



EECS
Domain Protocol

for
Germany

Prepared by UBA

Based on EECS Rules Release 7 v14

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EECS Domain Protocol

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1	
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EECS Domain Protocol

A Introduction

This Domain Protocol describes how the EECS Standard has been implemented in a certain Domain (country/region) for a certain type of energy certificate and it indicates where that system deviates from that standard. The EECS framework including the Domain Protocol aims to ensure robustness and transparency for all parties involved.

A Domain Protocol promotes quality and clarity, as it:

- explains local rules;
- provides clear information to all stakeholders (consumers, market parties, other members, government, the EU Commission etc.);
- facilitates assessment of compliance and permissible deviation from the EECS Rules;
- facilitates audit; and
- translates local rules into a single format and language, supporting each of the above.

Important contact information is provided in Annex 1.

B General

B.1 Scope

This section demonstrates compliance with the following EECS Rules:

C3.1.1	E6.2.1a	E6.3.1	E6.3.2	N2.1.1	O.2.1.1	
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B.1.1. This Domain Protocol sets out the procedures, rights and obligations, which apply to the Domain of Germany and relate to the EECS Electricity Scheme as defined in the EECS Rules.

B.1.2. Production Device qualification for this Domain will be determined such, that the Production Device is effectively located in Germany.

- The borders of the Domain are determined as follows: Borders of the Federal Republic of Germany including the exclusive economic zone
- Production devices located at the border of the Domain are handled as follows: According to Section 21 subsection 2HkRNDV and Section 14 HkRNDV devices that have a state contract are treated in accordance with the content of this contract. Power plants located at the border that do not have such a contract are assigned to the German domain to the extent that the electricity-generating parts of the plant are located on German soil and have a connection to a German grid that is managed by an Authorised Measurement Body.

B.1.3. UBA is authorised to issue EECS Certificates relating to the following EECS Product(s):

- EECS GO

B.1.4. UBA is authorised to issue EECS Certificates relating to the following EECS Product Type(s):

- Renewable Electricity
- UBA is mandated by Section 79 Renewable Energy Sources Act (Erneuerbare-Energien-Gesetz - EEG 2021) and Section 9 Renewable Energy



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Sources Ordinance (Erneuerbare-Energien-Verordnung - EEG) to issue electricity GOs for Renewable High-Efficiency Cogeneration

- B.1.5. UBA is authorised to issue EECS Certificates relating to the following energy carriers: electricity and the following energy sources: renewable energy sources including biomass.
- B.1.6. UBA is authorised to issue the following types of energy certificates outside of the EECS Framework: Guarantees of regional origin.
- The following parts of this Domain Protocol **do not apply** for these non-EECS certificates: complete

B.2 Status and Interpretation

This section demonstrates compliance with the following EECS Rules:

E6.2.1d	E6.3.1	E6.3.4				
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- B.2.1. The EECS Rules are subsidiary and supplementary to national legislation.
- B.2.2. The EECS Rules and its subsidiary documents are implemented in Germany in the manner described in this Domain Protocol. Any deviations from the provisions of the EECS Rules that may have material effect are set out in section C.5 of this document.
- B.2.3. The capitalised terms used in this Domain Protocol shall have the meanings ascribed to them in the [EECS Rules](#) except as stated in section C.5 of this document.
- B.2.4. This Domain Protocol is made contractually binding between any EECS Market Participant and UBA by national legislation, especially the GO and Regional GO Implementing Ordinance (Herkunfts- und Regionalnachweis-Durchführungsverordnung – HkRNDV). An English translation of the GO and Regional GO Implementing Ordinance is not available.

There are no contracts between UBA and EECS Market Participants and no STCs. Legal relationship is determined by law. Therefore, the DP itself is not made binding between UBA and our users. However, indirectly it is effective towards our users because we align the legal foundations of our work and our administrative practice with the requirements laid down in the EECS Rules. If such alignment is not feasible a deviation from the EECS Rules will be notified under Section C.5 of this DP.

Concerning liability Article 34 of the German Basic Law (http://www.gesetze-im-internet.de/englisch_gg/index.html) is applicable.

- B.2.5. In the event of a dispute, the approved English version of this Domain Protocol will take precedence over a local language version.

B.3 Roles and Responsibilities

This section demonstrates compliance with the following EECS Rules:

C3.1.1	E6.2.1c					
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B.3.1. The Authorised Issuing Body for EECS GOs in Germany is UBA. Its role is to administer the EECS Registration Database and its interface with the EECS Transfer System.

B.3.2. The Competent Authority for Guarantees of origin (GO) under a legislative framework in Germany is UBA. Its role is defined by legislation.

Founded in 1974, UBA is Germany's central federal authority on environmental matters. It is a scientific environmental authority under the jurisdiction of the Federal Ministry for the Environment, Nature Conservation, and Nuclear Safety, responsible for the most diverse range of topics. HKNR is under the jurisdiction of the Federal Ministry of Economic Affairs and Climate Action.

The interim period for handling GO for RES-E production before end of 2012 ended on 31st December 2013. By that date, Öko-Institut has resigned as Authorised Issuing Body for EECS-GOs.

UBA operates an electronic database (as regulated by law), called the Herkunftsnachweisregister, HKNR.

All procedures within the HKNR are regulated by the following laws, regulations and documents:

- the Renewable Energy Sources Ordinance (Erneuerbare-Energien-Verordnung - EEG)

http://www.gesetze-im-internet.de/ausglmechv_2015/BJNR014610015.html (in German only),

- the GO and Regional GO Implementing Ordinance (HkRNDV)

<http://www.gesetze-im-internet.de/hkrndv/BJNR185310018.html> (in German only)

An English translation of the current GO and Regional GO Implementing Ordinance is not yet available.

- the GO and Regional GO Fees Ordinance (HkRNGebV)

<http://www.gesetze-im-internet.de/hkngbev/BJNR270300012.html> (in German only)

An English translation of the GO and Regional GO Fees Ordinance is not available,

and the Terms of Use (Nutzungsbedingungen)

<https://www.umweltbundesamt.de/dokument/downloads-nutzungsbedingungen-fuer> (in German only).

UBA is bound to these rules and cannot act against them.

B.3.3. The Authorised Measurement Body are listed on the website <https://bdew-codes.de/Codenumbers/ElectricityGridOperatorCodes>. They are the bodies established under national regulation to be responsible for the collection



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and validation of measured volumes of energy used in national financial settlement processes.

B.3.4. Contact details for the principal roles and Issuing Body agents are given in Annex 1.

B.3.5. The EECS Registration Database operated by UBA can be accessed via the website www.hknr.de.

B.3.6. No NGC exists in Germany.

B.3.7. No Independent Criteria Scheme combinations can be Issued under this Domain Protocol:

B.4 Issuance scope summary

B.4.1. In summary, UBA is authorised to Issue the following types of energy certificates:

Issuing Body issues certificates for:		Electricity		
		ProductType	Source	Technology (= High-Efficiency Cogeneration)
EECS GO	Energy source	Hydro	+	
		Solar	+	
		Wind	+	
		Biomass	+	+
		Geothermal	+	
		Landfill & sewage treatment plant gas	+	
		Tidal/wave/other ocean energy	+	
		Ambient energy		
		Fossil		
		Nuclear		
National GO (non-EECS*)		none		
EECS Support Certificate		none		
EECS NGC (name)				
National certificate other than GO (non-EECS*)		Guarantee of regional origin issued for supported renewable energy	See EECS GO	

(*) Non-EECS certificates may not be transferred over the AIB hub.



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C Overview of National Legal and Regulatory Framework

C.1 The EECS Framework

This section demonstrates compliance with the following EECS Rules:

D3.1.2	E6.2.1b	E6.2.1d	N8	O.10		
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C.1.1. For this Domain, the relevant local enabling legislation is as follows:

The German legislator implemented the requirements of Article 15 of the Directive 2009/28/EC by Section 55 of the Renewable Energy Sources Act 2012 (Erneuerbare-Energien-Gesetz, EEG 2012). Section 55 EEG 2012 had been superseded by Section 79 EEG 2014, Section 79 EEG 2017 and Section 79 EEG 2021

EEG 2012: <https://www.clearingstelle-eeg-kwkg.de/eeg2012>

EEG: 2014: <https://www.bmwi.de/Redaktion/EN/Downloads/renewable-energy-sources-act-eeg-2014.html> (English version)

EEG 2017:: http://www.bmwi.de/Redaktion/EN/Downloads/E/eeg-2017-gesetz-en.pdf?__blob=publicationFile&v=2 (English version)

EEG 2021: https://www.gesetze-im-internet.de/eeg_2014/

Using Section 64d EEG 2012 (now Section 92 EEG 2021) the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety in 2012 enacted the GO Ordinance (HkNV). With effect of 1 January 2017 the regulatory content of the HkNV has been implemented into the Renewable Energy Sources Ordinance (Erneuerbare-Energien-Verordnung – EEV). It enables UBA to create further and detailed regulations.

UBA used this provision to enact the GO and Regional GO Implementing Ordinance (HkRNDV, <http://www.gesetze-im-internet.de/hkrndv/BJNR185310018.html> (German only)) and the GO and Regional GO Fees Ordinance (HkRNGebV, <http://www.gesetze-im-internet.de/hkngebv/BJNR270300012.html>).

On basis of the HkRNDV UBA enacted Terms of Use (Nutzungsbedingungen). UBA first published Terms of use according to Section 52 HkRNDV on 28 December 2018.

<https://www.umweltbundesamt.de/dokument/downloads-nutzungsbedingungen-fuer> (German only)

According to their legal basis (Section 52 sentence 1 HkRNDV), the Terms of Use contain detailed provisions how the obligations on users deriving from



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the HkRNDV are to be implemented in practice. The Terms of Use provide e.g. for rules on

- availability of the register and communication of documents (number 2)
- power of representation, PostIdent procedure and authentication by smsTan (number 3)
- registration of installations (number 4)
- additional information on the GO and Regional GO (number 5)
- authorization of service providers (number 6)
- determination of the biogenic fraction (number 7)
- passwords (number 8)
- technical malfunction (number 9)
- enter into force (number 10)

These legislative acts set the basis for UBA to administer the GO registry in Germany. All procedures have to be ruled or described in these documents. The most important document for the registry itself is the HkRNDV. It describes in very detail the preconditions and procedures for most of the activities within the registry.

In accordance with Section 79 EEG 2021 and Section 12 HkRNDV UBA may not issue a GO for electricity that receives a sort of direct support, i.e. the Feed-in-Tariff or the Market Premium

C.1.2. UBA has been properly appointed as an Authorised Issuing Body for EECS GOs under Section 79 EEG 2021 which states UBA:

- shall on application issue guarantees of origin to installation operators for electricity from renewable energy sources for which no payment pursuant to Section 19 EEG 2021 is claimed,
- shall on application transfer guarantees of origin and
- shall cancel guarantees of origin.”

C.2 National Energy Source Disclosure

This section demonstrates compliance with the following EECS Rules:

E3.3.14						
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C.2.1. For this Domain, the authorised body for supervision of Disclosure of the origin of energy towards consumers is Bundesnetzagentur (Federal Network Agency for Electricity, Gas, Telecommunications, Post and Railway - BNetzA). This body is responsible for supervision of disclosure of the origin of the following Energy Carriers: Renewable Electricity. The responsible authority to verify the disclosure for “other renewables” is UBA

(Section 42, subsection 7 Energy Industry Act - EnWG). “Other renewables” are the main component of green electricity products.

C.2.2 The legislation and regulation for disclosure are available on http://www.gesetze-im-internet.de/enwg_2005/index.html. The methodology and process for disclosure are as follows: Suppliers have to provide their electricity fuel mix for year X by 1 November of year X+1 the latest at the annual invoice, advertising material and on their website. Disclosed fuel mix contains the company’s mix, a product mix (if any, in these cases also the residual company mix) and (for comparison) the German production mix.

Disclosed information contains at least the shares of nuclear, coal, natural gas, other fossil, renewables as supported according to German Renewable Energy Sources Act (EEG), other renewables and the respective emissions of CO₂ and nuclear waste.

For shares of unknown origin, the German ENTSO-E mix published by the German Association of Energy and Water Industry (BDEW) has to be used, which shall be corrected “with reasonable effort” by BDEW and/or the suppliers in order to avoid double counting (Section 42 subsection 4EnWG). Electricity from renewable energy sources, which is disclosed as “supported by the Renewable Energy Sources Act” or “other renewable energy sources with GOs”, has to be subtracted beforehand. The adjusting “with reasonable effort” comprises everything to avoid double counting, including factoring in the number of imported, exported or expired GOs. BDEW calculates and publishes the adjusted ENTSO-E mix on a yearly basis for all electricity suppliers.

https://www.bdew.de/internet.nsf/id/DE_Datenplattform_Stromkennzeichnung

In order to disclose a certain share of “other renewables” – besides the amount of “renewables supported by the Renewable Energy Sources Act” which is calculated every year on legal basis (Section 78 EEG 2021) as a reliable tracking system and paid for by every consumer –, suppliers are obliged to use RES GO as cancelled in the HKNR. This obligation does not apply for RES as share of the corrected ENTSO-E mix.

All other shares of origin of electricity (nuclear, coal, gas, other fossil fuels, renewables supported by the Renewable Energy Sources Act) are disclosed in accordance with the BDEW guidelines.

The following renewable energy sources are regarded as renewables:

- hydropower including wave, tidal, salinity gradient and marine current energy,
- wind energy,
- solar radiation energy,
- geothermal energy,
- energy from biomass including biogas, biomethane, landfill gas and sewage treatment gas and from the biologically degradable part of waste from households and industry,

(Section 3 number 21 EEG 2021).

Electricity from these sources is eligible to be disclosed as “supported” or “other renewables” depending solely on the fact whether the electricity



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produced from these sources had been supported under the German renewables support scheme (which is laid down in the EEG).

UBA has the competence to check whether the supplier fulfils his duty to cancel the correct amount of GOs.

German electricity branch organisation BDEW has published voluntary guidelines with further specifications.

https://www.bdew.de/media/documents/210801_Leitfaden_Stromkennzeichnung_2021.pdf (in German only)

As corrected ENTSO-E mix, BDEW recommends in coordination with the German regulator Bundesnetzagentur (Federal Network Agency - BNetzA) the German production mix excluding all RES production. However, no legally mandatory mix is published.

The BDEW guidelines also include a mechanism for ex-post allocation of attributes as based on net trading balances of market parties. According to this methodology, larger German electricity companies publish their traded production mix, so that companies who are net buyers from these companies over the year can use this information for calculation of their own mix. Such calculation is performed with several iterative steps and presumably used by most of the German producers, traders and suppliers.

For explicit tracking, no requirements are put in place (besides the obligation for RES GO from 2013 production) so that besides EECS GO, for non-RES contract-based tracking may be used.

C.2.3 Cancellation for usage in another Domain (i.e. Ex Domain Cancellations) are not allowed

C.3 National Public Support Schemes

This section demonstrates compliance with the following EECS Rules:

None directly						
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C.3.1. The support schemes are defined by the German Renewable Energy Sources Act (Erneuerbare-Energien-Gesetz – EEG 2021). Support mechanisms include particularly a fixed feed-in-tariff or a market premium for the plant operator. In both cases no GOs are issued for these volumes as the respective RES volumes are disclosed on a pro-rata basis towards end-consumers as “renewables supported by the Renewable Energy Sources Act”. The calculation is described in every detail in EEG 2021 (https://www.gesetze-im-internet.de/eeg_2014/).

C.4 EECS Product Rules

This section demonstrates compliance with the following EECS Rules:

E6.2.1f	E6.2.1g					
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C.4.1. The EECS Product Rules as applied in Germany are set out within sections D and E of this document.

C.5 Local Deviations from the EECS Rules

C.5.1. In contrast to C2.1.2 the owner of a production device is not obligated to send UBA graphical representations of the production device and its location, including diagrams and photographs. All data is verified by the respective grid operator. The owner has to describe the location of the installation by using the coordinate system ETRS89/UTM (number 4 Terms of Use).

C.5.2. In contrast to D4.1.2 (xiv) the owner of a production device is not obliged to send a diagram. In all cases of a “complicated metering situation”, which means that several meters or import and export meters or transformers are used or the amount of energy at the meter does not reflect the amount fed into the grid due to other reasons (Section 21 subsection 1 sentence 2 number 10 HkRNDV), the grid operator distributes one “MaLo” ID that groups all metering points together.

C.5.3. In contrast to C3.4.1 (c) UBA issues GOs for production devices with SEP-meter (meter cannot be read automatically, and the grid operator sends the data every time a staff member reads the meter (Section 41 subsection 2 sentence 2 number 2 HkRNDV)). In such cases the production period is determined by the dates when the meter was read. The first day of the production period is the day after the last reading. The last day of the production period is the day of the recent reading (Section 17 subsection 3 HkRNDV). There is no breakdown of production per calendar month. Instead, on the GO the production period is expressed as the calendar month in which the production period ended (Section 17 subsection 1 HkRNDV). Theoretically it is in such cases possible that GOs are issued for RES-E produced over a period of more than 12 month but not significantly longer than this (Section 17 subsection 4 HkRNDV).

C.5.4. In contrast to C3.4.1 (b) and C3.4.1 (c) UBA issues GOs on request if the electricity was not produced more than twelve (12) months ago. As RED II doesn't determine that issuance has to be performed in that tight time frame as requested in C3.4.1 (b) and (c) we do not understand why the freedom of the account holder to issue in between 12 months should be restricted. Since all issuances are based on feed in data of the grid operators we don't see any violation potential regarding the eligibility of the GOs. Part from that the German practice offers a greater flexibility to the market as it is possible to react on demands that might occur at later date than a month after production. C3.4.1 (b) and (c) should be discussed.

C.5.5. In contrast to N6.3.2 the owner of a production device that is only able to use biomass for electricity production but more than one kind of biomass is not obliged to submit a Consumption Declaration. These installations are audited once a year by an environmental verifier and receive GOs for renewables – in case of solid biomass – with the Fuel Code “F01010000”. In case the production device is able to mix biomass and fossil fuels, the environmental verifier has to audit the amount of electricity coming from renewables before UBA can issue. In both cases the environmental verifier has to check inter alia whether the amount of electricity is in line with the amount of biomass

used. At least every 12 months the environmental verifier gives such confirmation based on an onsite inspection. In between the environmental verifier may confirm the percentage based on suitable and sufficient evidence provided by the plant operator without being on site (Section 42 subsection 4 HkRNDV). The plant operator is legally obliged to keep sufficient documents concerning the used fuels. The environmental verifier is not on its own able to retrospectively rectify data that he had confirmed before. If it turns out that data and/or GOs issued based on that data are wrong, the environmental verifier and the plant operator are obliged to inform UBA. UBA will take the appropriate measures as described in Section E.8.

C.5.6. Since the legal relationship between UBA and our registry users is not determined by contractual law but by public law, there's no room for STCs. The criteria of E7.1.1 are met in Germany in the following way:

Not applicable as the legal relationship between UBA and our users is only and entirely determined by public law. The legally appointed competent body UBA is legally entitled and obliged to enforce the regulations laid down in the law, most notably HkRNDV.

C.5.7. In contrast C2.1.3 (b) UBA issues GOs for the eligible energy fed into the German grid.



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D Registration

D.1 Registration of an Account Holder

This section demonstrates compliance with the following EECS Rules:

G2.2.1						
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Any – legal or natural – person or association of natural persons which is given legal capacity by the law (like an association under the German Civil Code – Gesellschaft bürgerlichen Rechts [GbR] or a general partnership – Offene Handelsgesellschaft [oHG]) is entitled to take part in the HKNR. We differentiate between the following roles:

- plant operators,
- electricity suppliers,
- traders
- service providers/agents
- grid operators
- environmental auditors and auditing organisations

The first three (3) groups (plant operator, electricity supplier, trader) receive a GO account. The last three (3) groups (service providers, grid operators, environmental auditors) only receive access to the GO system but not an own account. These last three (3) roles do not handle GOs. Combinations of roles are possible (exception: an environmental auditor is not allowed to be a plant operator as well). Service providers are persons or organisations offering account holders the service to manage their business with the HKNR; often plant operators make use of service providers to handle their administrative procedures for them. /Section 6 subsection (3) HkRNDV)

Traders who are not a supplier nor an electricity producer are allowed to open an account in the registry (Section 6 subsection 4 HkRNDV). Those traders can only trade including import and export. They are prevented from cancelling, because the right to cancel is only conferred to suppliers (because only suppliers are obliged to provide an electricity disclosure statement to their final customers, Section 30 HkRNDV).

Whether an applicant really is an electricity supplier is scrutinized by UBA in the course of the account opening procedure. Legal basis for this check is the definition of electricity supplier in Section 3 number 20 EEG 2021, according to which an electricity supplier is every natural or legal person supplying electricity to final consumers. Electricity suppliers who supply household consumers are obliged to register with the BNetzA and BNetzA publishes a list on the web of all listed suppliers who supply electricity to household consumers. We check whether the applicant is listed on this list. Also, all electricity suppliers are obliged to publish their electricity disclosure statement(s) on their websites. We check the websites of the applicant for the current disclosure statement(s). If an applicant is neither listed on the BNetzA list of suppliers nor can he present the current disclosure statement, we check his website and published STCs, have him explain his business and/or check the commercial registry to determine whether the applicant really supplies electricity to final consumers.

An application to get an account or only access to the system consists of

- filling out the application form in the software



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- pass through the PostIdent procedure of the Deutsche Post AG (German postservice provider) to confirm one's identity (only persons living in Germany; people living outside Germany send a copy of the passport via upload in the software)
- (in the case of a legal person or association with legal capacity) hand in a certificate of authority and necessary documents out of the Commercial Registry.

Non-German residents can choose whether to prove their identity by uploading a coloured copy of their ID or passport or by following the PostIdent-procedure (number 3.2 (2) Terms of Use). The reliability of each applicant (domestic and foreign) is checked according to the registers' security policy which relies on the same criteria than the AIB KYC-form. This security policy requires to cross-check the information given to HKNR by the applicant against the information we have from the applicant or other (public) sources and/or to ask the applicant for further information, explanation and/or documentation to enable us to verify his/her reliability.

The data needed for the application form are laid down in Section 6 subsection 3 and 4 (concerning normal members), Section 8 subsection 5 and Section 10 HkRNDV. A screenshot can be found in Annex 2.

UBA verifies all these data, checks the identity of the applicant via the PostIdent procedure and the eligibility of the user to act for an organisation. In case of an environmental verifier UBA also checks whether the auditor complies with the scope of auditors (NACE-Code 35.11.6 and 35.11.7).

The timeline depends on the question whether the applicant handed in all relevant documents. If it was the case accepting lasts one (1) business day. UBA asks the applicant to hand in missing documents several times (immediately after receiving the incomplete application, then four weeks later).

Reasons for rejection can be found in Section 6 subsection 7 HkRNDV if the requirements for opening an account are not met in their entirety or if there is a reason for exclusion pursuant to that refers to Section 49, Section 50 and Section 51 HkRNDV. They describe e.g. cases of willfully sending wrong data or committing a crime with the registry, sending wrong data by an environmental auditor or allowing third persons to use their personal account. In all these cases the security, accuracy or veracity of the HKNR are at risk.

UBA accepts the application by sending the user an official notification containing an administrative decision. If the application is accepted, the user gets access to the registry and – depending on the role – an additional account for GOs. The user activates the access himself by giving himself a password.

An access and an account can have several sub-users under the guidance of one user. One user can open several accounts within one access.

D.2 Resignation of an Account Holder

None directly						
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If the user wants to resign he applies to do so (Section 50 subsection 1 number 1 HkRNDV). The account holder or his service provider is entitled to initiate the resignation.

UBA checks whether GOs are still on the account. In this case UBA informs the user. The user has the possibility to sell or cancel the remaining GOs. If he does not sell or cancel them, the GOs expire after 18 months according to Section 34 since the account has been closed and the user no longer has access to it. UBA lets the GOs expire and closes the account (Section 50 subsection 3 HkRNDV).. The GOs UBA has allowed to expire in this case of resignation without clearing the account may not be used for disclosure purposes. The user holding an account receives his last administrative decision to pay outstanding fees. All data will be marked as “cancelled” and are not visible for other users anymore

D.3 Registration of a Production Device

This section demonstrates compliance with the following EECS Rules:

C2.1.1	C2.1.2	C2.2.4	D4.1.2	E3.3.11	N6.2.	O6.2
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The owner of the production device or his service provider is entitled to register the plant. Before registration of a production device they have to register themselves and prove their power of attorney by sending to UBA a written certificate of authority and – in the case of an organisation – an up-to date copy out of the Commercial Registry.

The production device

- has to produce electricity from renewable energy sources,
- has to be located in Germany, in the German Exclusive Economic Zone or at least on the border to another country (e.g. Austria, Switzerland, France, Luxembourg).

The applicant has to report to UBA all data mentioned in Section 21 HkRNDV. As long as the owner does not fill in all of these data the installation cannot be registered. The data are cross-checked by UBA. The production device receives a unique registration number.

In some cases, an environmental verifier has to validate the data the owner sends to UBA. That is especially the case with installations

- that have not been supported under the RES support scheme within the last five years, that is by the feed-in-tariff, the market premium or used the green electricity-privilege within the last five years (Section 22 subsection 1 number 2),
- that can use biological but also fossil fuels (Section 22 subsection 1 number 1 HkRNDV),
- that use pumped water for electricity production and have a specific efficiency factor (Section 13 subsection 3 HkRNDV),.
- High Efficiency Co Generation installations (Section 22 subsection 1a HkRNDV)

The owner may report UBA some environmentally friendly specifications of the production device, its construction or operation (Section 16 subsection 2 HkRNDV) e.g. a fish pass at a water plant). An environmental verifier has to approve these “additional contents”.

After filling in the registration form and checking by the verifier, UBA submits the data automated via Edifact communication to the grid operator to validate the data



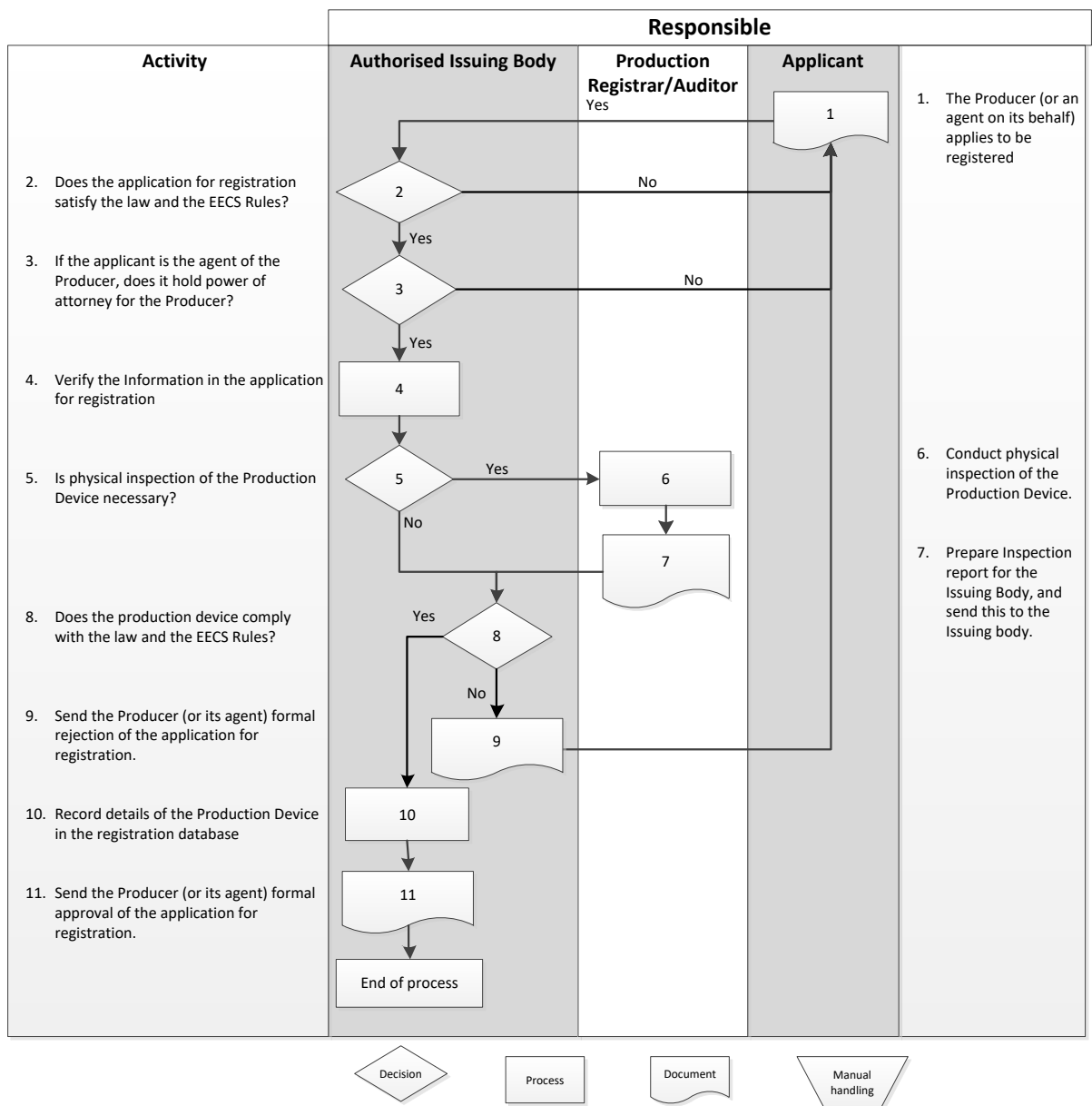
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of the production device the owner had sent to UBA (Sections 11 and 41 HkRNDV). If the data are valid the grid operator sends to UBA all production data of the installation.

The timeline for the registration of a production device depends on the specific preconditions, especially the question whether an environmental verifier has to audit the plant. In other cases, the registration may last at about two or three weeks.

Production devices located on border between domains: UBA issues in accordance with the Competent Bodies in the other countries using the mechanisms laid down in state contracts or concessions. If the Competent Body in the other country issues GOs using a different mechanism than laid down in state contracts or concessions, UBA consults with the relevant Competent Body in the other country on the procedure. If there is neither a state contract nor a concession dealing with the distribution of electricity to both countries UBA issues GOs for the electricity fed into the German grid.

To handle some difficult procedures UBA offers papers to some topics, e.g. "What is a generator?" (<https://www.umweltbundesamt.de/dokument/anlagenbegriff-im-hknr>) or "How to deal with border plants?"



D.4 De-Registration of a Production Device

None directly						
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The owner of the plant can “Delete” the registered installation by using the “delete”-button. As a result, UBA stops the communication with the grid operator concerning the deleted production device and thus will not issue any GOs anymore. Data will not be deleted physically but stored in UBA’s database; they are no longer visible for the users of the HKNR. This procedure will last a week the longest. As UBA is allowed to correct all data in the registry it is also entitled to delete a production device if it doesn’t exist anymore. For re-registration the complete registration process has to be conducted.

D.5 Maintenance of Production Device Registration Data

This section demonstrates compliance with the following EECS Rules:

C2.2.1	C2.2.2	C2.2.3	C2.2.5	D5.1.2		
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- D.5.1. The registration of a Production Device expires after five years. The Registrant must re-apply for registration for the Production Device before expiry.
- D.5.2. The plant operator is legally obliged to inform UBA about every change of data of the production device (Sections 12, 24, 38 HkRNDV) and to correct them via a web form (e.g. new capacity or new metering devices). UBA receives an information about these changes of data. If the user fails to inform UBA, UBA may impose an administrative penalty (Section 48 subsection 2 HkRNDV). UBA is enabled to correct all data (Section 4 HkRNDV).

D.6 Audit of Registered Production Devices

This section demonstrates compliance with the following EECS Rules:

E3.3.7	E3.3.8	D5.1.2				
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- D.6.1. The period between inspections of a Production Device will not exceed 5 years.
- D.6.2. Refusal to permit access to a Production Device may be considered a breach of the law, esp. Section 43 HkRNDV.
- D.6.3. The owner is obliged to report every change to the installation to UBA (Section 24 subsection 1 HkRNDV), this also applies to a change of the capacity of the plant. These changes in the specifications of the production device are recorded as a change of the existing, not a registration of a new plant.
- D.6.4. The registration of the production device has to be renewed every five years (Section 26 HkRNDV). UBA is allowed to command an expertise by an environmental auditor about a production device to cross check the statements of a plant operator (Section 44 subsection 2 HkRNDV).
- D.6.5. If an inspection identifies material differences from the details recorded on the EECS Registration Database, the Registrant must correct the data of the Production Device. If the owner fails to correct data, UBA may impose an administrative penalty (Section 48 subsection 2 HkRNDV). In some cases, the verifier has to refresh the audit after a change of the production device e.g. if the capacity changed (Section 24 subsection 2 HkRNDV).
- D.6.6. Some installations have to be inspected by an environmental verifier; these are installations
 - that have not been supported under the RES support scheme within the last five years, that is by did not receive the feed-in-tariff, the market premium or used the green electricity-privilege within the last five years (Section Section 22 subsection 1 number 2 HkRNDV),
 - that can use biological but also fossil fuels (Section 22 subsection 1 number 1 HkRNDV),



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- that use pumped water for electricity production and have a specific efficiency factor (Section 13 subsection 3 HkRNDV),
- Registration of High Efficiency Cogeneration Devices need inspection by an environmental auditor (Section 22 subsection 1a HkRNDV)

D.7 Registration Error/Exception Handling

This section demonstrates compliance with the following EECS Rules:

C2.2.2	E4.2.7					
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- D.7.1. Any errors in EECS Certificates resulting from an error in the registered data of a Production Device will be handled in accordance with section E.8.
- D.7.2. If UBA detects mistakes in data it is entitled to correct them (Section 4 HkRNDV). UBA may take the necessary measures to prevent errors in e.g. cancellation and transfer of GOs. Account holders are legally obliged to correct all mistakes in data (Section subsection 3 HkRNDV). If they fail to correct data, UBA may impose an administrative penalty (Section 48 subsection 2 HkRNDV).



E Certificate Systems Administration

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E.1 Issuing EECS Certificates

This section demonstrates compliance with the following EECS Rules:

A2.1.1	A2.1.2	C3.1.1	C3.2.1	C3.3.1	C3.4.2	C3.4.4
N3.1.1	O3.1.1					

UBA issues GOs if (Section 12 HkRNDV) for all preconditions

- the production device is registered properly which includes the communication with the grid operator via EDIFACT,
- the production device is allocated to one of possible several accounts of the owner,
- for every production period, the grid operator reports UBA the amount of produced energy from renewable energies, where applicable checked by an environmental auditor,
- the owner of the production device applies for the issuance of GOs. He may apply for them every single month or subscribe for the issuance for a fixed or open period,
- the owner of the production device does not receive a feed-in tariff, market premium,
- the electricity was not produced more than twelve (12) months ago.
- The face value of one (1) GO is one (1) MWh. The production period in the GO is always the calendar month.
- According to the net electricity a production device produces and feeds into the grid UBA issues GOs (Section 12 HkRNDV, Section 79 EEG 2021). The grid operator sends UBA data not only on the amount of electricity but also on the kind of marketing of the electricity (that is the information whether the PD operator requests support for the electricity and if so which kind of support) – it is impossible to receive the feed-in-tariff or a premium and get GOs issued for the same amount of electricity. Accordingly, it is impossible to issue regional GOs and GOs for the same amount of electricity, as regional GOs can just be issued for amounts of electricity which receive a premium.
- A quantity of electricity produced by a production device which is less than one Megawatt hour may be carried over on the “electricity account” into the next period until one Megawatt hour is completed.
- GO from Pumped Hydro Storage Devices, Multi Fuel Devices (Biomass, Waste inceneration devices, High Efficiency Cogeneration, will be issued after an environmental auditor certified the respective amount of energy as being eligible). (Section 12 HkRNDV, Section 13 HkRNDV).
- UBA will inform the account holder of the issuance of any GO into that account holder’s transferables account and of that GO’s details and make all information available to that account holder.
- UBA allows for additional Information for High Efficiency Cogeneration if confirmed by the environmental auditor (Section 12 subsection 1a HkRNDV, Section 16 HkRNDV).



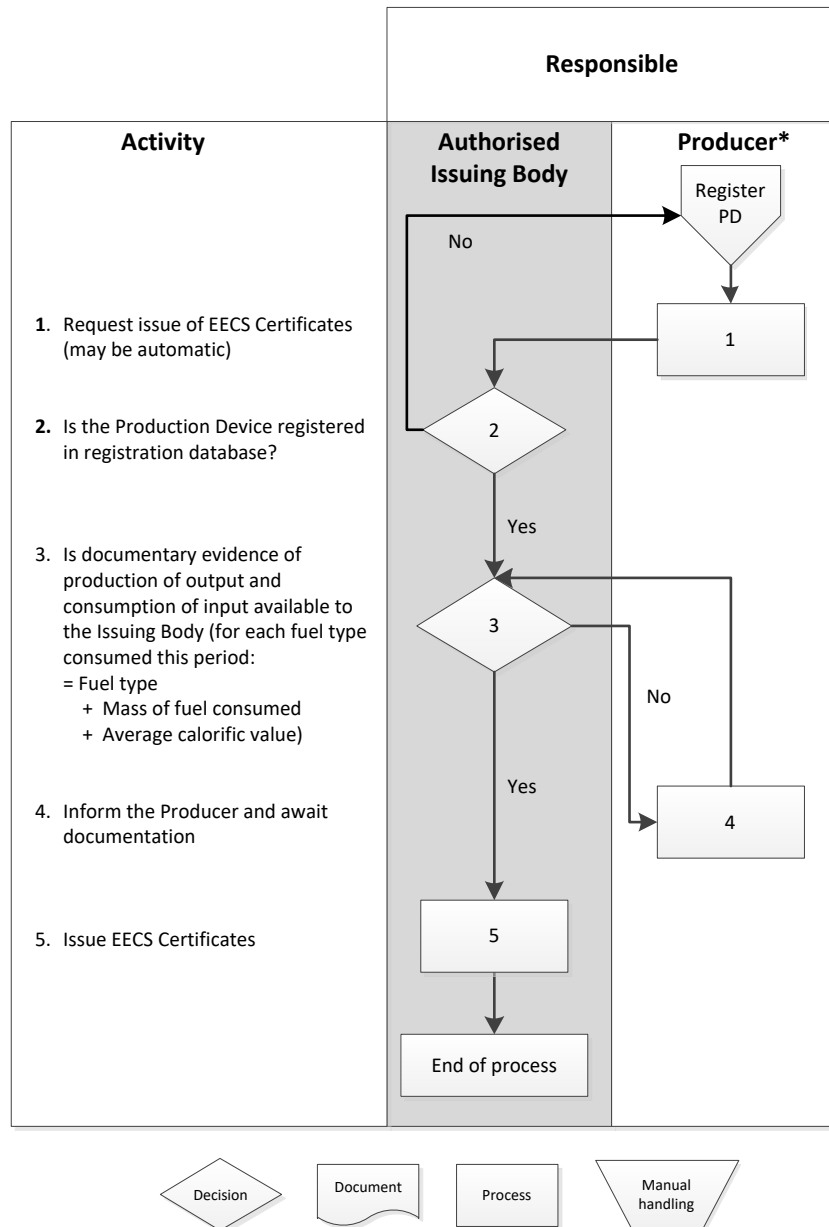
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- UBA allows for additional criteria if the environmental auditor confirms them:
 - additional criteria, if the production device is constructed or operated in an environmentally friendly way (Section 16 subsection 2 HkrNDV)
 - “optionale Kopplung” (optional linking between GO and electricity produced): The owner of the production device may sell his GO to the same electricity supplier he delivers the electricity to via his virtual “accounting grid” (Section 16 subsection 3 HkrNDV). This regulation expires on 01.01.2023. It will be replaced by a newly regulated optional linking which can be used in the cancelation process.

E.2 Processes

This section demonstrates compliance with the following EECS Rules:

C3.4.1	C3.4.3	C3.5.1	C3.5.2	C3.5.3	D7.1.2	N6.4.
O6.4.						



E.3 Measurement

This section demonstrates compliance with the following EECS Rules:

D6.1.2	N6.4.	O6.4				
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The nett measurement depends on the meter and how it can be read:

- In the case the meter can be read automatically via radio-communication or internet (so called RLM), the grid operator sends UBA the produced energy once a month for the month passed (Section 41 subsection 2 sentence 2 number 1 HkRNDV). UBA issues the GOs for the month passed.
- In the case the meter cannot be read automatically (so called SEP), the grid operator sends the data every time a staff member reads the

meter but at least once a year (Section 41 subsection 2 sentence 2 number 2 HkRNDV). UBA issues GOs then for the metering period which is determined by the dates when the meter was read. The first day of the production period is the day after the last reading. The last day of the production period is the day of the recent reading (Section 17 subsection 3 HkRNDV). There is no breakdown of production per calendar month. Instead, on the GO the production period is expressed as the calendar month in which the production period ended (Section 17 subsection 1 HkRNDV).

- Line losses are not considered as such. GOs are issued based on measured grid injection. Electricity lost before injection is not measured and therefore not issued. Line losses after injection are also not measured and therefore not considered. There's currently no possibility in Germany to cancel GO's to green grid losses.
- Auxiliaries are measured by separate meters in the power plants. All types of PDs with auxiliaries (biomass plants, waste incineration plants and pumped hydro power plants) need their electricity production confirmed by an environmental verifier before issuance. The environmental verifier confirms that auxiliaries are deducted from gross production based on the metered values

E.4 Energy Storage (Including Pumped Storage)

This section demonstrates compliance with the following EECS Rules:

N5.3.1						
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E.4.1. UBA issues GOs for electricity deriving from pump storage sites but only for the natural feedings and not for the pumped water. UBA will calculate the natural feeding as follows: $GO\text{-relevant Electricity} = \text{Electricity produced} - \text{Electricity used for pumping}$. Upon application of the Producer it is possible to factor in losses to compensate inefficiency of pumping activity. Such a factor for the inefficiency of the pumping activity will be considered if it is verified by an environmental verifier.

E.4.2. UBA issues GOs for the output of energy storage

The storage device as such is not recognized as a Production Device but as a system. This approach enables UBA to issue GOs for several devices (which can use different renewable energy carriers) feeding into one storage device before grid injection.

If several production devices feed into a storage device, GOs are issued for the output from the storage proportionately for each production device. (Section 12 subsection 5 HkRNDV). The feed-in sum is calculated by forming the product of the quantity of electricity fed into the grid and the quotient of the quantity of electricity fed into the storage facility from the respective installation and the sum of the quantities of electricity of all installations feeding into the storage facility (Section 12 subsection 5 HkRNDV). When registering a production device, the operator shall state whether it feeds into a storage device being on the same site as the respective production device

(Section 21 subsection 1 sentence 2 number 14 HkRNDV). The master data and the feed-in quantities of the production devices are provided by the responsible grid operator (Section 41 HkRNDV). By issuing GOs for the respective installation and thus observing all issuing rules as described in sections D and E, it is ensured that there are no multiple issuances for the same amount of energy. So far, there is no case of application.

E.5 Combustion Fuels (e.g. Biomass) and Production Devices with multiple energy inputs

This section demonstrates compliance with the following EECS Rules:

N6.3.2	O6.3.2					
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Biomass and fossil combustion plants: Here the environmental verifier has to audit the consumption declarations before UBA issues GOs the amount of electricity produced by biomass (Section 12 number 8 HkRNDV). UBA issued specifications how exactly to deal with biological amounts in waste in number 7 Terms of Use.

E.6 Format

This section demonstrates compliance with the following EECS Rules:

C3.5.4	C3.5.5	N6.5.	N6.6	O7	O8	
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E.6.1. EECS Certificates shall be Issued in such format as may be determined by AIB.

E.6.1. The GO comprises all the relevant content as Article 19 subsection 7 of the Directive 2009/28/EC demands. The relevant content is laid down in Section 9 EEV and additionally in Section 16 subsection 1 HkRNDV. This is in line with the EECS rules C3.5.4

E.7 Transferring EECS Certificates

This section demonstrates compliance with the following EECS Rules:

C5.1.1	C5.1.3	C5.1.6				
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E.7.1. Only valid GO this is GOs that have not been cancelled, have not expired or withdrawn can be transferred.

E.7.2. Transfer and export:

The initiation of transfers is by the selling account holder. The transfer of certificates and the confirmation of that transfer is automated. It is secured by an mTAN-Procedure to grant authority (number 3.3 Terms of Use).

The account holder gets access to the account to make transfers of GOs to another account of the German domain or the domain of another issuing body in another domain through the registry website. He indicates the name of the addressee (national transfer) or the account number of the addressee (export) of the GOs. Only GOs for renewable electricity may be exported from the German domain. For the export UBA gets in contact with the foreign



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issuing body and provides all relevant information for the transfer of the GOs. The export takes place via the Hub of the AIB. The rules of the AIB apply, for example concerning special environmental qualities which are earmarked on the GO and are not transferable as long as they are not foreseen in SD03 and/or Fact Sheet 17. In the process of transferring or exporting the GOs UBA deletes them from the account of the sender.

E.7.3. Import:

The foreign account holder can only transfer RES-GOs into the German domain. UBA checks whether the GOs are acceptable according to Article 19 subsection 9 Directive 2018/2001/EC. If the GOs are acceptable UBA places the information in the addressee's account. ICS flags are not displayed in the HKNR. Account transactions remain visible for at least a year. UBA keeps necessary data of transfers at least 10 years after closing the specific file. If the account number which had been specified in the import request doesn't exist in our register we try together with the importing registry to find out who the addressee of the import in our register shall be and to provide the importing registry with the correct account number. If an import fails due to the correct account number of the addressee being unknown the certificates are being re-booked to the sending account and records are such that no import has been taken place.

Non EECS-GOs are technically prevented from entering the HKNR.

E.8 Administration of Malfunctions, Corrections and Errors

This section demonstrates compliance with the following EECS Rules:

C5.1.7	C8.4.1	C8.4.2	C8.4.3	C8.5.1	D9.1.2	
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E.8.1. Once issued, the details of an EECS Certificate cannot be altered or deleted except to correct an error.

E.8.2. UBA has wide administrative competences:

- Correction of all data in the registry (Section 4 subsection 1 HkRNDV),
- Taking necessary measures to prevent errors in the HKNR, including the issuing of GOs (Section 4 subsection 2 HkRNDV)
- Withdrawal of expired GOs (Section 34 HkRNDV),
- Demand of additional reports by environmental auditors (Section 44 subsection 1 HkRNDV),
- Impose administrative penalties (Section 48 HkRNDV),

- Suspension or shut down of an account as a consequence of misconduct (Sections 49, 50 HkRNDV).

E.8.3. UBA gives the account holder of the respective GO the opportunity to explain the circumstances of the error via e-mail or telephone. If UBA shares the view that it has to withdraw or cancel a GO, it has the competence to do so. This may also happen in the account for international transfers.

E.8.4. In case the GOs are no longer in the German domain, UBA will cooperate with other issuing bodies to withdraw the erroneous GOs.

E.8.5. Undue enrichment of any account holder has to be avoided.

E.9 End of Life of EECS Certificates – Cancellation

This section demonstrates compliance with the following EECS Rules:

C5.2.3	C6.1.1	C7.1.1	C7.2.1	C7.2.2	C7.2.3	C7.3.1
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E.9.1. Cancellation is removing a Certificate from circulation. Once Cancelled, a Certificate cannot be moved to any other account, and so is no longer tradable.

E.9.2. The initiation of cancellations is by the relevant account holder (Section 30 HkRNDV).

E.9.3. The cancellation of certificates is automated within the registry after the request of the account holder. The cancellation is secured by an mTAN-Procedure.

E.9.4. The confirmation of the success or failure of a cancellation is notified to the account holder by the issuing body. The account holder receives a message on screen at the end of the cancellation process.

E.9.5. If the Account Holder wants to receive the chic proof of cancellation (as exemplarily shown in Annex 5) he/she applies for it by using the function “create proof of cancellation” which is embedded in the function “overview of cancellation” within the HKNR software. The generation of the cancellation statement is only possible after the cancellation has been confirmed. The Account Holder can ask for the cancellation statement right after the completion of the cancellation or at any later session.

E.9.6. “Optionale Kopplung” (optional linking between GO and electricity produced)

Upon application by the electricity supplier the guarantee of origin may be cancelled with the indication that the supplier has supplied to its final customer the electricity for which the guarantees of origin to be cancelled have been issued.

The additional information to the cancellation of “linked supply” requires that the underlying electricity has been supplied to the supplier via one or two balancing groups subject to confirmation by an environmental auditor (§ 30a HkRNDV). The option of linking the supply has come into force as of 01.01.2023 and replaces the former concept of “optional coupling” which only allowed supply via one balancing group and where the relevant GOs were marked upon issuance. The new concept is more flexible and by tying it to the cancellation process allows for linked supply of imported electricity and across electricity regulation zones.



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E.10 End of Life of EECS Certificates – Expiry

This section demonstrates compliance with the following EECS Rules:

C5.2.3	C6.1.1c	E6.2.1h				
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E.10.1. EECS Certificates cease to be valid for transfer twelve months after the end of the period during which the output to which they relate was produced. (Section 28 subsection (2) HkRNDV)

E.10.2. EECS Certificates cease to be valid for cancellation eighteen months after the end of the period during which the output to which they relate was produced (Section 34 HkRNDV). The production period is in most cases (RLM-metering) one month. The account holder receives a “cancellation warning” two weeks (14 days) before the cancellation may take place. If the account holder does not react UBA automatically declares the GOs expired. This expired GO may not be used for disclosure purposes (Section 34 HkRNDV). Expired GOs are reported to the BDEW to be included into the calculation of the German residual mix.

E.10.1. Whether a GO has been cancelled for disclosure purposes or been declared expired is distinguishable by earmarks.

E.10.2. GOs left on a closed account remain untouched until they expire within 18 months. Those volumes are also reported to the BDEW for purposes of the residual mix calculation.

E.11 End of Life of EECS Certificates – Withdrawal

This section must demonstrate compliance with the following EECS Rules:

C5.2.3	C6.1.1	C8.2.1				
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E.11.1. UBA may withdraw GOs which suffer a serious and obvious mistake (Section 32 subsection 1 number 3 HkRNDV).

E.11.2. Cancellation and withdrawal are the result of an administrative procedure, especially after a misconduct of the account holder or serious and obvious mistakes. In both cases UBA gives the account holder the opportunity to react after UBA's threat to cancel or withdraw the GOs.



F Issuer's Agents

This section is not required if the roles have been identified and explained in B3.

F.1 Production Auditor

This section must demonstrate compliance with the following EECS Rules:

None directly						
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It must describe:

- *the role of the production auditor and in relation to which energy carrier(s)*
- *the production auditor must be approved by the AIB Member*
- *where the schedule of charges for services can be found (if applicable)*

F.2 Production Registrar

This section must demonstrate compliance with the following EECS Rules:

None directly						
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It must describe:

- *the role of the production registrar and in relation to which energy carrier(s)*
- *the production registrar must be approved by the AIB Member*
- *where the schedule of charges for services can be found (if applicable)*

F.3 Measurement Body(/ies)

This section demonstrates compliance with the following EECS Rules:

None directly						
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It must describe:

- *the role of the measurement body and in relation to which energy carrier(s)*
- *the measurement body must be approved by the AIB Member*
- *where the schedule of charges for services can be found (if applicable)*

G Activity Reporting

G.1 Public Reports

This section demonstrates compliance with the following EECS Rules:

E3.3.4	HPA section 14.2					
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G.1.1. For each technology, statistical information are published on the following website [link], regarding:

- certificates issued, transferred internally intra-domain, imported, exported, cancelled, expired **during each month** prior to the current month,
 - certificates issued, transferred internally intra-domain, imported, exported, cancelled, expired **in relation with the energy produced during each month** prior to the current month,
 - certificates imported through a bilateral connection.
- UBA publishes statistical information quarterly as defined and required by ER E3.3.4 on <http://www.umweltbundesamt.de/themen/klima-energie/erneuerbare-energien/herkunftsnachweise-fuer-erneuerbare-energien>.

G.2 Record Retention

This section demonstrates compliance with the following EECS Rules:

A12.1.1	C5.1.2					
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G.2.1. UBA keeps record of any data in the registry as well as data outside the registry which concern material communications with EECS Market Participants regarding the registration of Production Devices and the Issue, transfer and Cancellation of EECS GOs for at least ten years.

G.2.2. UBA is subject to Data Protection Law (Article 15 of the Regulation (EU) 2016/679, Section 1 subsection 1 Federal Data Protection Act),

<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN>

https://www.gesetze-im-internet.de/bdsg_2018/_1.html

UBA has to delete data after a period of maximally 10 years if the specific file has been closed. UBA will keep information in electronic and paper files.



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G.3 Orderly Market Reporting

This section demonstrates compliance with the following EECS Rules:

E4.2.5	E4.2.6	E4.2.7				
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G.3.1. Based on section 46 subsection 1 number 2 HkRNDV UBA will notify other Issuing Bodies as well as the AIB about failures of EECS Market Participants to comply with the law which could impact on the recognizability of EECS GOs from this EECS Market Participant.

G.3.2. UBA shall freeze an account if there's good reason to suspect that in connection with use of the account register participants or users have committed or intend to commit a criminal offence (Section 49 subsection 1 number 2 HkRNDV).

UBA may freeze an account if there's good reason to suspect that the security, accuracy and reliability of the register are jeopardised; as a rule, this will be the case if there is good reason to suspect that issuance, transfer and cancellation might or will be attempted based on false details (Section 49 subsection 2 number 1 HkRNDV), or if a register participant has supplied false or willfully supplied incomplete information with regard to information necessary for opening an account (Section 49 subsection 2 number 3 HkRNDV). The effect of freezing an account is that no action regarding GOs can be effected on this account (Section 49 subsection 2 number 3 HkRNDV).

According to Section 49 subsection 3 HkRNDV the register administration shall inform the account holder of the freezing of the account, GOs on a frozen account expire according to the general rules. If the Account Holder suffers any damage from this and UBA has caused the damage due to wilful or negligent conduct, UBA will be liable without limitation (Article 34 of the German Basic Law).

G.3.3. The register administration may close an account if use of the account poses a continuing threat to the security, accuracy and reliability of the register. As a rule, this is the case if it is suspected that in relation to an installation assigned to the account 1. improper data on electricity quantities has been submitted to the register administration, or 2. incorrect verifications by an environmental verifier or environmental verification body have been submitted to the register administration (Section 50 subsection 2 HkRNDV)

G.3.4. The register administration shall exclude account holders and users authorized to operate an account from participation in the register if they have committed a criminal offence by using it (Section 51 subsection 1 HkRNDV).

Account holders and users authorized to operate an account jeopardizing the security, accuracy and reliability of the register may be excluded from the use of the register. As a rule, this is the case if 1. as a result of their use of the register they have repeatedly committed administrative offences, 2. they have obtained unauthorized access to accounts or other register transactions or have attempted to obtain such, or 3. intentionally or through their negligence they have permitted unauthorized third parties to have access to the account (Section 51 subsection 2 HkRNDV).



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H Association of Issuing Bodies

H.1 Membership

This section demonstrates compliance with the following EECS Rules:

C2.2.6	C2.2.7					
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H.1.1. The Association of Issuing Bodies brings together the issuing bodies of European energy certificate schemes. The AIB promotes the use of a standardised system, based on a harmonised environment, structures and procedures in order to ensure the reliable operation of European energy certificate systems. With its independent and peer reviews, and its periodic audits, the AIB provides a robust framework for reliable and fraud-resistant GO systems. Among others, it can also act by suspending transfers through the Hub. Membership of AIB facilitates mutual recognition of GOs across Europe.

H.1.2. In case UBA ceases to be a Scheme Member of an EECS Scheme, it shall revise its EECS Registration Database so that every Production Device registered therein ceases to be registered for the purposes of EECS. Certificate issuing under EECS would stop, and EECS GOs would remain tradable only until expiry.

H.1.3. In case UBA ceases to be the Authorised Issuing Body for EECS Certificates, it shall revise its EECS Registration Database so that each Production Device in the Domain ceases to be registered for the purposes of EECS Certificates, it shall stop issuing EECS GOs and after a transitional period the registry shall be taken offline.

H.2 Complaints to the AIB

This section must demonstrate compliance with the following EECS Rules:

None directly	(J1.1.2)					
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H.2.1. An Account Holder is allowed to notify the Secretary General of AIB in writing in case:

- a) an Authorised Issuing Body in relation to an EECS Certificate is in breach of any of the provisions of Product Rules in relation to EECS Certificate; or
- b) any Product Rules do not comply with the relevant provisions of the EECS Rules, and evidence is provided substantiating such allegation, and that the Authorised Issuing Body has been given adequate opportunity to respond to such allegation.

The General Secretary of AIB shall invite the relevant Authorised Issuing Body to respond to the allegation.



EECS Domain Protocol

I Change Control

I.1 Complaints to [EECS Scheme Member]

This section must demonstrate compliance with the following EECS Rules:

None directly						
---------------	--	--	--	--	--	--

I.1.1. According to Section 53 HkRNDV measures and decisions of the register administration taken pursuant to that ordinance shall be excluded from the appeals procedure. Therefore, measures and decisions pursuant to the HkRNDV can only be directly disputed at court by action of annulment. In contrast, measures and decisions taken by the register administration pursuant to the GO fee ordinance shall be challenged by appeal first before an action to court is admissible.

I.1.2. Beside appeal and action as formal legal remedies, there are informal complaints possible like remonstrance, petition for administrative review and disciplinary complaint which will be dealt with in an internal investigation.

By internal rules UBA must react on informal request and complaints within 10 (ten) work days. Usually answers are given much faster.

I.2 Disputes

This section must demonstrate compliance with the following EECS Rules:

None directly						
---------------	--	--	--	--	--	--

If UBA and the user cannot resolve the complaint courts are competent to do so (Section 53 HkRNDV).

I.3 Change Requests

This section demonstrates compliance with the following EECS Rules:

E4.2.3	E6.2.1e	L5.1.1				
--------	---------	--------	--	--	--	--

The user may ask UBA to make amendments to German Law. UBA then has to start a legislative procedure to change law, especially the HkRNDV. The procedure is laid down in Sections 42 – 61 of the Joint Rules of Procedure of the Federal Ministries (Gemeinsame Geschäftsordnung der Bundesministerien - GGO), https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/themen/ministerium/ggo.pdf;jsessionid=6895F63E462A5E281F75B7193E57AD2C.2_cid373?__blob=publicationFile&v=2.



Annex 1: Contacts List

Authorised Issuing Body/Registry Operator

Umweltbundesamt (German Environment Agency – UBA)

Elke Mohrbach

Section V1.7 – Registry for Guarantees of Origin

Wörlitzer Platz 1

06844 Dessau-Roßlau

Germany

Tel: +49 340 2103 3017

Fax: +49 340 2104 3017

Mail: hknr@uba.de

www.hknr.de; www.umweltbundesamt.de/energie/hknr/index.htm

Registry support

See www.hknr.de

Production Auditors


Environmental auditors are stated in the data bank of the German inspection body DAU (<http://www.dau-bonn-gmbh.de> and registered in the HKNR

Measurement Bodies


The respective grid operators can be found via the BDEW-Codenummerndatenbank: <http://codenummern.strom.de>


Annex 2: Account Application/Amendment Form

Platzieren Sie für den Schnellzugriff Ihre Favoriten in der Favoritenleiste. [Jetzt Favoriten verwalten](#)



TEST HKNR
Herkunftsachweisregister





Register register participant/Open account

Master data

Corporate data

Company name*

Trade name

Street (office)*

House number (office)*

Addition to address (office)

Post code (office)*

Place (office)*

Country (office)*

H208-Knummer PlantOperator

Participation from

Additional master data


Main user

Cancel
Save


Please supply all compulsory information, marked with an asterisk * for a successful registration.


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TEST HKNR
Herkunftsachweisregister





Register register participant/Open account

Master data

Additional master data

Language*

Phone number*

Mobile phone number

Fax

Email*

e-mail address for billing

Homepage

Type of Registry

Registernumber

VAT*

Additional information

Main user

Cancel
Save

Please supply all compulsory information, marked with an asterisk * for a successful registration.

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Help ▾

Register register participant/Open account

Master data

Additional master data

Main user

User data

Form of address

Title

First name*

Last name*

Street (office)*

House number (office)*

Addition to address (office)

Post code (office)*

Place (office)*

Country (office)*

Phone number*

Mobile phone number*

Email*

Password*

Repetition of password*

Please supply all compulsory information, marked with an asterisk * for a successful registration.

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Platzieren Sie für den Schnellzugriff Ihre Favoriten in der Favoritenleiste. [Jetzt Favoriten verwalten](#)

Help ▾

Please check your data

Corporate data

Company name*

Street (office)*

House number (office)*

Post code (office)*

Place (office)*

Country (office)*

Betriebsnummer (Betriebs)

Additional master data

Language*

Phone number*

Email*

e-mail address for billing

e-mail address for billing

VAT*

User data

Form of address

First name*

Last name*

Street (office)*

House number (office)*

Post code (office)*

Place (office)*

Country (office)*

Phone number*

Mobile phone number*

Email*

Funktion*

System type*

Please enter the CAPTCHA and confirm your data by submitting. If you wish to correct your data please use the Back button below. Please do not use the Back button of your browser as your settings may get lost.




[Reload CAPTCHA](#)

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EECS Domain Protocol

Platzieren Sie für den Schnellzugriff Ihre Favoriten in der Favoritenleiste. [Jetzt Favoriten verwalten](#)



Help

Login was successful

You have successfully transmitted your data. In some minutes you should receive an email by the guarantees of origin register. You will find your user name in this email once again. You may log on to the guarantees of origin register by using this user name and the password chosen by you.

You may now download the PostIdent form. This form will be sent as an attachment to your email address. (This does not apply to grid operators).

User name: Te07898

[Download of your PostIdent form](#)

[Bevollmächtigung](#) / Authorization to open an account in the register of guarantees of origin or the regional register of guarantees (pursuant to section 6(5) sentence 4 HWRNDV)

Form for the authorisation of a service provider for the registration of an installation operator in GO System: [Herkunftsnachweisregister](#)

Form for the authorisation of a service provider for the registration of an installation operator in the regional register of guarantees of origin: [Regionalnachweisregister](#)

[Steuernummer](#)

Bevollmächtigung für die Eröffnung eines Kontos im Herkunftsnachweisregister oder Regionalnachweisregister (gemäß § 6 Absatz 5 Satz 4 HWRNDV):

[Steuernummer](#)

Bitte füllen Sie das hier heruntergeladene Dokument aus – sofern erforderlich – und drucken sie es aus. Der im Handelsregister eingetragene Geschäftsführer muss das Dokument unterschreiben und stempeln. Sie können das Dokument als Scan im PDF-Format nach Anmeldung im Register (Login) in Ihrer Dokumentenverwaltung hochladen.

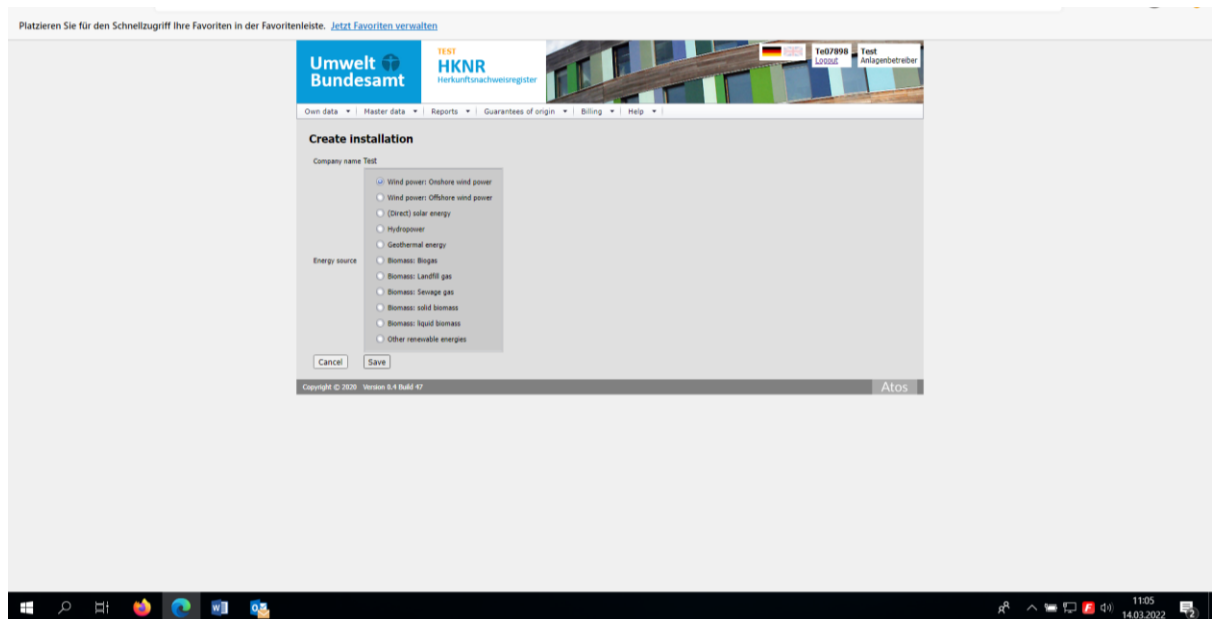
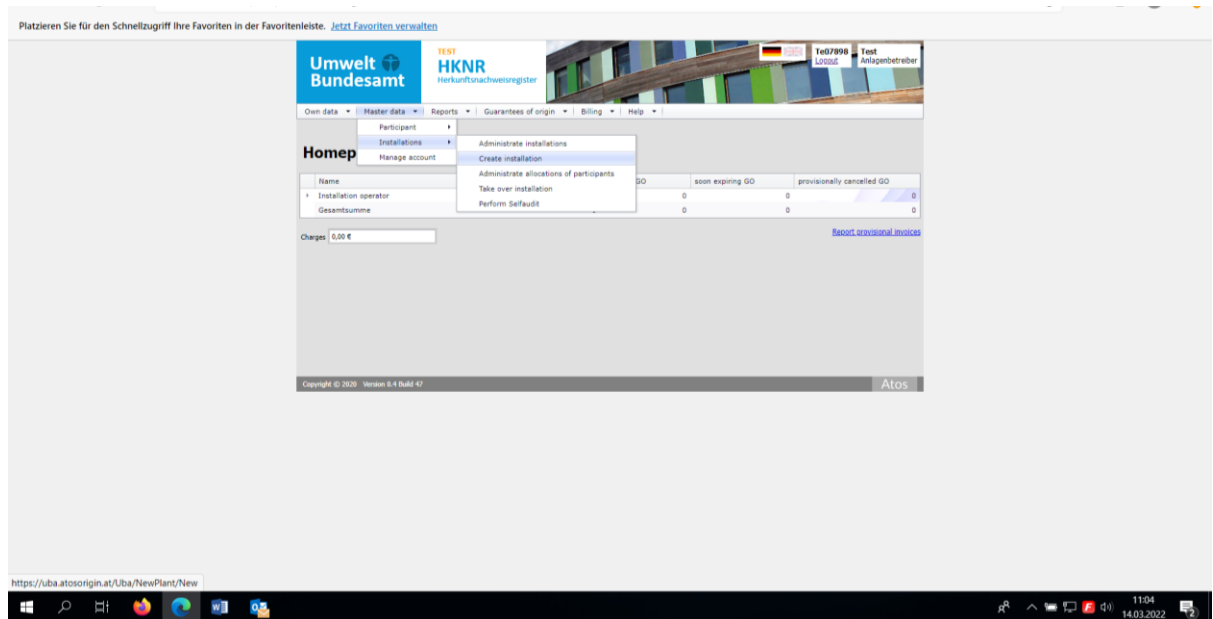
Hinweis: Die Nutzung des HKNR und des RNR folgt den Vorschriften der [HWRNDV](#) und ist gebührenpflichtig.

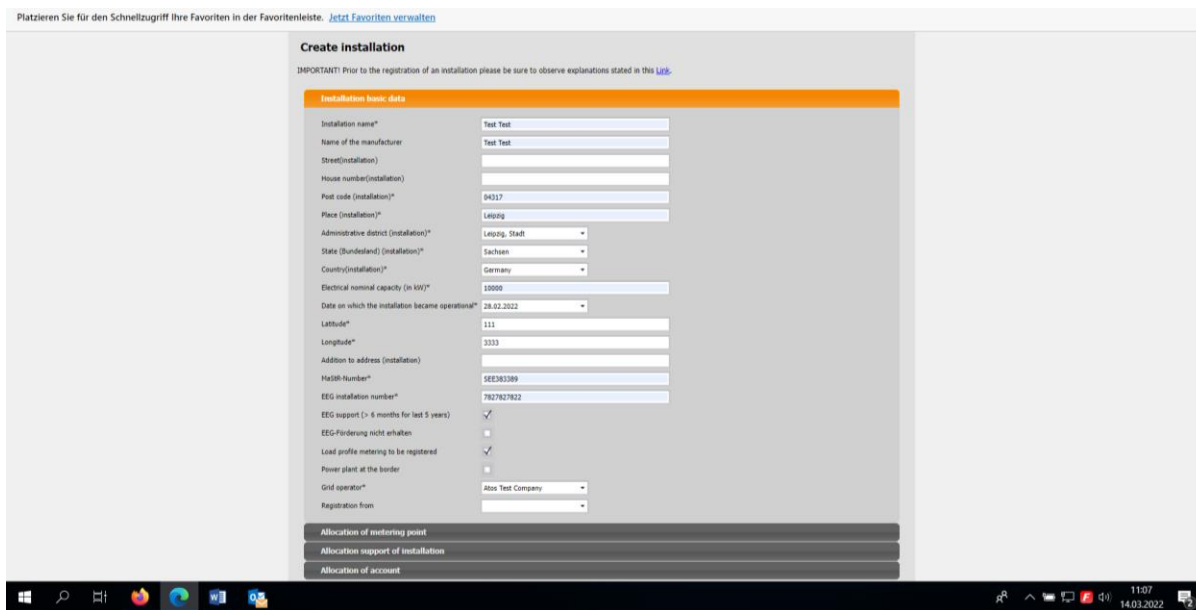
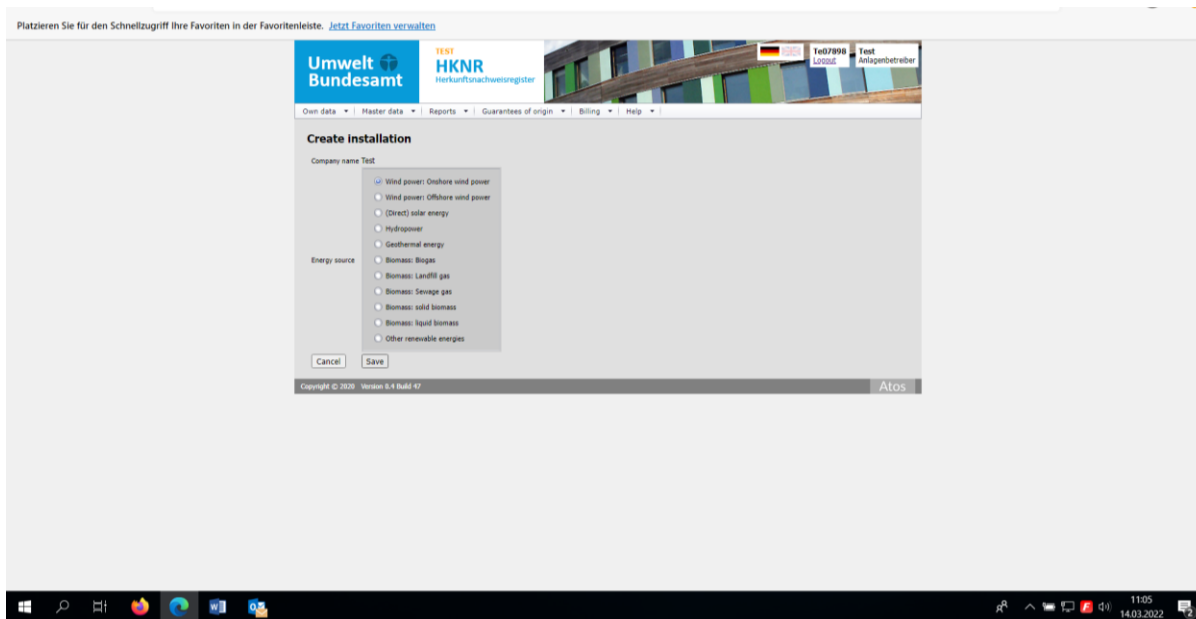
[Hier gelangen Sie zur Startseite](#)

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1055
14.03.2022

Annex 3: Device Registration Form





Platzieren Sie für den Schnellzugriff Ihre Favoriten in der Favoritenleiste. [Jetzt Favoriten verwalten](#)

Create Installation

IMPORTANT! Prior to the registration of an installation please be sure to observe explanations stated in this [Link](#).

Installation basic data

Allocation of metering point

Number of measuring device* 2222

Name of metering point

Number of market location* 626228782

Effective from* März 2022

Effective until

Allocation support of installation

Allocation of account

1107
14.03.2022

Platzieren Sie für den Schnellzugriff Ihre Favoriten in der Favoritenleiste. [Jetzt Favoriten verwalten](#)

Installation basic data

Allocation of metering point

Allocation support of installation

Type of installation* Onshore-Windkraftwerk

No financial support
 Combination of investment promotion and promotion of electricity generation
 Investment promotion
 Promotion of electricity generation
 Status of promotion unknown

Effective from* März 2022

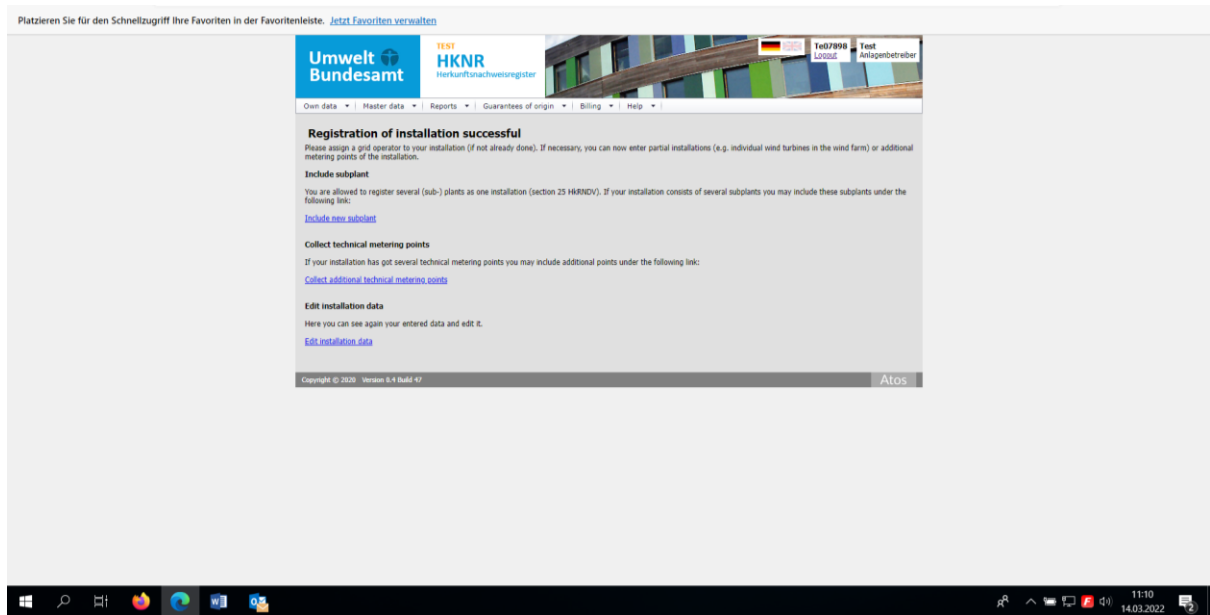
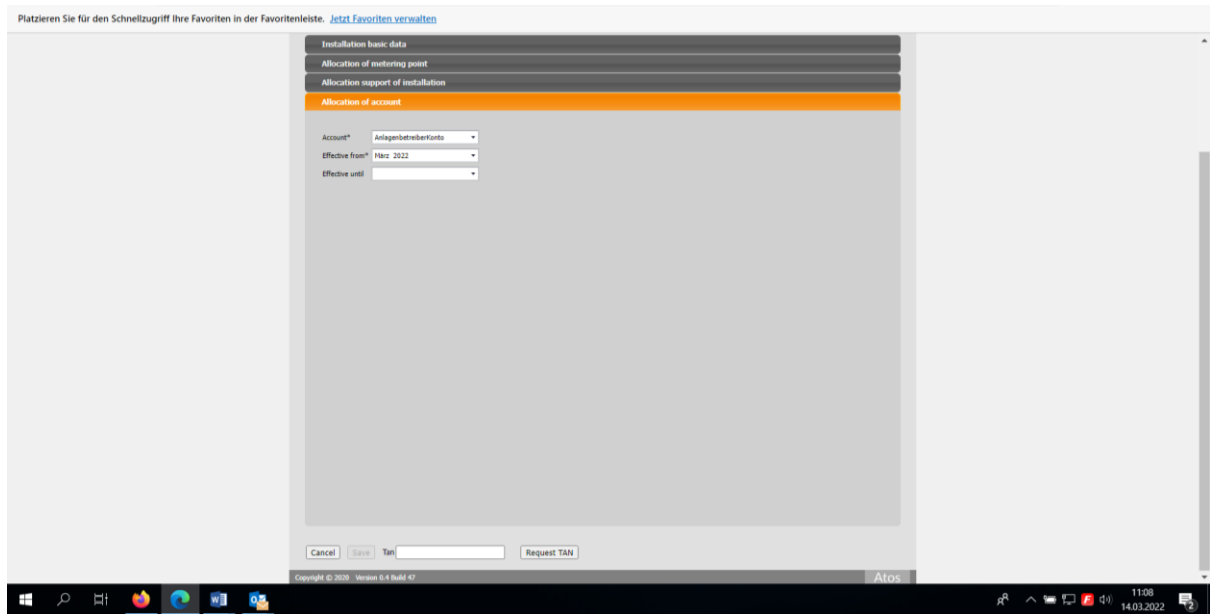
Effective until

Allocation of account

Cancel Save Tan Request TAN

1108
14.03.2022

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EECS Domain Protocol



Annex 5: EECS Electricity Cancellation Statement

ENTWERTUNGSNACHWEIS



ENTWERTET DURCH: ██████████
ERSTELLUNGSDATUM: 30.07.2015
GESCHÄFTSZAHL: ██████████
STATUS: durchgeführt

ENTWERTET VON:	
Firma:	██████████
Straße:	██████████
Nummer:	█
Postleitzahl:	██████
Ort:	██████
Staat:	Germany

ENTWERTET FÜR:	
Stromkunde:	
Stromprodukt:	Ökostromprodukt
Anmerkung:	Ökostromprodukt für ██████████
Entwertungszweck:	Stromkennzeichnung für 2013

ANZAHL ENTWERTETE HERKUNFTSNACHWEISE:	
Produktionszeitraum:	Februar 2013 bis September 2013
Menge (MWh el):	87479
Anzahl entwertete Herkunftsnachweise:	87479

Diese Entwertung von Herkunftsnachweisen entspricht den gesetzlichen Vorgaben zur Stromkennzeichnung gemäß § 42 Energiewirtschaftsgesetz. Demnach muss ein Stromlieferant für direkt vermarktete "sonstige erneuerbare Energien", die nicht nach dem EEG gefördert sind, Herkunftsnachweise verwenden und beim Umweltbundesamt entwerten. Das Herkunftsnachweisregister im Umweltbundesamt setzt die Vorgaben der EU-Richtlinie 2009/28/EG in Deutschland um. Gemäß Art. 15 dieser Richtlinie müssen die Mitgliedstaaten ein elektronisches Register für Strom aus erneuerbaren Energien errichten. Diese Aufgabe überträgt das Erneuerbare-Energien-Gesetz dem Umweltbundesamt (§ 55 EEG 2012 bzw. § 79 EEG 2014).

ENTWERTUNGSNACHWEIS



ANLAGEDATEN	
Anlagenname:	[REDACTED]
Förderung:	Keine Förderung
Int. Anlagenkennung:	[REDACTED]
Ort:	[REDACTED]
Staat:	Switzerland
Energieträger:	Marine
Inbetriebnahmedatum:	[REDACTED]
Installierte Leistung (in kW):	-

Start Zertifikat	Ende Zertifikat	Produktionszeitraum	Entwertungsdatum	Qualitätsmerkmal	Kopplung	Menge
7640113760000000000 [REDACTED]	7640113760000000000 [REDACTED]	01.04.2013	24.04.2014	HKN	Nein	1567
7640113760000000000 [REDACTED]	7640113760000000000 [REDACTED]	01.06.2013	25.06.2014	HKN	Nein	2243
Summe: 3810						

ANLAGEDATEN	
Anlagenname:	[REDACTED]
Förderung:	Keine Förderung
Int. Anlagenkennung:	[REDACTED]
Ort:	[REDACTED]
Staat:	Switzerland
Energieträger:	Marine
Inbetriebnahmedatum:	[REDACTED]
Installierte Leistung (in kW):	-

Start Zertifikat	Ende Zertifikat	Produktionszeitraum	Entwertungsdatum	Qualitätsmerkmal	Kopplung	Menge
7640113760000000000 [REDACTED]	7640113760000000000 [REDACTED]	01.03.2013	24.04.2014	HKN	Nein	4430
7640113760000000000 [REDACTED]	7640113760000000000 [REDACTED]	01.03.2013	24.04.2014	HKN	Nein	10842
7640113760000000000 [REDACTED]	7640113760000000000 [REDACTED]	01.02.2013	24.04.2014	HKN	Nein	4847
Summe: 20119						