can claim in relation to climate effect (www.elpristavlen.dk)
 - UK: Ofgem has established a voluntary green tariff scheme in place with a clear set of rules on additionality levels and communication requirements (<http://www.greenenergyscheme.org/>).
- In UK, Ofgem has just conducted an [open consultation](#) on green and renewable energy offers. In this context, Ofgem has proposed to mandatorily require an explicit statement on the level of additionality for all explicit "green" or "renewable" products. In practice, such a requirement could mean that for renewable products without specific additionality characteristics suppliers would have to state that no additionality/no further increase of RES production is related to consumption of this electricity product.
- In several countries Competent Bodies have indicated towards RE-DISS that there are specific regulations on eligible claims with respect to carbon claims, e.g. UK, Norway and Ireland.

1) Disclosure of additional parameters

1.5) Communication of additionality aspects: Questions for assessment

1. What is your position regarding the provision of additionality aspects together with electricity disclosure?
 - a) Should such information (if at all) be provided on voluntary or on mandatory basis for all products with ex-ante claims?
2. Do you think competent authorities should have an active role in regulating communication of additionality aspects at all?
 - a) If so, by which means should competent authorities be involved (e.g. coverage in disclosure, definition of voluntary labelling standards (at least as one of several cooperating partners), other...)?
3. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
4. Reasoning and comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

1) Disclosure of additional parameters

1.6) Distinction of the tracking mechanisms used: Options for implementation

- In order to distinguish between different suppliers, one option to accentuate actual market behaviour would be to distinguish in electricity disclosure of a supplier which part of his fuel share derives from the actual active market behaviour and which part is just passively "inherited" from a residual mix.
- At least in some countries, NGOs have been in favour of tracking along the electricity contracts rather than by using GOs which are not linked to the electricity contract.
- This raises the question about the relevance of disclosing not only the fuel shares, but also indicating the respective means of tracking, e.g.
 - GOs
 - Linked or de-linked with electricity contracts?
 - GOs for own production
 - Residual Mix / Default share
 - Other tracking instruments, if applicable (particularly relevant for supported electricity)

1) Disclosure of additional parameters

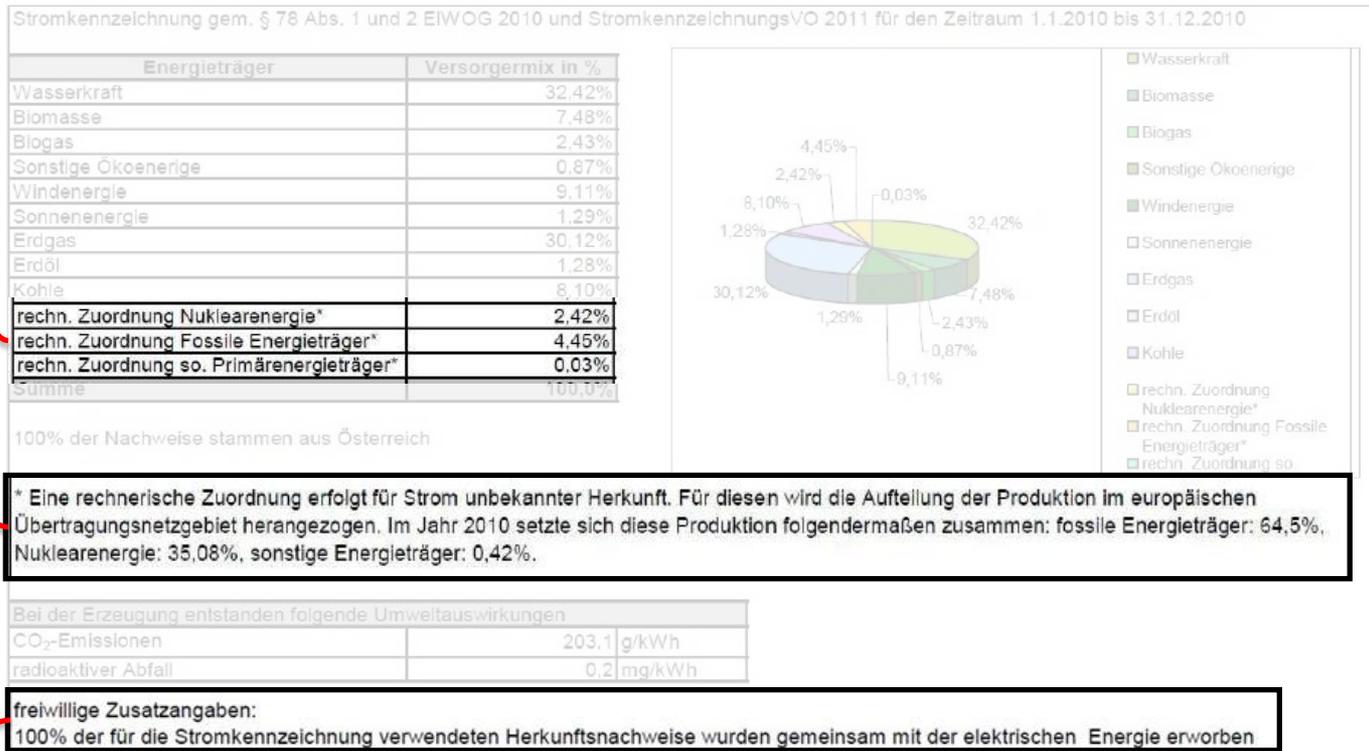
1.6) Distinction of the tracking mechanisms used: Options for implementation – examples:

- Switzerland and Germany disclose shares of pro-rata allocated RES-E deriving from the national support schemes (see also Section 1.1).
- Austria indicates on voluntary basis whether GO have been used linked with or delinked from physical electricity contracts from the same production plants in the same period
- Until introduction of "full" GO system as of disclosure year 2014, Austria also provides the fuel mix of the residual mix separately to other fuel shares.
- Also the German GO registry allows for distinction of linked and de-linked GO use (while it is not regulated how this should be differentiated in disclosure statements).
- Spain discloses the number of GOs that were acquired by the supplier, resulting in X% of supply coming from RES or HE CHP

1) Disclosure of additional parameters

1.6) Distinction of the tracking mechanisms used: Options for implementation – example Austria

A calculatory assignment is applied for electricity of unknown origin. For these volumes the relative shares of production in the European transmission grid is applied. In 2010, this production had the following fuel mix: fossil 64,5%, nuclear 35,08 %, others 0,42 %



Voluntary additional information:
100% of guarantees of origin used for disclosure have been purchased linked with the electrical energy.

1) Disclosure of additional parameters

1.6) Distinction of the tracking mechanisms used: Questions for assessment

1. What is your position regarding the distinction of tracking instruments in disclosure statements ...
 - a) ...in principle?
 - b) ...with respect to linked vs. de-linked application of GO?
 - c) ...with respect to indication of own production?
2. Should such information (if at all) be disclosed on voluntary or on mandatory level?
3. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
4. Reasoning and comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

2) SPECIFIC FIELDS OF INTEREST FOR RECOMMENDATIONS ON DISCLOSURE RELATING TO PRESENTATION OF INFORMATION

Requirements by Art. 9 IEM Directive 2009/72/EC

Member States shall ensure that electricity suppliers specify in or with the bills and in promotional materials made available to final customers:

- a) the contribution of each energy source to the overall fuel mix of the supplier [...] in a comprehensible and, at a national level, clearly comparable manner;*
- b) at least the reference to existing reference sources, such as web pages, where information on the environmental impact [...] is publicly available.*

[...]

The regulatory authority or another competent national authority shall take the necessary steps to ensure that the information provided by suppliers to their customers pursuant to this Article is reliable and is provided, at a national level, in a clearly comparable manner.

2.1) Standard format for electricity disclosure: Options for implementation

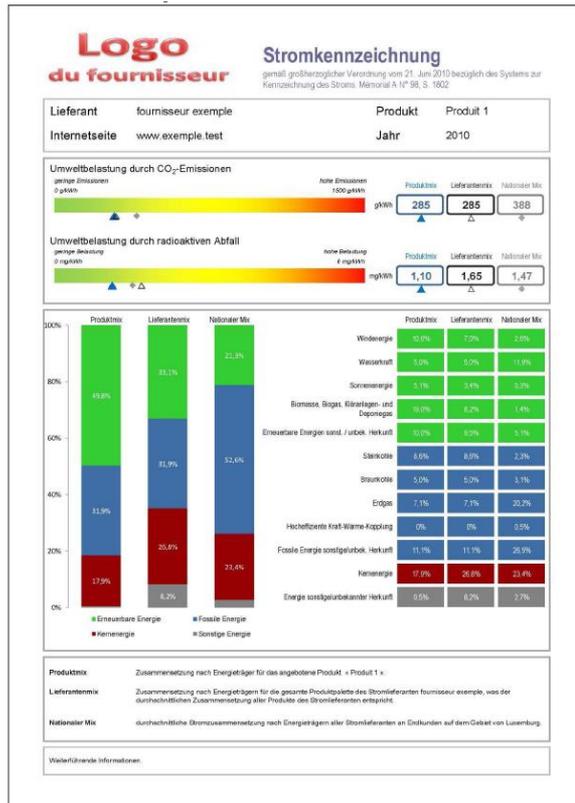
- Following the Directive, it is to the discretion of Member States, which level of specifications is deemed necessary for safeguarding the "comparability on a national level". Different options could be either describing minimum format and display requirements or also provision of a mandatory format template.
- Germany, Sweden, Spain and Slovenia, Austria e.g. require display in graphical format (or, more specifically, pie charts).

- Also RE-DISS currently recommends display of main information in pie charts, with additional information possibly to be provided in tables (see illustrative example).

	Product "Green"	All deliveries of "Sample Supplier"	National generation mix
Nuclear	0,0%	15,0%	17,9%
Coal	0,0%	35,0%	43,5%
Natural gas	0,0%	15,0%	13,7%
Other non-renewable sources	0,0%	10,0%	4,5%
Hydro power	85,0%	22,0%	3,0%
Other renewable sources	15,0%	3,0%	17,4%
of which wind	5,0%	1,0%	8,1%
of which biomass	10,0%	2,0%	5,0%
of which photovoltaic	0,0%	0,0%	3,2%
High-efficient cogeneration of electricity and heat	5,0%	7,0%	8,5%
CO ₂ emissions [g/kWh]	0	486	529
Radioactive waste [µg/kWh]	0	450	537

2.1) Standard format for electricity disclosure: Options for implementation

- Denmark, Ireland, Luxembourg and Spain provide standard template with graphical display
- Switzerland provides two alternative standard tables, including minimum size



Source: Ministère de l'Economie Luxembourg

Stromkennzeichnung		
Ihr Stromlieferant:	EVU ABC (Bsp.)	
Kontakt:	www.evu-abc.ch, (Bsp.), Tel. 099 999 99 99	
Bezugsjahr:	2010	
Der gesamthaft an unsere Kunden gelieferte Strom wurde produziert aus:		
in %	Total	aus der Schweiz
Erneuerbare Energien	51,0 %	41,0 %
Wasserkraft	50,0 %	40,0 %
Übrige erneuerbare Energien	0,0 %	0,0 %
Geförderter Strom ¹	1,0 %	1,0 %
Nicht erneuerbare Energien	44,0 %	29,0 %
Kernenergie	44,0 %	29,0 %
Fossile Energieträger	0,0 %	0,0 %
Abfälle	2,0 %	2,0 %
Nicht überprüfbare Energieträger	3,0 %	
Total	100,0 %	72,0 %

¹ Geförderter Strom: 45 % Wasserkraft, 7 % Sonnenenergie, 20 % Windenergie, 25 % Biomasse und Abfälle aus Biomasse, 3 % Geothermie

Source: Swiss Energieverordnung 2009

2.1) Standard format for electricity disclosure: Questions for assessment

1. What is your position regarding the regulation of the format of the disclosure statement, ...
 - a) ...should it be the exactly same standard format?
 - b) ...should it be a generic description of the format?
2. Should there be room for "voluntary extra information"?
3. Do you agree to the following proposal?
 - Display of main information parameters should be in graphical form
 - More detailed information could be in table or text format
4. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
5. Reasoning and comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

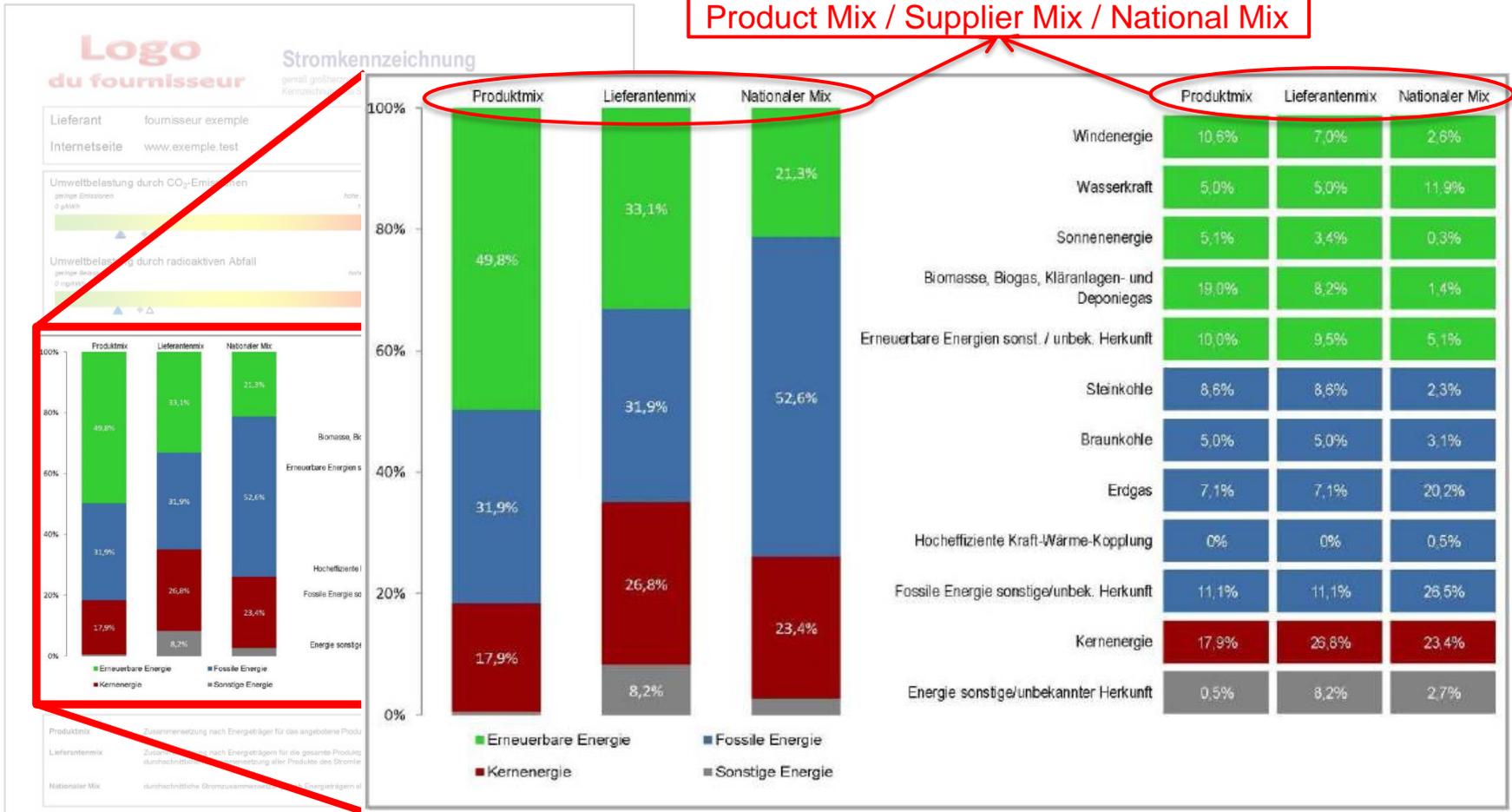
2.2) Provision of comparison values: Options for implementation

- Comparison values are relevant for consumers so that they can evaluate the meaning of their personal supply (and related environmental impacts)
 - Mandatory information due to Directive: supplier mix
 - Additional relevant information for stimulation of markets: product mix
 - Reference value for comparison: national production mix (or possibly national consumption mix?)
- It should be noted that in case that a production mix is provided to some of the customers of a supplier, it should be disclosed to all of them (including the consumers of a "company's residual mix" product) in order to avoid double counting between the customers of different products of individual suppliers.
- With respect to a national comparison value, this should be ideally consistently provided by a central organisation
- Several countries require provision of a national reference, including Germany, Luxembourg, Ireland, UK, Ireland, Italy, Spain or Portugal (here it is available at the competent body's website)

2) Presentation of Information

2.2) Provision of comparison values: Options for implementation – example Luxembourg

Product Mix / Supplier Mix / National Mix



Source: Ministère de l'Economie Luxembourg

2.2) Provision of comparison values: Questions for assessment

1. What is your position regarding the provision of comparison values besides product and supplier mix?
 - a) Should this (if at all) be the national production mix or any other mix (e.g. national consumption mix)?
2. Do you consider this comparison relevant particularly for environmental information, for fuel mix or for both?
3. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
4. Reasoning and comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

2.3) Evaluative presentation: Options for implementation

- Electricity disclosure is usually implemented as "neutral" provision of information rather than as "judgemental"
- To some extent, "implicit" judgemental layout e.g. by "traffic light" color coding of environmental parameters takes place (see Luxembourg example on this page)
- In principle, rating of products can also take place (comparable to EU Efficiency Label) like in Spain (next page); see also section 1.5 on additionalty)



Environment pollution by CO₂ emissions

Umweltbelastung durch CO₂-Emissionen

Environment pollution by radioactive waste

Umweltbelastung durch radioaktiven Abfall



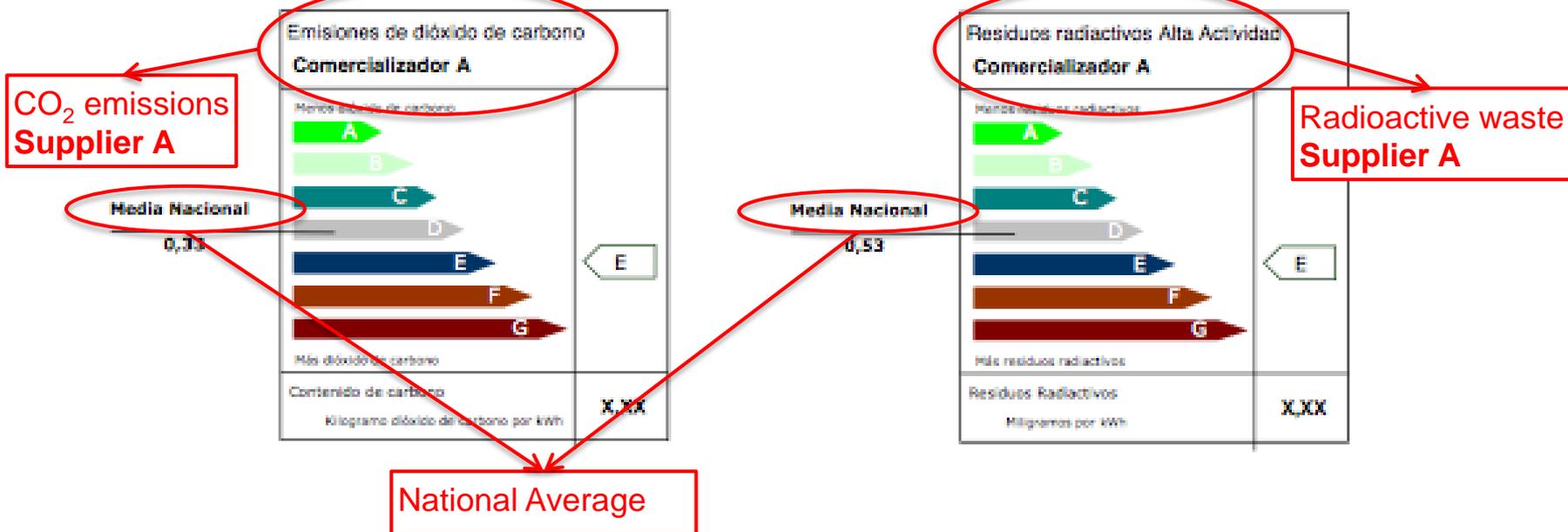
Source: Ministère de l'Economie Luxembourg

2.3) Evaluative presentation: Options for implementation – Example Spain

The environmental impact of your electricity depends on the energy sources used for its generation. On a scale from A to G where A indicates the smallest environmental impact and G the largest, and where the national average corresponds to level D, the electricity provided by "Supplier A" has to the following values:

Impacto medioambiental

El impacto ambiental de su electricidad depende de las fuentes energéticas utilizadas para su generación. En una escala de A a G donde A indica el mínimo impacto ambiental y G el máximo, y que el valor medio nacional corresponde al nivel D, la energía comercializada por su "Comercializador A" tiene los siguientes valores:



2.3) Evaluative presentation: Questions for assessment

1. What is your position regarding an evaluative illustration?
 - a) Should such presentation (if at all) apply to only CO₂ and nuclear waste, or also to any other information (please specify, and propose scale for measure)?
2. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
3. Reasoning and comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

2.4) Presentation of information on a national platform: Options for implementation

Provision of disclosure information for all different energy offers on one central platform (e.g. website, or in a public report by the competent authority) can be a means for enhancing comparability of electricity disclosure for consumers, thus supporting informed choice of supply in liberalised markets. This is implemented in various European Countries, e.g.:

- PT: the website of ERSE, the Portuguese regulator, contains a comparison tool and also disclosure simulator (<http://simuladores.erse.pt/rotulagem>)
- CH: fuel mix of all suppliers (on a company level) is provided on www.stromkennzeichnung.ch
- UK: there is no regulated system in place, but there are voluntary websites showing the fuel mixes of GB suppliers (e.g. <http://electricityinfo.org/suppliers.php>)
- IE: The Regulators publish a report on the Annual Fuel Mix Disclosure on the [Allislandproject.org website](http://Allislandproject.org) (for both Ireland and Northern Ireland)
- AT: Regulator E-Control publishes disclosure information of Austrian suppliers in the [annual Austrian Disclosure report](#), including an assessment whether the disclosure statements accord to the legal requirements
- HR: Annual publication is planned for informing the general public (and customers) on disclosure. This annual publication will probably include information regarding active suppliers.
- ES: PDF of compared suppliers' mixes: <http://gdo.cne.es/CNE/resumenGdo.do?anio=2012>

2.4) Presentation of information on national platform: Questions for assessment

1. What is your position regarding such central provision of disclosure information on a national platform?
 - a) Would you prefer provision on a website or in a public monitoring report (see also section 3.1)?
2. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
3. Reasoning and comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

3) SPECIFIC FIELDS OF INTEREST FOR RECOMMENDATIONS ON DISCLOSURE RELATING TO FURTHER ASPECTS

3.1) Regulatory oversight and verification: Options for implementation

Art. 9 of the IEM Directive requires regulatory authority or another competent national authority to "*...take the necessary steps to ensure that the information provided by suppliers to their consumers [...] is reliable and is provided, at a national level, in a clearly comparable manner.*" In several countries, this is enhanced by special control mechanisms. Some examples:

- Active calculation of disclosure information by the competent body:
 - IE: Based on information provided by the individual suppliers, the fuel mix is calculated by the competent body, and approved and published by the regulators
 - ES: regulator calculates all mixes based on information supplied by TSO and on GOs
 - IT: similar calculation by competent body, based on data collected among suppliers
- Audit by public authority (mandatory or possibly on a random basis):
 - IE: regulator approves form and detail of disclosure statement prior to its issue to final customers
 - DK: Suppliers must transmit their annual disclosure information to competent body.
 - DE: disclosure information plus absolute supply volumes has to be provided to regulator BNetzA (and can be compared by the GO competent body UBA on consistency with cancellation volumes of RES-GO)
 - IT: disclosure information is collected by GSE (Italian Competent Body)
 - HR: disclosure information has to be provided to regulator, who can audit the data.
- Independent third party verification takes place e.g. in Norway (by accountant) and in Austria (when supply > 100GWh)
 - In some countries this is recommended only on voluntary basis, e.g. CH or DE

3.1) Regulatory oversight and verification: Questions for assessment

1. Do you think the competent body should perform checks and audits with respect to actual disclosure by suppliers?
 - a) Should such checks (if at all) take place on random or mandatory basis?
 - b) Should such checks include only a check of disclosed data or of presentation format or both?
2. Do you think the competent body should take over the responsibility of calculating the disclosure information (based on documentation by suppliers, cancelled GOs, etc.) rather than the supplier himself?
3. Do you consider this aspect of high relevance or of low relevance to be addressed by disclosure best practice guidelines?
4. Reasoning and comments? Which benefits or shortfalls of the respective approaches do you consider decisive for your assessment?

CONSULTATION TIMELINE AND CONTACT

- Responses to this consultation should be submitted to the RE-DISS project team by filling out the **Excel questionnaire** which is provided together with this background document.
- Please provide your opinions and preferences for the different discussed options (your "wish list"); the consultation is NOT aiming at assessing the status quo of implementation
- Please send this Excel spreadsheet via e-mail by **7th May 2014** to Dominik Seebach (d.seebach@oeko.de), project coordinator of the RE-DISS II project
- In case of any questions, please contact:
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