

GREECE	Electricity	Natural Gas including (bio)methane	Hydrogen	Other Gas	Heating/Cooling	Space for comments	
Greece	DAPEEP	DAPEEP	DAPEEP	DAPEEP	DAPEEP	For energy carriers other than electricity (columns D, E, F, and G) DAPEEP is the designated Issuing Body, however, no legislation is in place yet where each scheme is established.	
	Actual implementation in the MS 20/11/2024	Actual implementation in the MS [Please fill in date on which you completed the questionnaire]	Actual implementation in the MS [Please fill in date on which you completed the questionnaire]	Actual implementation in the MS [Please fill in date on which you completed the questionnaire]	Actual implementation in the MS [Please fill in date on which you completed the questionnaire]	Actual implementation in the MS [Please fill in date on which you completed the questionnaire]	Instructions for assessment/explanations

Section A

Legislation

Implementation of Article 19 (8) of the Directive 2018/2001 and amended with 2023/2413

Have you fully implemented the requirements of Art. 19 (8) of Directive 2018/2001(EU) amended with 2023/2413(EU)	Yes						If GOs are cancelled for disclosure period 1.4.Y to 31.3.Y+1, is it required that GOs with a production period within those limits are used? Yes/No
- If not, please specify which elements you have not implemented yet.							Please specify

Timing of disclosure

Do the production period on the GO and the disclosure period coincide?	No						As far as a GO has not been expired it can be cancelled during disclosure period (1.4.Y to 31.3.Y+1) to prove the origin of the electricity consumed during year Y. Yes/No
Are GOs valid for transactions for more than 12 months after the production of the energy unit?	No						Yes/No
- If yes, please specify							Please specify
Do GOs that have not been cancelled expire at the latest 18 months after the production of the energy unit?	No						Yes/No
- If no, please specify	GOs expire 12 months after the end of the production period they have been issued for						Please specify
Are expired GOs collected into the Residual Mix (by fulfilling the statistic requirements of AIB)?	Yes						Yes/No
- If no, please specify							Please specify
When is the deadline for disclosure?	31 March Y+1						please specify; ex. 31 March Year X+1

Recognition of GOs from other countries

Do you have criteria in place for accepting foreign GO for disclosure?	Yes						Yes/No
- If yes: Are the criteria transparently published in your country?	Yes they are published in the Domain Protocol						Please specify and indicate where those are published. If electronically please provide a link.

Do you accept imported GOs for disclosure from all EU member states and other members of the European Economic Area (EEA)?	Yes					EECS GOs are allowed to be electronically imported to the EECS Registration Database of DAPEEP if they fulfil the following requirements: -They are issued by an Issuing Body which is designated by an EU/EEA Member State or a third country that has concluded an agreement with the Union on mutual recognition of GOs -They are issued for electricity produced from RES or high efficiency CHP Production Devices -The lifetime of 12 months has not been expired. For EECS GOs issued for high efficiency CHP the additional information under E.7.2 a, b, c, e, f shall be registered in the GOs.	Yes/No
- If no, please name the countries from which you do not accept imported GOs for disclosure							Please specify
- If yes, please specify the reasoning for accepting	Article 19(9) of 2018/2001 (EU)						Please specify
Do you accept imported GOs from parties to the Energy Community Treaty?	No					Only if the Union has concluded an agreement on mutual recognition of GOs	Yes/No
- If yes, please name the countries from which you do import							Please specify
- If yes, please specify the reasoning for accepting							Please specify
Do you accept for disclosure imported GOs from other countries than EU and EEA?	No					Only if the Union has concluded an agreement on mutual recognition of GOs	Yes/No. This question is merely oriented towards countries from EU and EEA, but others are welcome to fill in
- If yes, please name the countries from which you accept imported GOs for disclosure							Please specify
- If yes, please specify the reasoning for accepting							Please specify
Does the customer get information on the country of origin of the GOs in the disclosure statement?	The cancellation statement includes the PD data (Name, ID, Country, El. Capacity, Operational date, Location, Technology, Energy source)						Yes, please specify where and how/No

Energy Storage

Can storage prolong the lifetime of a GO for more than 12 month after the production of the energy unit?	N/A						Please describe
Does your system facilitate "Storage Issuance" (= cancel GOs for the input into storage and issue GOs for the storage output, with new production period?)	No						Yes/No
- If yes, do you provide separate cancellation statistics for energy that goes into storage?							Please describe
- If yes, do GO issuance statistics have a separate category for energy released from storage?							Please describe

Member States reporting to EC on GO statistics and renewable energy consumption

Which principles do you use to report GO statistics and renewable energy consumption in Annex XVI of the Commission Implementing Regulation (EU) 2022/2299?							Link to Commission Implementing Regulation
Do the reported figures differ from your published GO statistics?	No						Yes/No
- If yes, how do they differ?							Please describe
Do the reported figures differ from the reported consumption data for the annual residual mix exercise?	No						Yes/No
- If yes, how do they differ?							Please describe

Issuing and cancelling of Guarantees of Origin

Unit of energy represented by a GO							
Is the unit of a GO MWh?	Yes						Yes/No
Do you use smaller units than MWh for GOs?	No						Yes/No
Is the standard size for smaller size GOs equal to 1 MWh?	Not applicable						Yes/No
- If no: please specify							please specify

Usage of ex-domain cancellations							
Do you issue your GOs under the European Energy Certificate System (ECCS) of AIB?	Yes						Yes/No
Do you allow for ex-domain cancellations, which means cancelling a GO in your registry for the usage in another registry?	Yes						Yes/No
- If yes, please describe under which conditions?	Only if a cancellation agreement is in place as provided for in EECs Rules						please describe
- If yes, are ex-domain cancellations reported to the AIB for statistical purposes?	Yes						Yes/No
How do you ensure that GOs, cancelled for another domain, are not also claimed for consumption in your own domain?	Since they are cancelled for use in another domain they cannot be claimed for use within the Greek Domain. The cancellation statement issued explicitly states the country of consumption.						please describe

Production data sources							
What is the data source for production data?	The Transmission System Operator and the Distribution Network Operator						Please specify
- If possible, link to data source	Not publicly available link						Please specify the website for the data source and which party is in charge
When are the statistics based on production measurement data available for calendar year X?	By end of February X+1						Please specify yearly deadline
Is production data available with (sub)hourly granularity?	No					They can be available by request to the competent Measurement Body	Yes/No
- If yes, which production categories?							Please specify
- If yes, what is the granularity of the data?						15 mins	10mins/15mins/20mins/...
- If yes, how long after the production period is the data available?						Not in place yet	Please specify

GO usage per system boundary							
Do you have rules in place that restrict the usage of GOs to a certain system boundary?	Not applicable						Yes /No (E.g. are there restrictions for where to use electricity GOs? Can hydrogen GOs be used for consumption from the natural gas grid? Can biomethane GOs be used for consumption from a hydrogen grid? Any specifics on vehicle transported gases? Restrictions on where heating and cooling GOs can be used? e.g. can heating and cooling GOs be exported? can they be used on another heating grid than where they were produced? etc)
- If yes, please specify							Please specify
Does your member state provide GO cancellation statistics for energy that changes dissemination level during its chain of custody?	Not applicable						Yes/No
Do you distinguish different types of GO cancellations: cancellations for final energy consumption vs. GO cancellation for input into energy carrier conversion, for storage, or other?	At the moment only for final energy consumption.						Yes/No/Please specify
Does your member state provide statistics on GOs that are cancelled for input into energy carrier conversion (= for GO Conversion Issuance)?	Not applicable						Yes/No
Link to the detailed cancellation statistics							Please provide weblink

Disclosure

General							
Does your member state have a disclosure obligation for origin of supplied/consumed energy?	Yes						Yes/No
- If yes, To which economic operators does it apply?	Energy suppliers						Please specify (categories like: regulated suppliers, corporate consumers, all, ...)

	<p>- Law 3426/2005, Article 17 (Official Government Gazette B'309/22-12-2005)</p> <p>- Law No. 3468/2006 Article 15 (Official Government Gazette, First Bulletin, Sheet No.129, June 27, 2006 as revised by Law No 4951/2022, Official Government Gazette, First Bulletin, Sheet No.129, July 4,2022)</p> <p>- Law No 4001/2011, Article 48 (Official Government Gazette A'179/22-08-2011)</p> <p>- Supply Regulation, Article 13 (Official Government Gazette B'832/09.04.2013)</p> <p>- Law 4512/2018, Articles 97, 98 (Official Government Gazette A'5/17.01.2018)</p> <p>- Ministerial Decision No 81331/3661, Article 11 (Official Governmental Gazette second bulletin sheet number 4246, August 10, 2022)</p> <p>- RAE Decision No 509/2018 (Official Government Gazette B' 2307/18.06.2018)</p> <p>- RAE Decision No E-47/2023</p>							Please name the relevant regulations and provide a reference (preferably a version in English)
- If yes, Under what rules it is governed?								
who is the Competent Body in charge for the supervision of disclosure?	DAPEEP							Please specify name
- Under which legal nomination (law/decrete/decision) are they appointed as competent body?	DAPEEP is appointed as the Competent Body for disclosure according to Law 4512/2018							Provide reference to legal nomination
Are GOs the only instrument for disclosing known origin in disclosure statements to final customers?	Yes							Yes/No
- If no, please specify the other instruments								Please specify
Which measures are in place for supervision of suppliers regarding their disclosure of the origin of the gas of their supply?								Gas only, please describe
Do suppliers submit samples of their invoices to the disclosure supervisor?	Not yet							Yes/No. Disclosure supervisor for electricity : the authority supervising the obligation on suppliers to inform their clients about their supplier mix and product mix according to Electricity Directive 2019/944, Annex I, Article 5 Disclosure of energy sources.
Is there a public report on the result of the disclosure supervision?	Not yet							Yes/No
- If yes, where can it be found?								Please specify
If a supplier is active in multiple Member States: does the supplier mix in your country/region account for this?	No							Yes/No
- If yes: how does this influence the supplier mix in your country/region?								Please specify
Customer-specific disclosure								
Can a consumer cancel their own GOs?	Yes						Only for consumption covered by a PD installed behind the meter (net metering). In this case, the GOs issued for electricity produced and not injected to the grid, are cancelled in favor of the internal consumption.	Yes/No.
Can other parties than licensed suppliers cancel GOs?	Yes						Beside autoproducers (i.e. net metering), producers having a direct PPA with an end consumer can cancel GOs for the electricity delivered through this PPA. In order DAPEEP to allow such transaction the producer must submit the PPA to DAPEEP as evidence.	Yes/No.

When offered energy products include claims on the origin of the energy, are they always exclusively based on cancelled GOs? - If no: please specify	Yes						Yes/No please specify: when are deviations possible, what are claims based on otherwise.
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Calculations of Residual Mixes

Gas only: Does your Member State calculate the residual mix for gases? - If yes, which method is used to determine this? - If yes, who calculates the Residual Mix in your Member State? - Weblink to the results of the national publication of the residual mix							Yes/No Please specify Name of organisation weblink or explanation from when onwards this is expected
Electricity only: Do you use the data of the Residual Mix calculated by the AIB? - If no, please specify which data you use?	No Residual Mix is calculated by DAPEEP following a methodology approved by the Regulatory Authority for Energy, Water and Waste. This methodology is compliant with the Issuance Based method followed by AIB. DAPEEP uses the EAM (as long as Greece is a deficit country), compares RM figures calculated with RM figures published by AIB and communicates any discrepancies with view to finetune the procedure.						Yes/No Please specify

Information on Disclosure communication

Is the annual disclosure of the supplier mix displayed on the energy bill? - If no, please specify where it is displayed.	Not sure, see comment					Supervision of suppliers' bills falls under responsibility of RAEWW	Yes/No Please describe
Is disclosure information of different suppliers centrally available (e.g. reports) ?	Disclosure information is published on the 30th of June each year for the previous year.					https://www.dapeep.gr/dimosieusis/eguseis-proeleusis-energeiako/	Pls. Provide short explanation plus reference to website/regulation.
If not, how is such consumption demonstrated and how is it reflected in the residual mix? Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.	N/A						Pls. Provide short explanation plus reference to website/regulation.

Consumption data

What is the data source for consumption data? - If possible, link to data source	The Transmission System Operator and the Distribution Network Operator.						Please specify Please specify the link to the data source
When are the statistics based on consumption measurement consumption data available for the calendar year X?	By the end of February X+1						Please specify

Timeline of disclosure

When is the residual mix communicated to suppliers?	30th June X+1						Indicate approximate timing every year
When do suppliers provide disclosure figures (product mixes) to the disclosure authority?	DAPEEP gets the data to calculate RM and Suppliers Mix each year in April regarding the measurements of the previous year by the competent measurement bodies						Indicate approximate timing every year
When does the disclosure authority validate and publish the disclosure figures: product mixes, supplier mixes, other disclosure mixes (if applicable)?	30th June X+1						Indicate approximate timing every year
When do the suppliers inform their clients about the disclosure figures?	Although there is no provision for a specific deadline, usually by September X+1 they include the disclosure figures of year X in their bills or commercial material.						Indicate approximate timing every year. E.g., is it by the 1st September of year X+1 for disclosure figures of year X or another deadline?

Union Database (UDB) and disclosure supervision

Will a link between GO Registry and UDB be provided in your domain? <i>- If yes: which institution/authority will provide</i>							Yes/No Please provide name of institution/authority
Will the Disclosure Competent Body have access to the UDB?							Yes/No
What mechanism is in place for the interaction between the GO registry and the UDB? <i>- If none yet, what ideas or plans are there regarding the future for this interaction between GOs and UDB?</i>							Please describe Please describe
Is data from the Union Database for sustainable biofuels checked to confirm the location of renewable energy consumption? <i>- If yes, please describe the principles of this check</i>							Yes/No Please describe
Is a consistency check done regarding information in the UDB and the beneficiary of cancelled GOs for the same gas?							Please describe

Other issues

Full disclosure

Have you implemented a full disclosure system in your country? <i>- If yes, since when?</i>	No						Yes/No Please specify date of entry into force
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Purposes of the GO

Do GOs have a function in terms of target compliance and are used as support instrument?	No						Yes/ No (in case all GOs are linked to disclosure)
Is a GO the only "tracking certificate" used? <i>- If no: Are any other tracking systems of a similar purpose and function as GO closely coordinated with GO?</i> <i>- If no: please name the other organisations active in the market (voluntary schemes/non governmental bodies/private initiatives), their role and the task they perform.</i>	Yes						Yes/No Please specify
Besides GO, is there only the Residual Mix available for usage for disclosure? <i>- If no, please specify</i>	Yes						Yes/No (No meaning there are other tracking mechanisms accepted) Please specify
Are GOs issued for self-consumed energy? <i>- If yes: what are the rules on disclosure for such GOs?</i>	Yes						Yes/No Please specify
		They are issued and cancelled immediately. Since self consumed electricity is not represented by a supplier both issued and cancelled GOs are not taken into account in Residual Mix calculations. They are used by the consumer to prove the origin of the electricity consumed through onsite production without absorption from the grid (usually for reporting reasons)					

Regulations on Power Purchase Agreements (PPAs)

In terms of disclosure, how do you treat energy that is bought in a competitive setting or in a long-term power purchase agreement?							Please describe
Who is responsible for disclosing/cancelling the GOs for competitive settings or long-term purchase agreements?							supplier/plant operator/customer? Please specify

Section B

Information on Environmental Parameters

Does the supplier mix include information on environmental impacts?	Yes						Yes/No. Note the legal requirement for such information for electricity: Electricity Directive 2019/944, Annex I, Article 5(b)
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