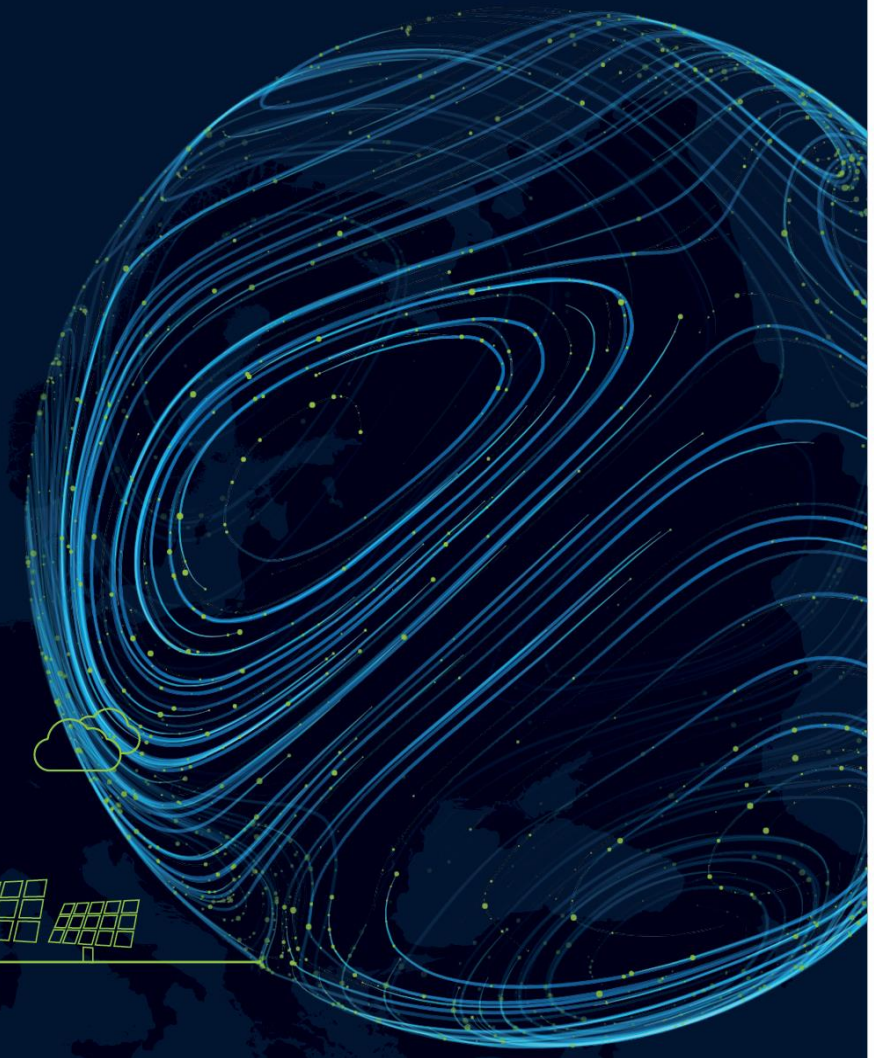
How to organize for gas GOs?

Joint Meeting of ERRA Gaseous Fuels Markets/Economic Regulation and Energy Transition Committees

ERRA

15 October 2025

Katrien Verwimp, Strategy coordinator – EECS , AIB



AIB

The Association of Issuing Bodies - Facts

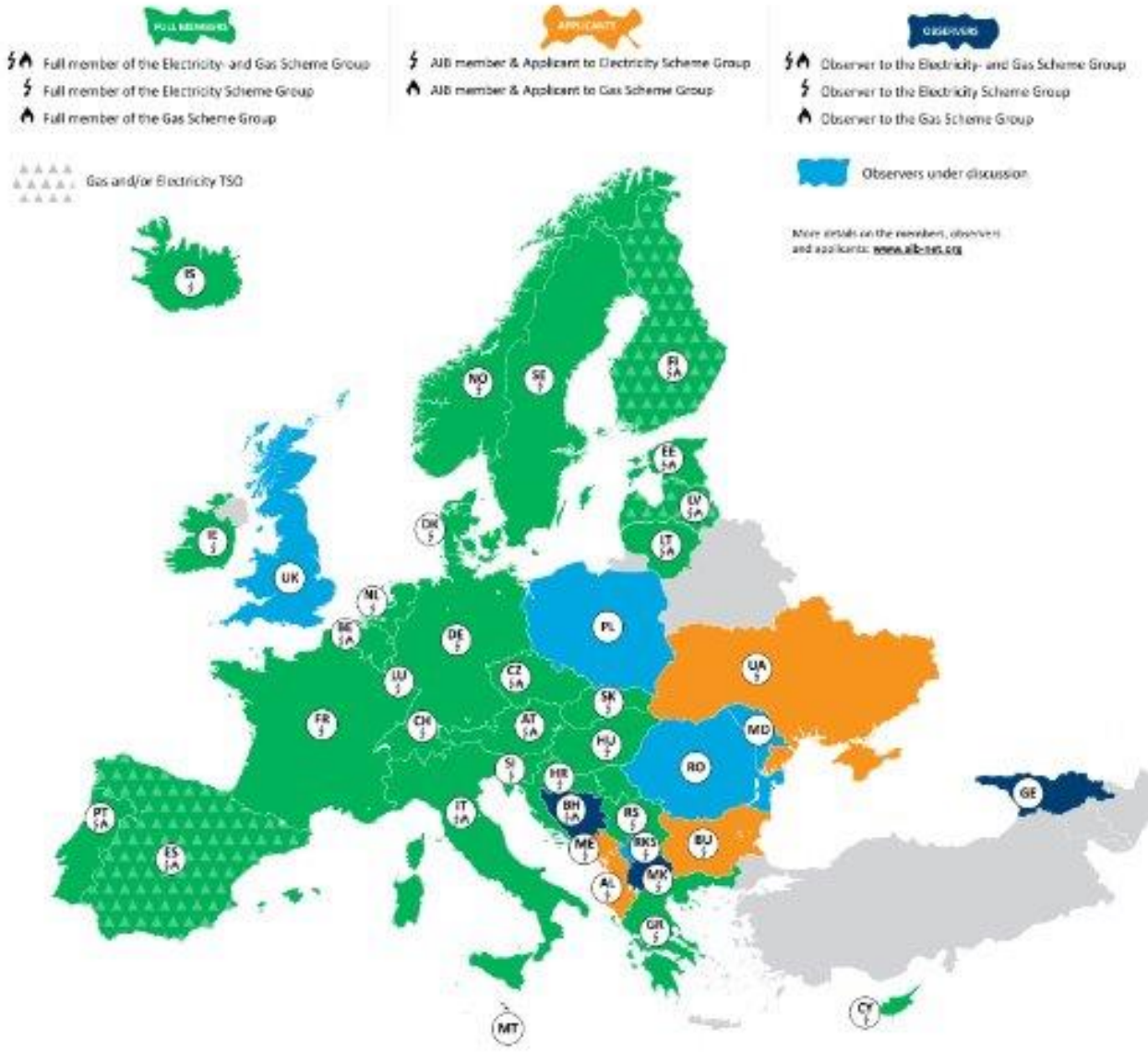
- AIB: non-profit association founded in 2002
- Now 30 countries connected (39 members)
- Geographical scope: EU - EFTA – Energy Community
- Issuing Bodies have diverse roles: regulator, market operator, TSO, ministry, power exchange etc.
- 30 AIB's current members issue EECS electricity GOs
- Several of AIB's members are also competent bodies for the supervision of electricity disclosure
- 23 AIB members assigned by their government for issuing GOs for gases – more to follow
  - Austria (E-Control), Belgium Brussels (Brugel), Belgium Flanders (VREG), Belgium Wallonia (SPW), Croatia (HROTE), Czech Republic (OTE), Energinet (Denmark), Estonia (Elering), Finland (Gasgrid Finland), France (EEX), Germany (UBA), Greece (Dapeep), Hungary (MEKH), Italy (GSE), Latvia (Conexus Baltic Grid), Lithuania (Amber Grid), Luxembourg (ILR), Netherlands (VertiCer), Portugal (REN), Slovenia (AGEN-RS), Spain (Enagas GTS), Slovakia (SPP-Distribucia), Switzerland (Pronovo)

Pillars of the European Energy Certificate System (EECS©)

I. **EECS Rules**: engaging into quality and harmonisation
II. **IT hub**: enables GO transfer between national/regional Domain registries
III. Peer reviews and **audits**

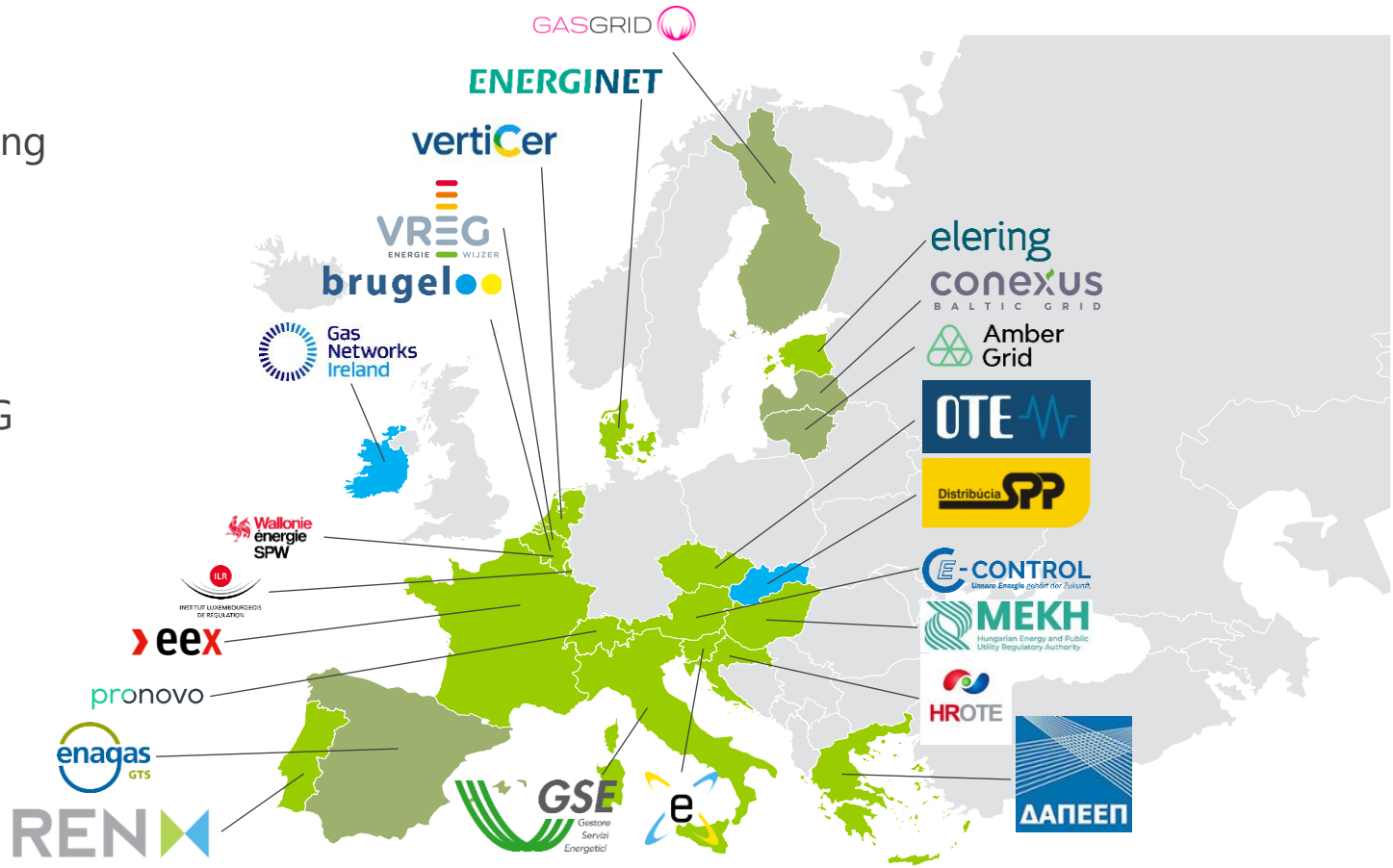
www.aib-net.org

AIB Mission: Guaranteeing the origin of European Energy



EECS Gas Scheme Group: a rapidly growing group

- **23 AIB members** are appointed Gas Issuing Bodies
  - 5 gas-only
  - 18 electricity & gas
- 1 gas-only IBs who are not yet AIB member
- Gas Scheme Group (GSG) applications ongoing
- EECS Gas Scheme Finetuning
  - ongoing with the onboarding members
- Formal GSG members (dd Oct 2025):
  - Domain Protocol for Gas approved by GSG
    1. AT – E-Control
    2. ES – Enagas
    3. LV – Conexus Balticgrid
    4. FI – Gasgrid Finland
    5. CZ – OTE
    6. IT- GSE
    7. EE- Elering
    8. BE-B – Brugel
    9. PT – REN
    10. NL- VertiCer
    11. CH – Pronovo
    12. LT - Ambergrid

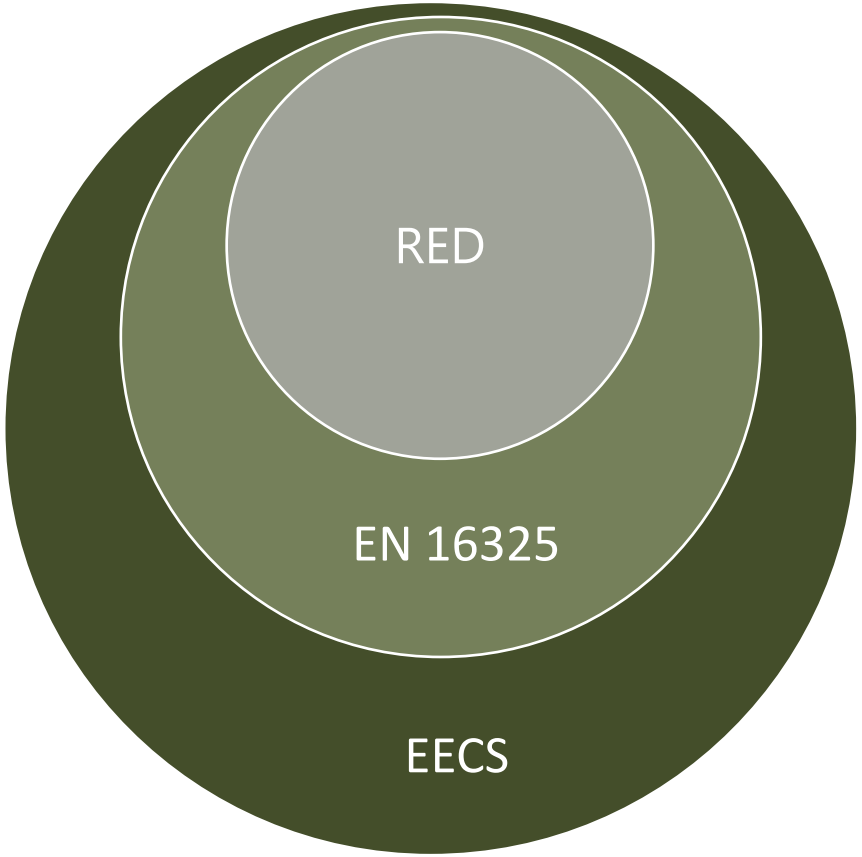


Framework for cross border harmonisation of guarantees of origin

1. GOs are for disclosure – legislation – RED art.19

2. Reliable GO system – mandatory standard – EN16325

3. Efficient and reliable GO system - voluntary standard - EECS



Note: EECS covers also other products than guarantees of origin

The AIB HUB: international transfer from account to account

Framework

International transfers of electronic documents

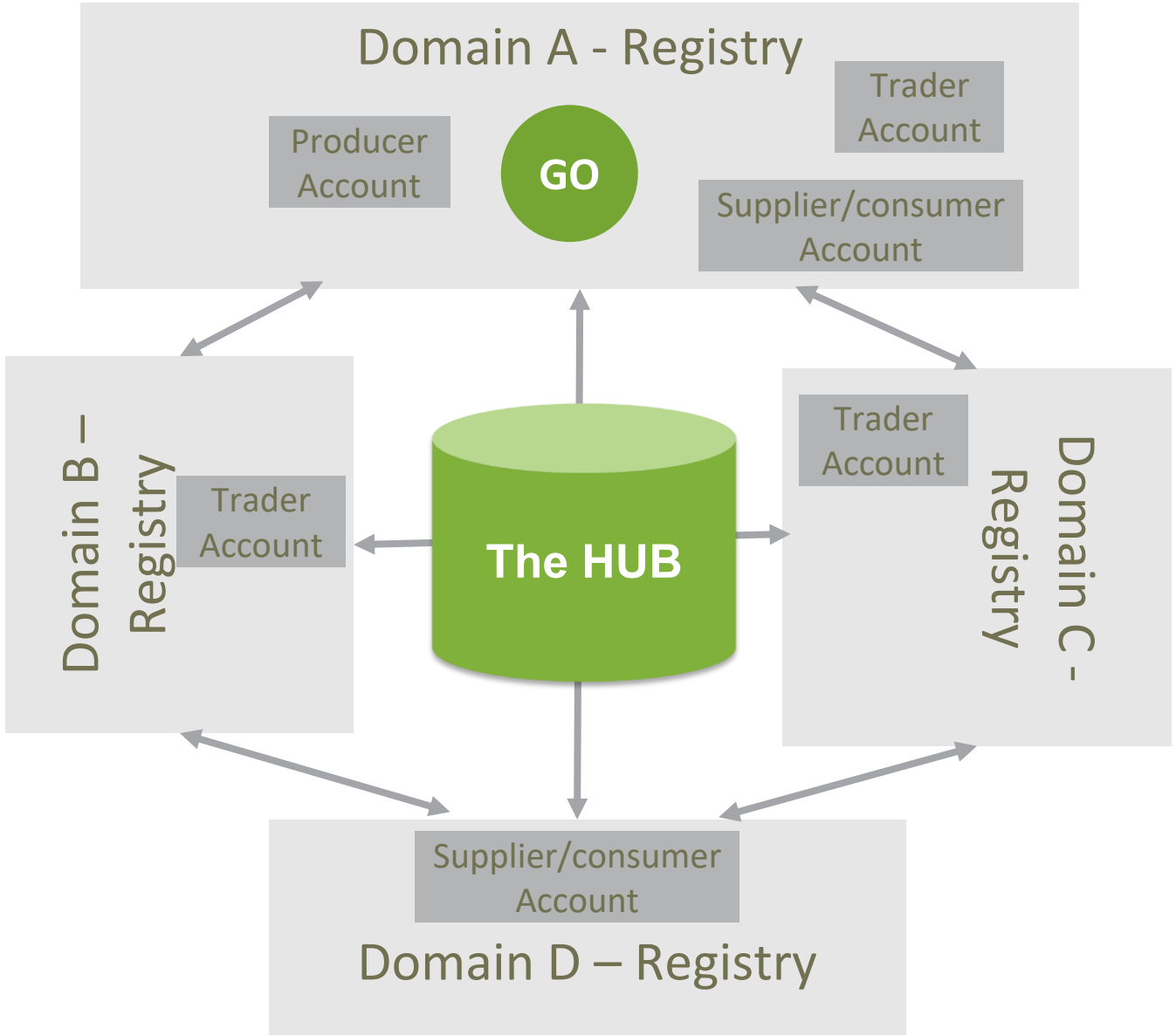
- 33 interconnected electricity and gas GO registries from 28 countries
- 1,1 billion GOs (1 100 TWh) transferred in a total of 69 000 cross border transfers in 2024
- Almost 23 000 account holders registered by our issuing bodies, able to transact GOs over the Hub

How

- Standardised
- Automated
- Jointly operated

Why

- Efficiency
- Trust
- Fraud prevention



https://www.aib-net.org/facts/market-information/statistics/activity-statistics-all-aib-members

What does a GO look like?

GO

In V81 Transparency enhances empowered consumer choices

Data on generic EECS Certificates

- Energy Carrier
  - Electricity / Energy Gas / Hydrogen
- Product
  - GO / Support Certificate / Target Certificate / Independent Criteria Scheme
  - Product name
- Unique certificate number
- Production period (start and end date/time, interval length)
- Energy source
- Type of installation
- Production device info
- Identity and country of originating member
- Issue date
- Identity and country of relevant competent body
- Purpose
  - Disclosure, Support and/or Target
- Support received by type
- Dissemination level
- Face Value
- Conversion Tag & Storage Tag
- Label(s) *
- Carbon Footprint *
- Storage System information *
- Production Device Module *
- Radioactive waste *
- Pre-conversion Information *

Additional on Electricity certificate

General

- Bidding zone information *
  - Identification
  - > 90% RES during previous year
  - < 18 gCO2eq/MJ during precious year
- PPA Information *

High-Efficiency Cogeneration

- High Efficiency Cogeneration Criterion Met?
  - *Y/N*
  - *If Yes, then also following fields are mandatory*
- Lower Calorific Value
- Use of Heat
- Primary Energy Savings
  - *% PES*
  - *Absolute PES*
- GHG Emissions
  - %
  - Absolute

Legend:

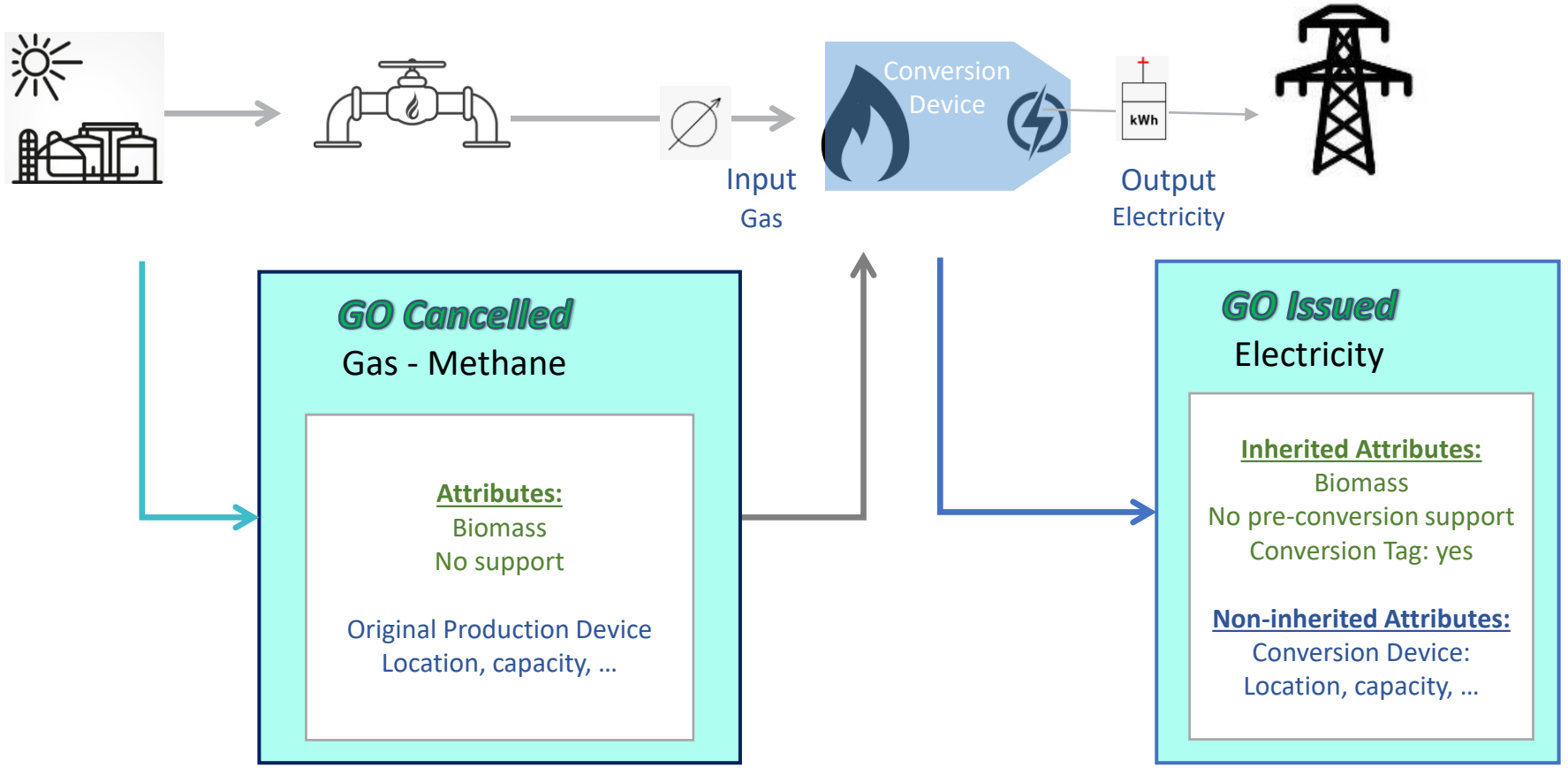
- Mandatory information field
- *Optional information field
- Data field updates in 2024 (V80) or 2026 (v81)

Additional on Gas certificate

- Type of Gas
  - *See Fact Sheet*
- Whether Higher or Lower Calorific Value
- GHG Emissions Saved & Produced *
  - + Methodology reference
- Sustainability Criteria met?*
  - *Y/N; requirements, scheme, name Certification Body, reference to report*
- GHG saving criteria met?*
- Calorific value *
- End-Use of gas category*
- Source-Shares *
- Pre-Conversion support info *
- PurityOfGas *
- CompositionCriteriaReference *
- Advanced Biofuel Criteria Met? *
- Fossil auxiliary deduction tag *
- EU-ETS eligibility tag *
- Gas Criterion Tag *

Attribute Inheritance after conversion

→ Balance simplicity with information relevance



The Domain Protocol

EECS

DOMAIN PROTOCOL

FOR

E-CONTROL – AUSTRIA

Document Reference	AIB-2023-DPAT- E-Control Austria
Prepared by	EECS Scheme Member
Release	2/2024
Date	25 September 2024
Based on EECS Rules	Release 8 v1.8

Association of Issuing Bodies ivzw
Registered Office: Koloniënstraat 11 | 1000 Brussels | Belgium
Tel: +32-(0)486-5583 01 | Email: info@aib-net.org | Website: https://www.aib-net.org
Enterprise number KBO BE0864.645.330 – RPR Brussels

EECS Electricity

DOMAIN PROTOCOL

FOR

EEX - FRANCE

Document Reference	AIB-2024 -DPFR - EEX - FRANCE
Prepared by	EECS Scheme Member
Release	8
Date	23 January 2024
Based on EECS Rules	Release 8 v1.6

Association of Issuing Bodies
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Enterprise number KBO BE0864.645.330 – RPR Brussels

EECS

DOMAIN PROTOCOL

FOR

GASGRID FINLAND OY – FINLAND GAS AND HYDROGEN

Document Reference	AIB-2024-DP1-Gasgrid
Prepared by	Finland Oy-Finland
Release	Gasgrid Finland Oy
Date	1.2024
Based on EECS Rules	18 January 2024
	Release 8 v1.7

Association of Issuing Bodies ivzw
Registered Office: Koloniënstraat 11 | 1000 Brussels | Belgium
Tel: +32-(0)486-5583 01 | Email: info@aib-net.org | Website: https://www.aib-net.org
Enterprise number KBO BE0864.645.330 – RPR Brussels

https://www.aib-net.org/facts/aib-member-countries-regions/domain-protocols

Domain Protocol:

Transparency on processes for reliable GO system

Account Holder Registration

- Prevent access of fraudulent actors
- Ensure rule-compliance contractually

Production Device Registration

- Verify plant data
- Ensure data maintenance and re-verification

GO Issuing

- Must be based on verified meter readings
- Verify shares of energy origin in multi-fuel pants

GO Transfer

- Secure and electronic transfer independently from the physical energy or energy trading
- Non-mutability and uniqueness of certificate data

GO Cancellation

- GO as the sole instrument to disclose renewable energy to consumers

Disclosure

- Disclosure of the energy origin sold/consumed
- Where applicable, calculation of the residual mix and obligation to use it for untracked energy

Competent Body

Roles in GO system management

Roles and responsibilitiees need to be sorted out

Authorised Issuing Body

- Registers Account Holders
- Issues GOs, enables transfers and cancels of GO

Registry Operator

- Operates GO registry on behalf of the Issuing Body

Production Registrar

- Assesses applications to register production devices
- Registers the production devices in the GO Registry
- Collects measured values from authorized measurement bodies

Measurement Body

- Collects and determines measured values of the Output of a Production Device
- Who? Grid operator (or if none, Producer/Registrant)
- Reports data to Production Registrar

Production Auditor

- Person or organisation Independent from the Registrant, Approved by the Authorised Body
- Examines Production Devices and information for GO issuance

These roles may be vested with the same or with a distinct party

Inspections of production (& devices) for GO applications

When Inspection?

- Mandatory for gases
- May be integrated in other national verification framework

What inspected?

- Accuracy of registered info on Production device, criteria met, compliant
- Meter(s) accurate, positioned correctly and adequate to determine # GOs
- Renewable origin / feedstock(s)
- Periodically: Feasibility of reported Output
- Optionally: additional info like sustainability compliance

Resources:

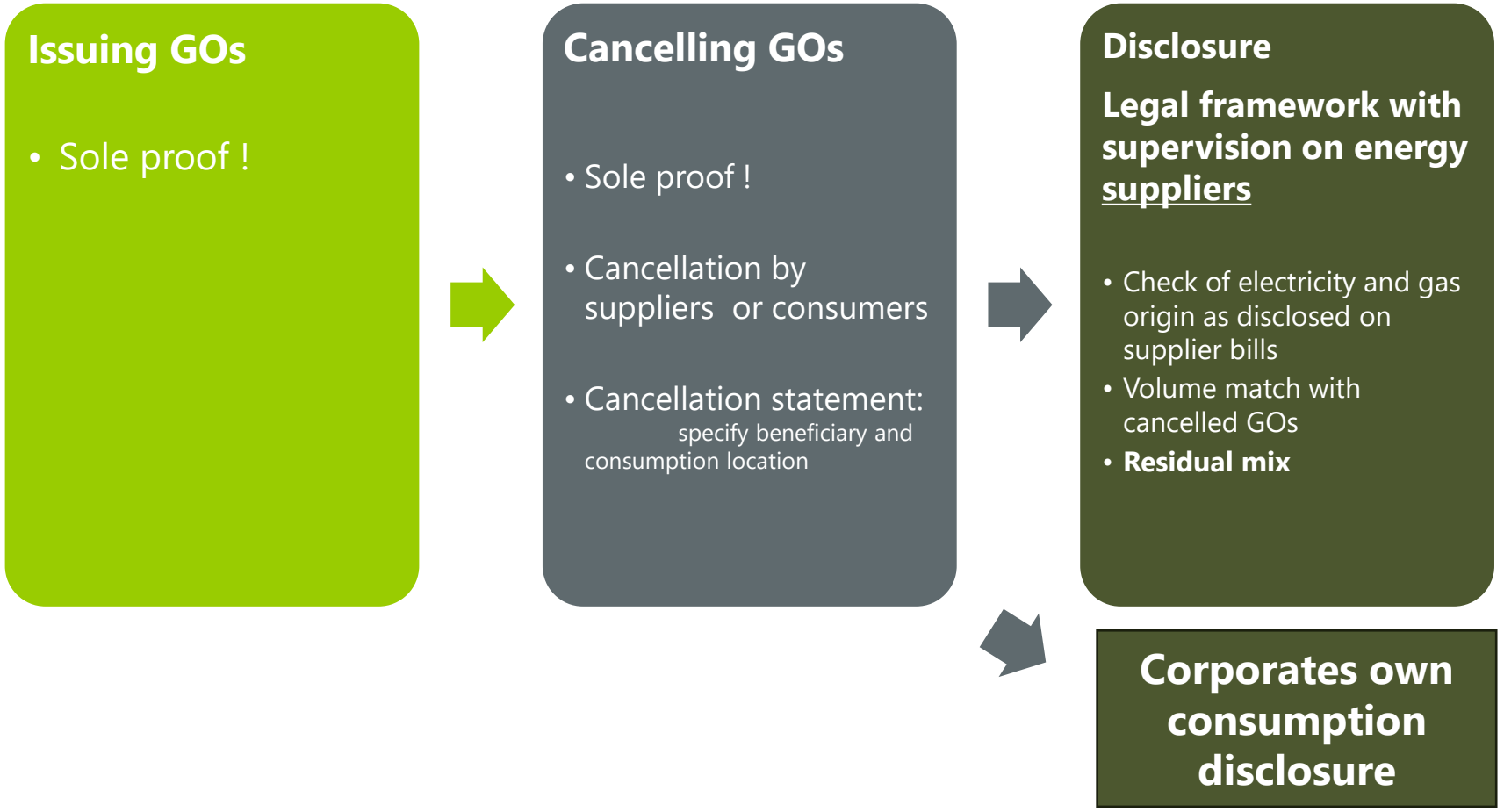
EECS E3.3.7, E3.3.11 , E3.3.12, N5, O5

Inspection Rules: Variations per country: see national Domain Protocols, section D6 https://www.aib-net.org/facts/aib-member-countries-regions/domain-protocols

Best Practice Recommendations For Production Device Inspections https://www.aib-net.org/eecs/best-practice-recommendations

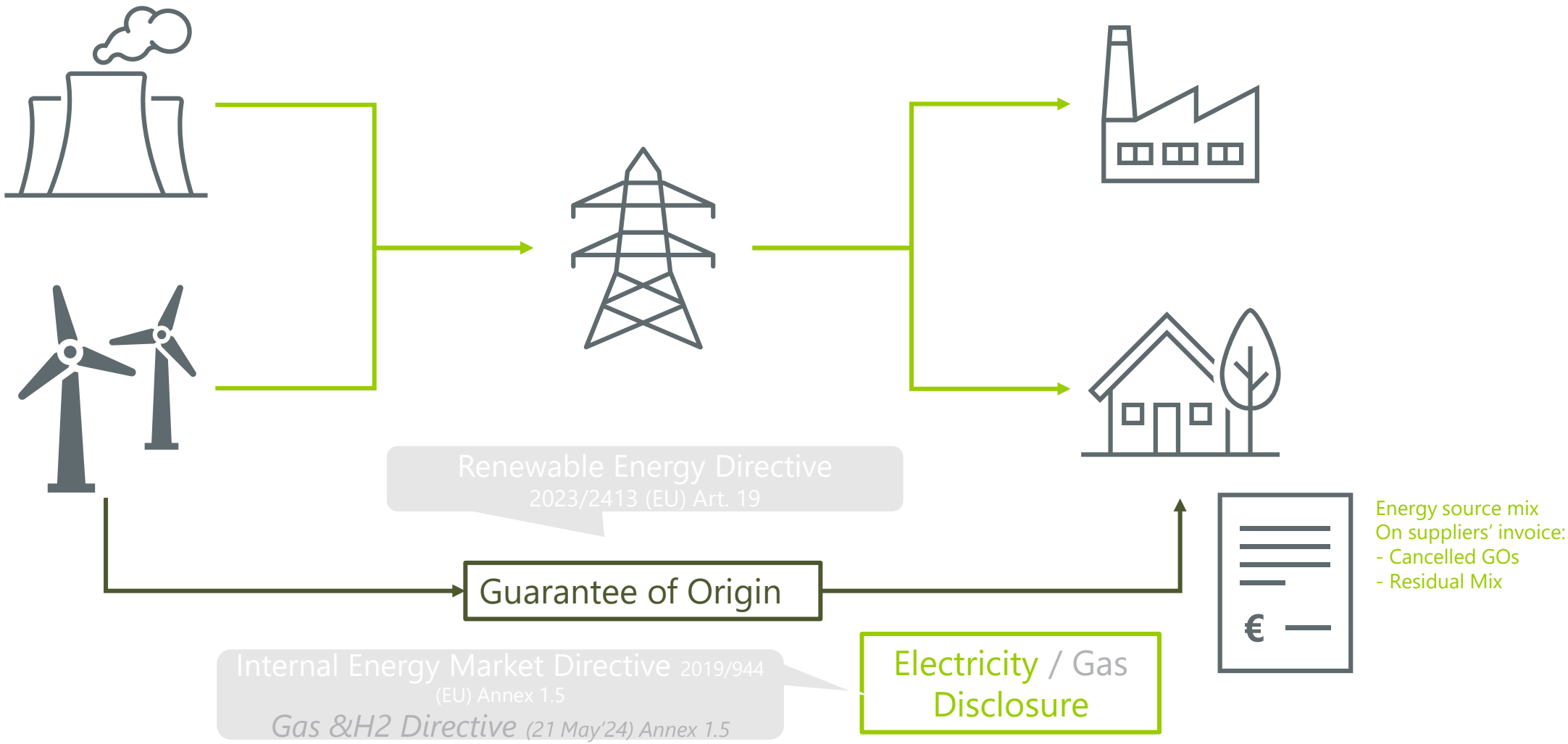
Disclosure ensures reliable origin claims

How to preventing double claims?
Regulating both GO cancellation AND consumption claims!



European Legislation to prevent double origin claims

Guarantees of Origin strengthened by supplier disclosure obligation



Disclosure obligations and guidance

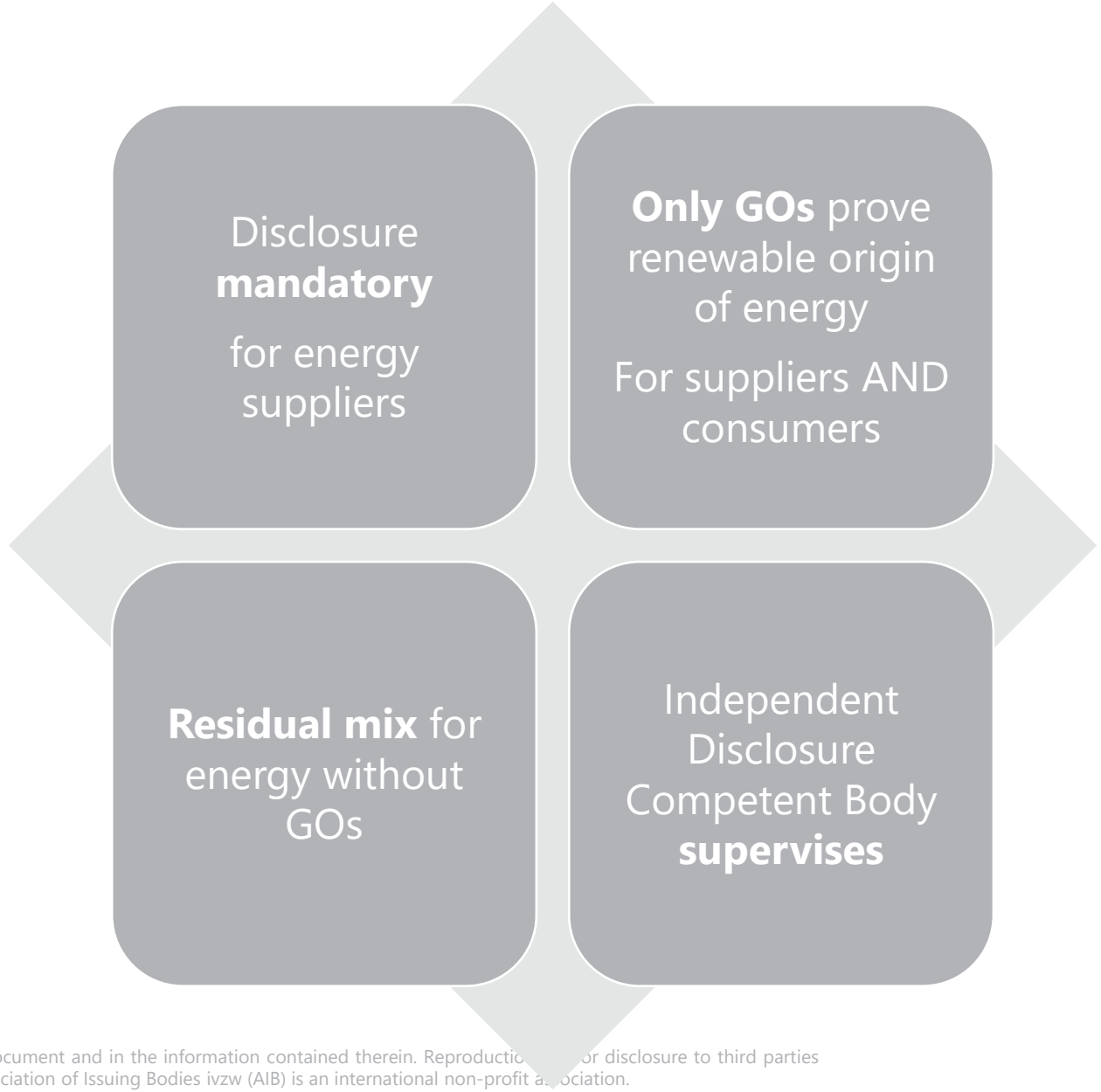
3 Disclosure obligations

- Suppliers
  - Gas Directive Annex 1.5
- Corporate Consumers
  - CSRD - ESRS
- Traders
  - (draft) Green Claims Directive

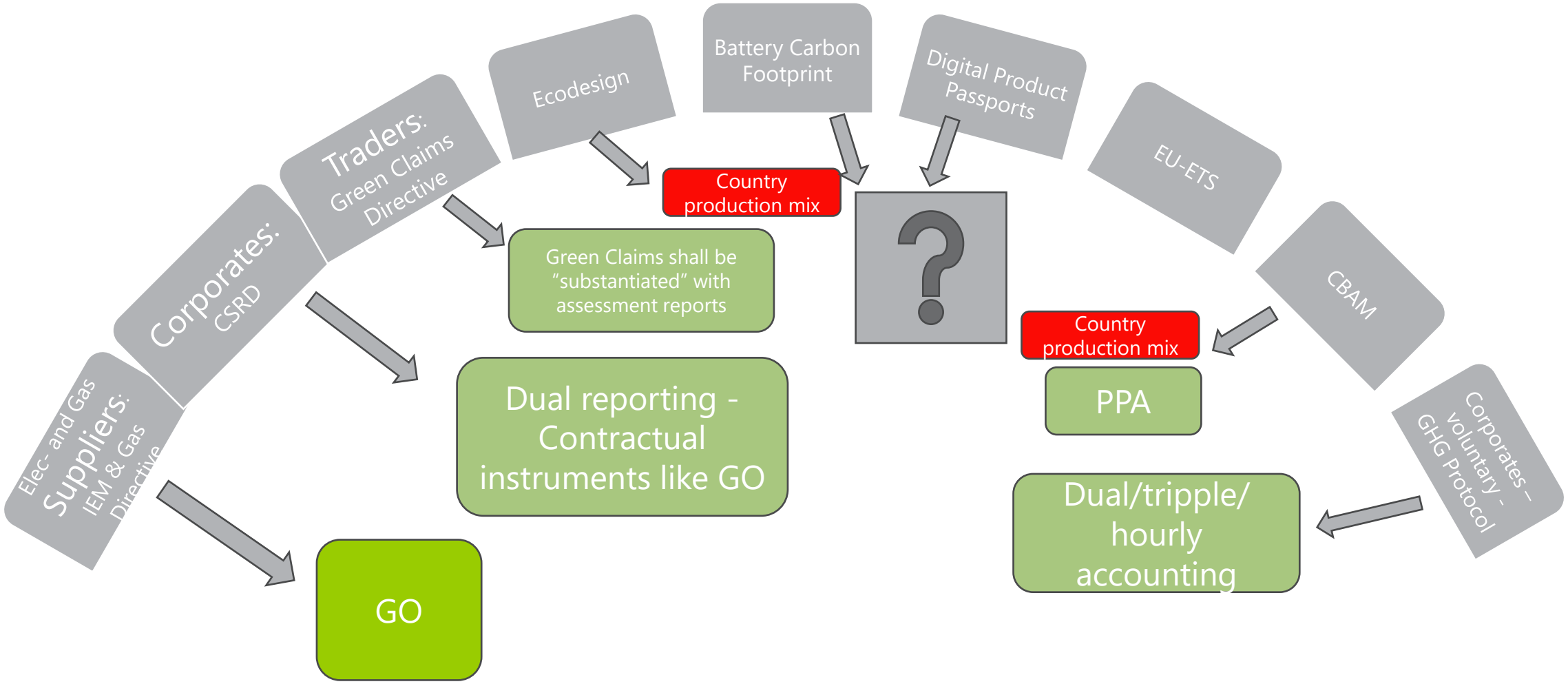
Guidance for Disclosure

- CEER Advice on Green Offers (2023)
- UBA project on Disclosure (2025-2026)
- REGADISS (2024)
- FaStGO (2020)
- EECS Rules
- RE-DISS (2009-2015)

Basic Principles for Reliable Disclosure



Origin Claims
EU legal frameworks for Disclosure - 3 directly, but more in practice

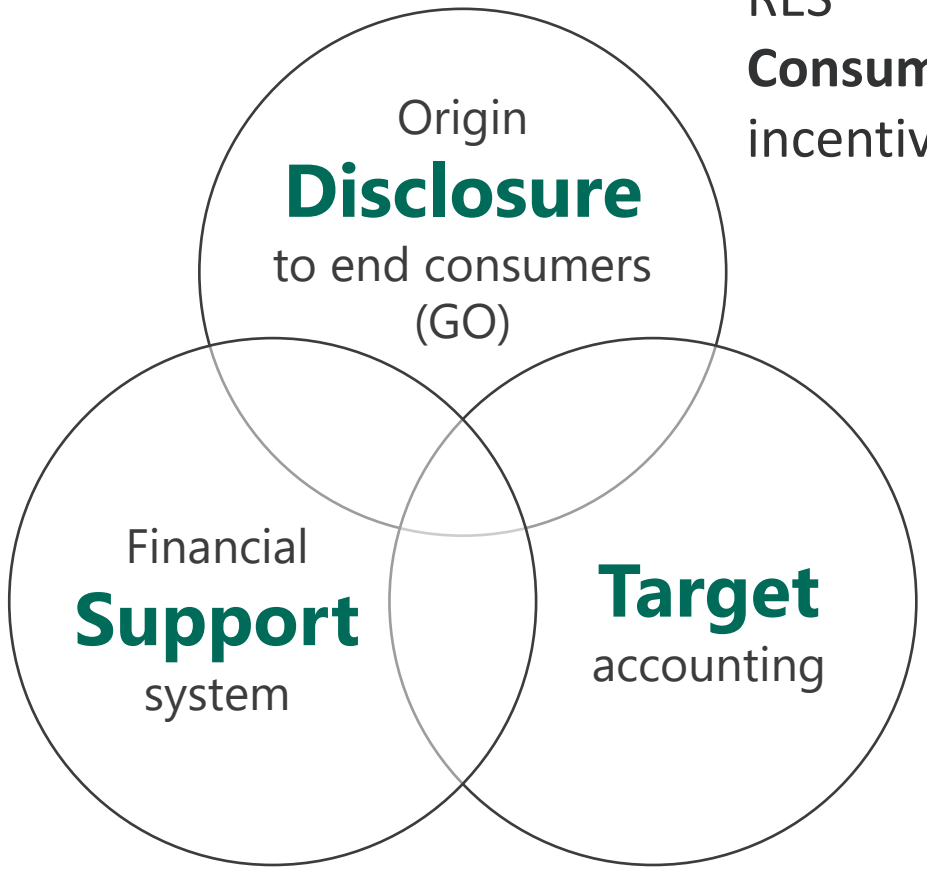


3 regulated systems – 3 purposes

EECS certificate structure enables certifying multiple purposes

RED art. 19

RES
Consumption
incentive



RES
Production
incentive

RED art. 4:
national support systems

Production target
based on overall
consumption
figures

RED art. 3
RED art. 25
…

Recommendations for improving the GO system

All renewable energy claims should be based on GOs to prevent double counting and build trust.

All energy tracking instruments need to be aligned with the GO system for consistency across sectors and EU policies.

Interacting legal requirements on gas origin tracking

→ **Disclosure: GO …**

→ **Policy Target accounting: PoS in UDB**

→ **GO and PoS tracking coming together in the Union Database**

"Where GOs have been issued for the production of a consignment of renewable gas,

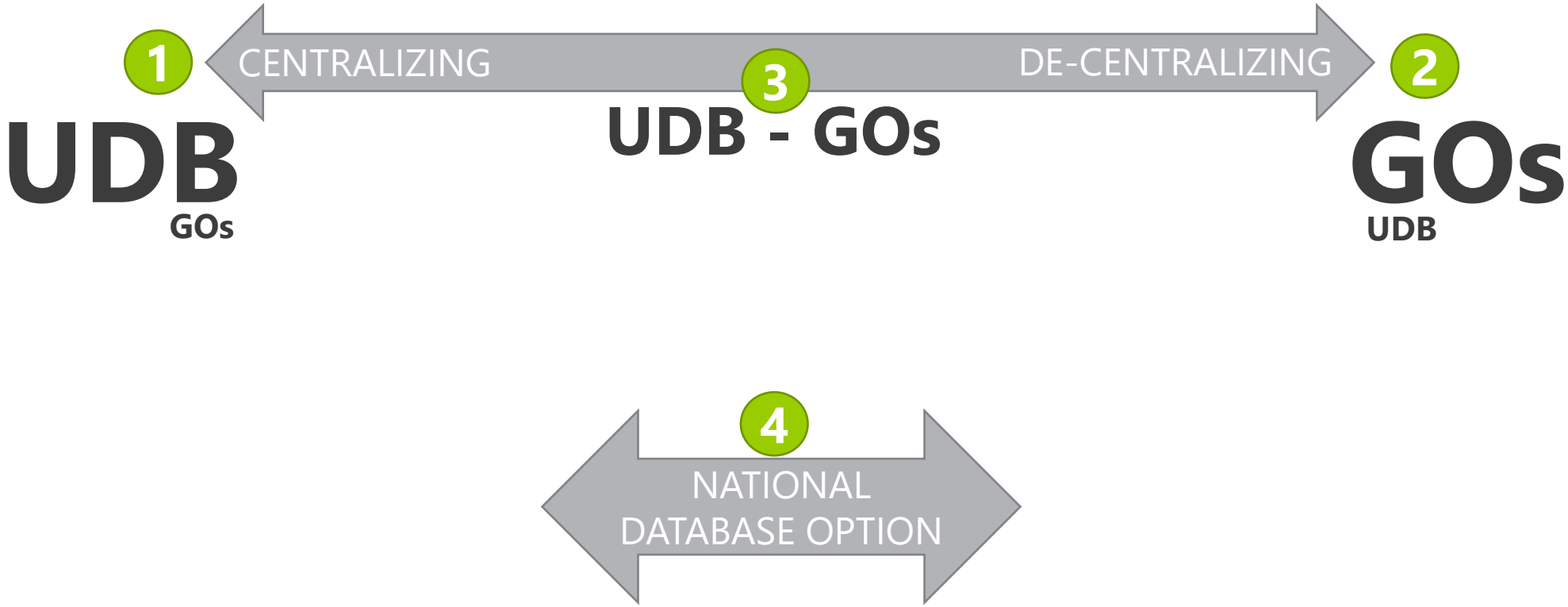
MS shall ensure that those are transferred to UDB at the moment when a consignment of renewable gas is registered in the UDB and

are cancelled after the consignment of renewable gas is withdrawn from the Union's interconnected gas infrastructure.

Such GOs once transferred, shall not be tradable outside the UDB"

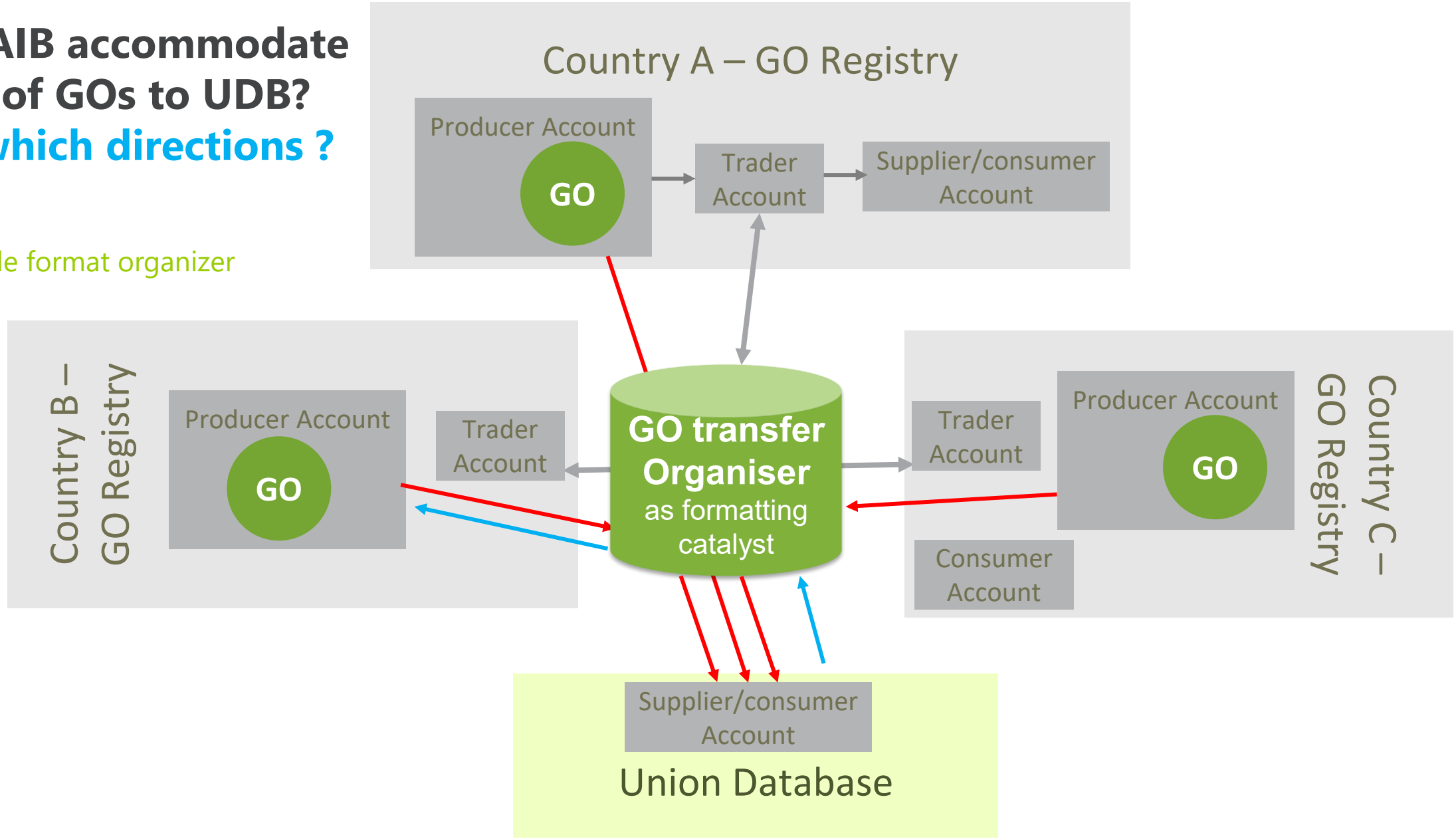
(REDIII Art. 31a§4)

Integration models



Should AIB accommodate transfer of GOs to UDB?
And in which directions ?

Hub as Single format organizer



Input needed For IT process design:

Where to cancel the GO ?

MS need to ensure GO are cancelled upon consumption of the gas while the PoS is validated in UDB

=> We need clarity on **where** the GO is cancelled after its transfer to UDB.

2 main options:

1. In UDB ?

- UDB informing consumption country,
- Regulations/ terms and conditions should then ensure that transfer to UDB implies a MS mandate to cancel the GO in the UDB

Or

2. In GO registry of consumption ?

- Exporting the GO from UDB to registry of consumption domain, with UDB instruction to cancel the GO
- The Cancelling economic operator needs an account in the GO registry of the country of consumption
- Handling cost ? Covered by cancellation fee?

Suggestion, for reducing overhead:

Where does the GO reside and where does it get cancelled (I, II): potential response:

Basic GO case: For cases where the PoS and the GO are registered in the UDB following separate processes, the UDB imports living GOs and facilitates the cancellation of GOs in a way that doesn't undermine member states' GO cancellation and disclosure framework. The GO resides "in" the UDB, where it gets cancelled at consumption of the gas.

GO-PoS National Database case: For cases where the PoS and the GO are registered in the UDB through a single process, the GO and PoS are jointly cancelled in the national registry and jointly registered in the UDB together with the consignment of renewable gas after cancellation of the GO+PoS in the national registry.

AIB is equipped for facilitating democratic evolution for reliable claims

Don't skip the GO

- It would
  - Cause double counting
  - Duplicate verification processes
  - Increase risk of error and fraud

Build on the GO

- Existing framework
- Existing experiences
- Trusted instrument
- Market facilitating

Information sharing

- Market activity statistics & an ongoing project to convert this section into a modern data analysis platform
- Residual mix calculation => enabling disclosure supervisory authorities
- Domain Protocols => clarifying detailed rules in member countries in standard template
- National restrictions overview => Survey results on conditions for trade, cancellation, expiry
- National disclosure rules => Data sheet GO and Disclosure
- National GO auctions
- Fees in the GO registries
- The EECS Standard
- Democratic and Transparent Decision making procedures

Disclosure Platform meeting
6 Nov in Brussels

- → For Disclosure Supervisory Authorities, legislators, issuing bodies of GOs, in AIB's geographical scope
- → Inspiration and conversation
- → Reach out to subscribe!

Info@aib-net.org

13:00	**1**	**Welcome**	**0:10**		
	1.1	Setting the scene of the Disclosure Platform Meeting under Chatham house rules			Maria Koulouvari, DAPEEP, GR
	1.2	Link with UBA's event on Disclosure on 7 November in Brussels			UBA
13:10	**2**	**Who-is-who**	**0:10**		
	2.1	Icebreaker			UBA
13:20	**3**	**Roundtable: Disclosure regulation status update**	**0:40**		
	3.1	Where does regulation stand in your country with regards to disclosure of the origin of consumed electricity and gas, and supervision of it			all
14:00	**4**	**Presentations**	**1:40**		
	4.1	Disclosure obligations			
	4.1.1	for gas and hydrogen suppliers		- to be transposed by August 2026 (Directive - EU - 2024/1788 - EN Art 16 & Annex 1§5 (CSRD-ESRS E1-5 & E1-6)	Katrien Verwimp, AIB
	4.1.2	for Corporates			Lukas Jany, UBA, DE
	4.1.3	relation with EU-ETS			
	4.1.4	CEN EN16325			
	4.2	Inspiration from REGADISS		REGADISS	Erwin Cornelis, Enunda
	4.3	Experiences with gas disclosure from specific countries			
	4.3.1	Gas Disclosure Supervision in Austria			Harald Poidl, E-Control, AT
	4.3.2	Gas consumption tracking in Estonia			River Tomera, ELERING, EE
	4.3.3	Draft gas disclosure rules in Germany			Lukas Jany, UBA, DE
	4.4	International fuel mix from multinational suppliers			Stephane Schweich, ILR, LU
	4.5	Evolutions in electricity: How supervising hourly matching on annual basis			
	4.6	Attention to the topic of Disclosure in CEER in 2026?			
	4.7	Union Database for gaseous biofuels, RFNBO, low-carbon gas: What is clear, what is yet to take shape?		Integration of Member states Database with	
16:00	**5**	**Roundtable: Identifying questions to be solved**	**1:00**		all
17:00	**6**	**Next steps**	**0:50**		
	6.1	Follow-up meeting of Disclosure Platform (when, what to discuss)			
	6.2	What else?			
17:50	**7**	**Conclusions**	**0:10**		
18:00		**CLOSE**			

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