

CEER Public Consultation on 2013 Work Programme

Response from: Association of Issuing Bodies (the AIB)

Dear Ms. McCoy,

The members of the Association of Issuing Bodies (the AIB) are mostly competent bodies appointed by member states to administer national guarantee of origin (GO) schemes, principally for renewable and cogeneration electricity. Some of these are members of CEER, including: E-Control (Austria), VREG, CWaPE and Brugel (Belgium), ILR (Luxembourg) and the Slovenian Energy Agency.

Since its foundation in 2002, the AIB has developed and operated an international system, known as the European Energy Certificate System (EECS). To date, consumers have been provided with proof of the source of more than 1,000 TWh of electricity - further details of the recent activity of the AIB can be found on our website, at http://www.aib-net.org/portal/page/portal/AIB_HOME/NEWSEVENTS/Newsletter%2016%20-%20corrected.pdf. Over the last decade, the AIB has supported the European Commission in the development of both RES and cogeneration GOs, and discussions with the Concerted Action on the Renewable Energy Sources Directive (CA-RES) will shortly commence.

The AIB welcomes the opportunity offered by the ongoing consultation regarding the CEER 2012 work programme to stress the importance of GOs, and of their proper use in disclosure systems, to a well-functioning competitive Internal Energy Market; and to consumers - who require full transparency concerning the source of the electricity that they consume.

The AIB supports these objectives by providing a reliable and accurate means of informing European electricity consumers of the origin of their electricity. It does so by harmonising national GO schemes and coordinating the international transfer of energy certificates (in support of the RES Directive 2009/28/EC); and working to implement good practices in electricity source disclosure, as required of all European suppliers of electricity by Article 3(9) of the Internal Energy Market Directive 2009/72/EC. This is vital if the renewable energy market is to continue growing and remain healthy and orderly. In doing so, AIB works with projects such as the current E-TRACK (www.e-track-project.org) and RE-DISS (www.reliable-disclosure.org) projects, and their possible successors, and we would urge CEER to consider the results and discussions on these projects, in order to promote the creation of a level playing field based on best practice through coordinated national regulations.

While we applaud the position of CEER in placing customer rights and empowerment at the heart of its priorities for 2013, we are disappointed to see that initiatives relating to harmonisation of energy source disclosure practices are absent from the 2013 work programme. Harmonisation and regulatory control are vital if disclosure methodologies are to be internationally consistent, and failure to address this issue can only damage the internal electricity market.

The absence of initiatives aimed at harmonising national practices at a moment when many member states are forming their disclosure policy seem to us a wasted opportunity, and we urge the CEER Customer Working Group to include harmonisation of disclosure practices within its work programme.

The AIB would be pleased to discuss further with the CEER Customer Working Group the inclusion of disclosure in the final CEER 2013 Work Programme.

Kind regards,
Phil Moody
Secretary General
Association of Issuing Bodies