

03.06.2013

This questionnaire has been developed by the CA-RES WorkingGroup 10 (on Guarantees of Origin)

It contains about 50 questions and it's purpose is twofold:

To start with it contains 50 important questions to be asked when designing a coherent GO-system, connected in a proper way to electricity disclosure. We recommend basic implementers use these questions to make sure the design of their national system does not contain any loopholes.

Furthermore it is aimed at providing member states with an outline on how to assess the GO system and disclosure of *other* member states. Answers to this questionnaire should be provided before any import of Guarantee of Origin should be considered as full transparency must be provided about operations relating to GO and disclosure (c.f. Art. 15 RES Directive).

General comment: links to relevant legal documents and to websites should be included in this document where possible. Also form templates used in your domain e.g. for applications can be attached.

General Contact Information	Member state response
Country	<i>Bulgaria</i>
Name and type of the Competent Body for running the GO system(e.g. TSO, NRA, Market Operator, Government Agency)	<i>Sustainable Energy Development Agency (SEDA) is a legal entity at state budget support with headquarters in Sofia and has the status of an executive agency within the Ministry of Energy.</i> <u>Government Agency</u>
a. <i>Geographic domain(country or region)</i>	<i>Bulgaria</i>
b. <i>Including offshore? (Y/N)</i>	<i>N</i>
c. <i>Date this GO- registry became legally operational:</i>	<i>01.01.2012</i>

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d. Address	1000, Sofia, 37 Ekzarh Yosif Str. – Headquarters of SEDA https://portal.seea.government.bg/ - electronic administrative services portal
e. Contact person	Mr. Ivan Pelov – Pelov@seea.government.bg Mr. Nikola Tsankov – tsankov@seea.government.bg Mrs. Mariana Lipcheva - Lipcheva@seea.government.bg;
If the competent body is not the issuing body, and did delegate or mandate the daily operational business to issue GO, please do specify the contact details of the issuing body and please provide proof of appointment to issue these certificates. (Reference to regulation or formal letter of appointment)	N/A
Transfer to other registries since / or planned to become operational by:	Transfers to Hungary since 06 Feb 2015. Responsible authority in Hungary is The Hungarian Energy and Public Utility Regulatory Authority (HEA).
Previous Issuing Body(ies)	Former State Energy and Water Regulatory Commission (now Energy and Water Regulatory Commission - EWRC)
a. Operative from - to	2009 - 2011
Responsible organisation for disclosure (to be filled out only if not identical to	Responsibilities are spread in different organisations. Obligated for publishing once a year are utility companies by license conditions. Information is provided by "public electricity provider" - governmental National Electrical Company (NEC). License

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the Competent Body for GO above)	<p><i>conditions are controlled by EWRC /Electricity and Water Regulatory Commission/. SEDA provides information about GO's to EWRC.</i></p> <p><i>Electrical energy providers once a year include information in the energy bill of the final consumers and/or publish this information on the internet page. Information is provided by the National Electrical Company EAD.</i></p>
a. Address	N/A
b. Contact person	N/A
Web link Internet pages (general info page) to the responsible bodies for issuing GO and disclosure.	<p>https://seea.government.bg/en/ - SEDA – issuing body</p> <p>https://www.nek.bg/index.php/en/ - National Electrical Company EAD – disclosure responsibilities</p> <p>http://www.dker.bg/en/home - EWRC – disclosure responsibilities</p>

Criteria / Question	Information	Member state response
Implementation of Art. 3 (9) of the Directive 2009/72/EC (on electricity disclosure) by the Member State		
1) Are disclosure laws and procedures in place? (Y/N) <i>If not: please state, when it is intended to have the national framework in place and move to question 8 below.</i>		Y

Criteria / Question	Information	Member state response
<p>a. <i>What are the laws and regulations?</i></p>	<p><i>Reference and detailed description, particularly including the linkage between GO and disclosure</i></p>	<p>1. <i>Energy Act; Ordinance №3 for licensing activities in the energy;</i> <i>The EA provides the general legal framework on licensing, production, transfer and supply in regard to energy</i> <i>The Ordinance provides the exact details in terms of administrative and technical procedures in regard to licensing activities in the energy sector;</i></p> <p>2. <i>Renewable Energy Act; Ordinance № RD-16-1117 for issuing, transfer and cancellation of GO's</i> <i>The REA provides the general legal framework on the status of GO's, whereas the Ordinance provides the exact details in terms of administrative and technical procedures in regard to issuing, transfer and cancellation of those GO's.</i></p>
<p>b. <i>When did the regulation(s) regarding disclosure come into force? If not when will they become effective?</i></p>		<p><i>from 05.04.2013</i></p>
<p>c. <i>Who is the responsible body for disclosure?</i></p>		<p><i>Responsibilities are spread in different organisations. Obligated for publishing once a year are utility companies by license conditions. Information is provided by "public electricity provider" - governmental National Electrical Company (NEC). License conditions are controlled by EWRC /Electricity and Water Regulatory Commission/. SEDA provides information about GO's to EWRC.</i></p>

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2) How is electricity of renewable energy disclosed? Which tracking system(s) can be applied?	<i>Describe</i>	<i>Electrical energy providers once a year include information in the energy bill of the final consumers and/or publish this information on the internet page. Information is provided by the National Electrical Company EAD.</i>
3) Is the amount of energy corresponding to GOs transferred by an electricity supplier to a third party deducted from the share of energy in its energy mix for the purposes of disclosure? (Art. 15 (8) 2009/28/EC)	<i>Describe and Reference</i>	<i>Yes. Until August 2018, providing GO's directly to a third party was not possible, as GO's followed the energy. Only exported energy was deducted, and then the GO's were cancelled. After amendment of the Energy Act in July 2018, GO's not receiving price support can be transferred and they will be deducted from the account of the supplier.</i>
4) In some countries domestic GOs or certificates different from RL 2009/28/EC GOs are being used. Does this concept exist within your country and do you treat them differently when it comes to disclosure – if so, how?	<i>Describe</i>	N
5) Do you apply the RE-DISS residual mix calculations for untracked electricity? If not how is electricity of unknown origin disclosed?	<i>Describe; preferably use a written formula</i>	<i>No. Production mix from which all RES are filtered out and is used for implicit disclosure.</i>
6) Who is responsible to calculate the residual mix?		<i>Public electrical energy provider</i>

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7) Do you apply the RE-DISS recommendations on deadlines within the disclosure process mentioned hereafter (Y/N) if not: What are the deadlines for this step in the disclosure process?		Y
a. <i>Deadline for cancellation of GOs</i>		Y. <i>Cancellation is a process: Two weeks after application for transfer to a final consumer, or after export. At the time of providing data from the public electrical energy provider all applications and transfers for the previous month are executed.</i>
b. <i>Date when the residual mix will be published</i>		N/A
c. <i>Publication of the fuel mix of the previous year by supplier</i>		Y
The issuing member state has implemented Art. 15 of the Directive 2009/28/EC		
8) On what legal basis is Art. 15 of the RES Directive implemented? What are the laws and regulations?	<p><i>Reference and detailed description</i></p> <p><i>(meaning web link or pdf) of law AND applicable regulations or by-laws. Preferably also with guidance on which articles do apply.</i></p>	<p><i>Energy from Renewable Sources Act: https://www.seea.government.bg/documents/LERS.pdf;</i></p> <p><i>Ordinance № RD-16-1117 for issuing, transfer and cancellation of GO's https://www.seea.government.bg/documents/NAREDBA_RD161117_ot_14102011_09_06_2015.pdf (only available in Bulgarian)</i></p>

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Criteria / Question	Information	Member state response
<i>a. From which production date did the national GO fulfil all criteria of Directive 2009/28? (Or when is it planned to have this framework in place?)</i>		01.01.2012
<i>b. If applicable: Which requirements have not yet been implemented?</i>		N/A

Criteria / Question	Information	Member state response
<p>9) What is the procedure for issuing a GO? (Art. 15 (2) 2009/28/EC)</p>	<p><i>Describe the process how a production device will be registered and in which way the production data will be collected. Please elaborate on the question in which way there is an independent check or audit on this information and by whom.</i></p>	<p>Remark: Regulations of the activities in the energy, water supply and sewerage sectors are carried out by the EWRC /Electricity and Water Regulatory Commission/, hereinafter referred to as "the Commission".</p> <p>The structure and the operation of the electricity system is carried out in accordance with the standards stipulated in the rules for measuring the quantity of electricity, regulating the principles of measurement, the ways and places of measurement, including the order and methods of recalculating the quantity of electricity in the ascertainment of unmeasured, wrongly and / or incorrectly measured electricity energy, or for which readings are measured in a non-visualized register of the merchant measurement tool, as well as the creation, maintenance and access to databases registered by these tools. The rules shall be adopted by the Commission on the proposal of the energy companies and shall be published by the energy companies and the Commission on their websites.</p> <p>After legal putting in operation, producers have the possibility to apply for GO's. With the first application they should provide all necessary information acc. Directive 2009/28/EC for the ownership, the site and technology and documents for approval of this information. After verifying the information provided in the request, SEDA issues the guarantee of origin, which will be an entry on the account of the installation, with a unique identification code, and with all information requested on the Directive 2009/28/EC. With the following requests they provide only the measuring protocols signed by the distributing company.</p>

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Criteria / Question	Information	Member state response
10) What is the regulation for the expiry and “use” of certificates as stated in article 15(3) of the RES Directive 2009/28/EC?	<i>Describe and Specify (please elaborate especially on the definition of production period – month, calendar month, year, etc?)</i>	<i>Acc. Art. 8, paragraph 5 of Ordinance № RD-16-1117, a GO is valid for 12 calendar months after the month of the production of the energy. The filed GO applications concern the amount of the produced energy in one calendar month. Exception is implemented for producers with less than 30 kW installed capacity - up to 10 months. Acc. paragraph 3 in the same Ordinance GO is used only for approval of the amount of renewable energy delivered to the final consumers.</i>
11) Is the appointed competent body the only competent body in your country? (Art. 15 (4) 2009/28/EC)		Y
a. <i>If there is more than one, how are responsibilities separated from each other and/or how are geographic regions defined?</i>		N/A
12) If the daily operations have been handed over to another body do you supervise the issuance, transfer and cancellation of GO? (Art. 15 (4) 2009/28/EC)	<i>Please explain: how is it done? What kind of measures have been taken and by whom (e.g. competent body, regulator)?</i>	N/A
13) Ownership and type of organisation of the issuing body (e.g. private company, government department, energy regulator, TSO)	Owner & type	<u>Government Agency</u>

Criteria / Question	Information	Member state response
<p>a. <i>Is the company independent of production, trade or supply activities? (Art. 15 (4) 2009/28/EC)</i></p>		Y
<p>The issuing member state ensures that</p> <p>no more than one GO is issued in respect of each unit of energy produced and</p> <p>that the same unit of energy from renewable sources is taken into account only once (Art. 15 (2) 2009/28/EC).</p>		
<p>14) What kind of GOs can be used for disclosure and in what way?</p>	<p><i>Describe; e.g. relationship between CHP-GO and RES-GO</i></p>	<p><i>There are two different supporting mechanisms in the country. In general one is for renewable electricity including CHP technology from renewable sources in form of the feed-in-tariff or feed-in-premium. Producers receive RES-GO's. For high efficient cogeneration (from all sources) they receive certificates from EWRC and can not apply for GO's and vice versa.</i></p>
<p>a. <i>If there are more than one, what kind of measures have you taken to prevent multiple issuance of GO for the same amount of energy?</i></p>	<p><i>Describe</i></p>	<p><i>Two different mechanisms for support. Regular information from SEDA to EWRC from the GO's registry. SEDA collects also information from the public provider and distribution companies. For both mechanisms support is through the "Security of the energy system" fund and fund checks payments to the producers.</i></p>

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15) Can renewable energy be disclosed in any other way than using GOs (e.g. bilateral contracts or other types of certificates, like industry based schemes)?		N
a. <i>If so, what kind of measures have you taken to ensure that the same unit of energy is taken into account only once?</i>		N/A
16) Do other registry systems in your domain exist which can be used for disclosure purposes (e.g. private certificate schemes)?		N
a. <i>If so, how do you align the databases?</i>		N/A
17) What technical measures have you taken to prevent double counting of GOs?	<i>Describe</i>	<i>There is only one register and only one issuing body in the country. The ID-numbers of the GO's are unique. In the system are automatic restrictions for issuing GO's for the one account and one period twice.</i>
18) When importing GOs: What measures have you taken to ensure that exported GO are not used anymore in the exporting or any other state?	<i>Specify</i>	<i>There are no requests for import in Bulgaria. In case of a request, SEDA will communicate with the issuing body in the MS of export.</i>

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19) Have exported and cancelled quantities of electricity been deducted from the residual mix?		Y
The issuing member state ensures the function of GO (Art. 15 (2) 2009/28/EC).		
20) Are GOs only being used for disclosure? (Y/N)	<i>If no, please specify some more by answering the questions below</i>	Y
a. <i>What type(s) of support scheme(s) are in place?</i>	<i>Please describe the support schemes that have been notified to the commission and that can be applicable to producers of renewable energy</i>	<i>Feed-in-tariffs approved by EWRC acc. Energy from Renewable Sources Act</i>
b. <i>Are GOs also used as a proof for national support schemes?</i>		Y
c. <i>Do GOs have any other function within the scope of the national support scheme?</i>		N
d. <i>How do these support and disclosure schemes inter-relate?</i>	<i>Describe (e.g. how supported electricity is disclosed)</i>	N/A
The Registry system is electronic, accurate, reliable and fraud-resistant (Art. 15 (5) 2009/28/EC).		

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21) Do you have an electronic registry?		Y
a. If so, who developed & operates it?	<i>Identity of developer and operator</i>	<i>Registry is developed by a private company within the project and technical specification framework by SEDA. SEDA is the sole operator.</i>
b. What technology (e.g. database, spreadsheet)?		<i>Database</i>
22) Do you issue, transfer and cancel GOs for the standard size of 1 MWh?	<i>Please also specify if there are any exceptions to the general rule.</i>	Y
23) Are the EECS-Rules implemented by the issuing body?		<i>Directive 2009/28/EC, Directive 2009/72/EC, and Directive 2012/27/EC are fully implemented</i>
24) What measures have you taken to ensure sufficient IT-security?	<i>Describe and specify. Please elaborate especially on the way to get access to accounts (fraud resistance)</i>	<i>Access to the registry accounts is possible through username and password or with classified electronic signature. Application for issuing or transfer should be signed with electronic signature. Database is compliant with demanding IT security standards.</i>
25) What measures have you taken to ensure validity of the GO content?	<i>Describe (e.g. electricity is only measured by gauged electric meter; audits of production data, onsite inspections)</i>	<i>Produced electricity is measured by the certified meters of the distributing company. SEDA experts conduct onsite inspection according to a preliminary plan.</i>

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26) What measures have you taken to ensure that only one GO is issued for each unit of energy produced?	<i>Describe</i>	<i>There is only one register and only one issuing body in the country. Each and every application for GO's is accompanied by e official document for produced electricity measured by a certified meter. Also each producer is checked for consistency in terms of declared installed production capacity, measured production and quantity applied for GO's.</i>
27) Do you have written procedures for operating your GO system? If so, please specify.		<i>Procedure is according Ordinance RD-16-1117/ 14.10.2011 and internal rules of SEDA</i>
28) What measures have you taken (or would you be prepared to take):		
a. <i>to limit financial risk to other issuing bodies as a result of (e.g. trading disputes between accountholders)?</i>		<i>N/A. GO's registry is not a trading platform.</i>
b. <i>to limit fraudulent behaviour? (e.g. multiple issuing, transfer and cancellation – for example, inspection of plant)</i>		<i>See answers #17, 24, 25, 26.</i>
29) Which parts of your operations are (or might be) outsourced, and to whom?	<i>Specify</i>	<i>N/A</i>

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30) Do you (plan to) issue separate GOs for domestic and international markets? If so, how are these related and how do you prevent double counting?		N
31) Can certificates be altered once they have been issued? If yes, how, and in what circumstances?		<i>They can be corrected only by the operator of the registry if they contain technical inaccuracy .</i>
32) Please describe the regulation for metering of electricity production for issuing of GO in your domain.	<i>Describe, including information on the authorised measurement body, way of provision of meter readings, estimation and profiling, as well as measurement of input/output for combustion fuels</i>	<i>Every month with the request producers provide protocol from the commercial measuring unit signed by the distributing company. For the technologies that use limited amount of fossil fuels is requested additional information for amount of used fuel. For the amount of electricity produced from fossil fuel (deducted from the whole amount) GO's are not issued.</i>
c. Do you issue on any basis other than meter readings?	<i>Describe (if "yes")</i>	N
d. Do you issue certificates for nett or gross output?		<i>Net output</i>
e. If you issue for gross output, how do you handle onsite demand, pumped storage and auxiliaries?	<i>Describe</i>	N/A
f. How do you handle the situation that only one meter provides production data for more than one plant?	<i>Describe (e.g. an accredited organisation to differentiate, a formula by the plant operator, a pro rata)</i>	N/A

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33) How do you issue GO for biomass plants (100% biomass)?	<i>Describe and explain</i>	<i>GO's from Biomass are not treated differently compared to any other eligible RES</i>
34) How do you issue certificates for co firing plants and on what basis do you allocate biomass?	<i>Describe and explain (e.g. we use a formula to calculate biomass percentage, there will be an audit etc)</i>	N/A
34a) How do you issue certificates for waste incinerators and on what basis do you allocate waste (biomass)?	<i>Describe and explain</i>	N/A
35) What are the production periods for production devices in your domain? Are there any exceptions?	<i>Specify (e.g. "monthly but for small scale PV which will be issued yearly")</i>	<i>Production period is a calendar month for producers over 30 kW and could be up to 10 months for producers with 30 kW or less installed power if the standard size of 1 MWh has not been reached.</i>
36) How often do you issue GOs?		<i>Monthly</i>
37) What are the procedures regarding backward issuing?	<i>Describe</i>	<i>Backward issuing is effectively limited by expiration rule.</i>
38) How are production device registrations verified in your domain?	<i>Specify, Including process, verified documents and list of registered parameters</i>	<i>With the first application they should provide all necessary information acc. Art. 15 par. 6 of the Directive 2009/28/EC for the ownership, the site and technology and documents for approval of this information.</i>

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39) What is the frequency and process with which production devices are inspected in your domain?	<i>Describe, including conduct of audits/ad-hoc audits, criteria for selection of auditor scope of audit, process for addressing corrective action</i>	<i>Site visits according to year plan on a random way, if more information is needed or for check-ups of declared data.</i>
40) How do you handle errors within registered information and within GOs?	<i>Describe and specify for the categories metering errors, resettlements and other errors.</i>	<i>Legislation on metering establishes specific time windows and deadlines for measurement protocols and possible amendments. Application follows this time windows. When technical errors occur they are corrected in the registry by SEDA.</i>
41) Within your domain, do certificates always expire within 12 months of the end of the production period? (Note that expired means something else than cancelled.)		Y
a. <i>If not, when do they expire?</i>	<i>Specify</i>	N/A
b. <i>What happens with expired certificates?</i>		<i>They are assigned "inactive" status in the database.</i>
Issued GOs include the minimum content (Art. 15 (6) 2009/28/EC)		
42) Energy source from which the energy was produced		Y
43) The start and end dates of production		Y
44) Electricity; heating or cooling		Y

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45) Identification number, location, type and capacity of the installation		Y
46) Investment support	<i>Yes/ no, type and scope</i>	Y
47) Funding by any support scheme	<i>Yes/ no, type and scope (including all the support schemes that have been notified to the commission and that can be applicable to producers of renewable energy.)</i>	Y
48) Date when installation became operational		Y
49) Date of issue		Y
50) Issuing State		Y
51) Unique Identification number of GO		Y

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52) Do you use additional information on GOs like labels or additional info on the sustainability of biomass? What measures have you taken to ensure the reliability of the additional information and do you want this information to be transferred between national registries?	<i>Describe and specify</i>	N/A
Additional Questions		
53) Are you a member of AIB? Or do you plan a membership of AIB, or to use the Hub without AIB membership?	<i>Membership or Use of Hub</i>	<i>Currently SEDA is not a member of the AIB. Preparations are underway in regard to achieving membership.</i>