

# It's time we talk about double claiming

Valuing  
consumer  
action

# veyt

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# Agenda

1. Lack of legal definitions
2. Addressing end-user claims
3. Inconsistency in EU and Member States legislation

## GO use has expanded from...

- mandatory energy disclosure to
- greenhouse gas accounting (mandatory & voluntary).

## Elephant in the room: double claiming

**Double counting** – the same unit of energy is taken into account only once.

**Double disclosure** – RES energy in relation to which the accompanying GO has been sold separately by the producer should not be disclosed/sold to the final consumer as RES energy.

**Double claiming** – ?

**Double issuance** – where more than one GO is used for the same unit of energy.

## The market needs to understand the terminology

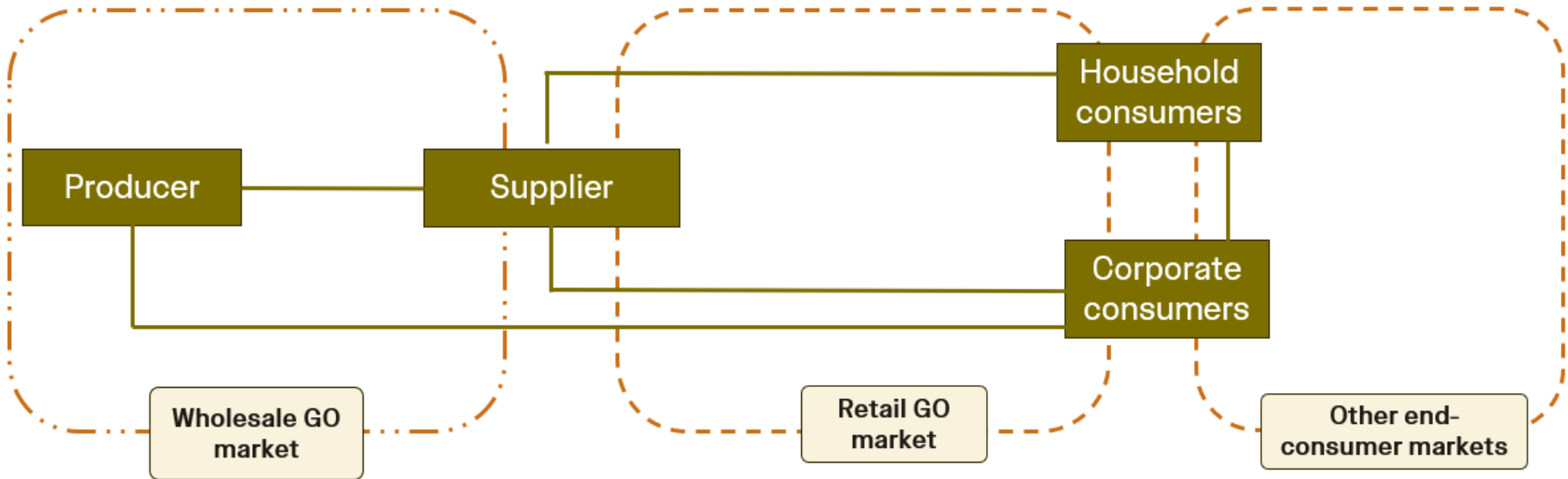
	Renewable Energy Directive	EECS rules
Defined	Double counting (Art. 19 para 2)	
Referred to	Double disclosure (Recital 55)	Double counting (N 9.1.1)
	Double claiming (in respect to renewable gas in the Union Database) (Recital 89)	Double issuance (A2.1.2)

Competition law

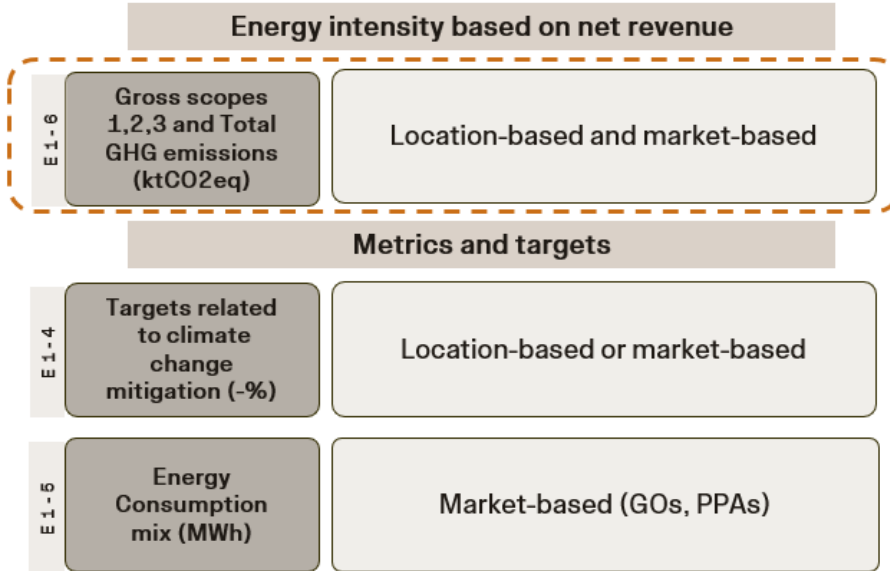
Corporate Sustainability Reporting Directive

Renewable Energy Directive, Internal Electricity Market Directive & EECS rules

Green Claims Directive



### European Sustainability Reporting Standard

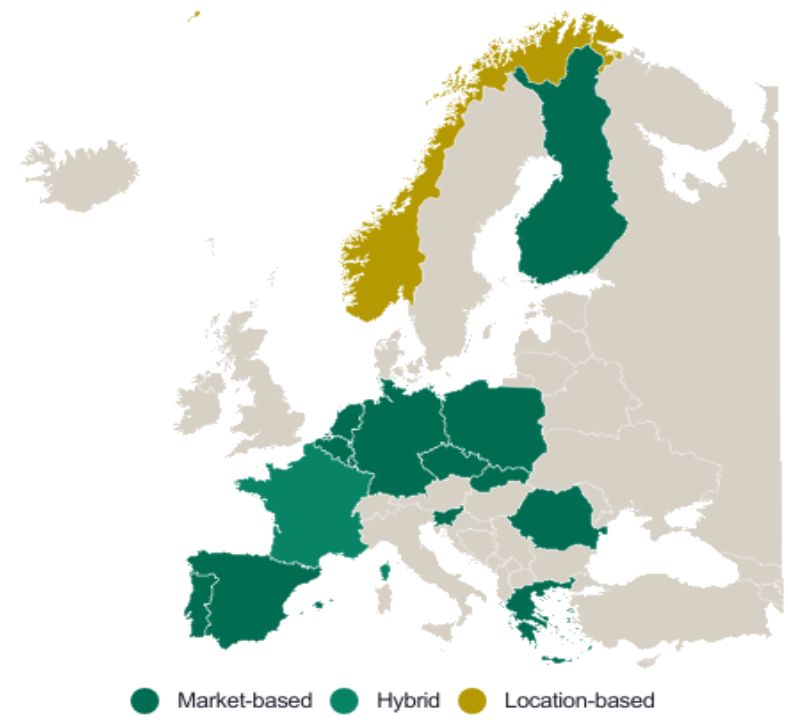


Source: Veyt

### Taxonomy Climate Delegated Act

Sector	Carbon emission intensity threshold	GHG accounting method
Aluminum	≤1,484 tCO2e per tonne	Unspecified
Cement	≤0,722 tCO2e per tonne	Unspecified
Low - carbon technologies	N/A	Environmental Footprint

Source: European Commission



To minimise risks (uncertainty of rules) and support demand and liquidity, policy-makers should:

1. Define double claiming;
2. Delineate responsibility for double claims: companies in the retail power market should not be “free-riding” on renewable energy consumption claims.
3. Harmonise EU laws to minimise double claiming so that the application of the market-based and EF methods is streamlined.