



## *Business Process*

# **Importing Guarantees of Origin**

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**1 DOCUMENT TRACKING**

Version	Author	Content	Date
1.0	SEMO & CER	Final version as approved by CER	01/12/2011
1.1	SEMO	Update to reflect changes to processes	13/08/2012
1.2	SEMO	Update to reflect implementation of Online Registry, becoming members of the Association of Issuing Bodies (AIB) and connecting to the AIB trading hub	31/07/2015

## 2 PROCESS CONTEXT

### 2.1 BACKGROUND

Directive 2001/77/EC introduced the concept of Guarantees of Origin (GO) certificate for electricity. The Renewables Directive<sup>1</sup> 2009/28/EC replaces Directive 2001/77/EC and Article 15 of the Renewables Directive further develops GO certificates. The directive states that the purpose of a GO is for Fuel Mix Disclosure and that the GO certificate does not need to follow the physical flow of electricity. This legislation was transposed in Ireland by S.I. 147 of 2011 (replaced by S.I. 483 of 2014); the Statutory Instrument places the obligation for issuing GO certificates in Ireland on the Single Electricity Market Operator (SEMO) subject to the Supervisory Framework<sup>2</sup> developed by the CER, in consultation with SEMO and the industry.

In accordance with the Directive, GO certificates from other Member States will be accepted for Fuel Mix Disclosure in Ireland. Given that GO certificates do not need to follow the physical flow of electricity, Account Holders in the GO scheme in Ireland are free to import GO certificates from other Member States, regardless of Interconnector activity, subject to those GO certificates being eligible for transfer (e.g. not already used for Fuel Mix Disclosure). Once correctly imported, the foreign GO certificate will act as any other GO certificate in Ireland and may be transferred or used for Fuel Mix Disclosure, subject to the rules in the relevant processes and the CER's decision paper on the Supervisory Framework for GOs (CER/11/824).

### 2.2 PROCESS SCOPE

This document outlines the process for the validation and completion of GO imports.

It does not cover any of the following processes:

- Registering for the GO scheme
- Issuing GO certificates (including Requesting)
- Transferring GO certificates
- Withdrawal of GO certificates

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<sup>1</sup> Transposed by the [Renewables Obligation \(Amendment\) Order \(Northern Ireland\) 2010](#) in Northern Ireland and by S.I. 147 of 2011 (replaced by No. 483 of 2014) in Ireland.

<sup>2</sup> [Supervisory Framework for Administration of Guarantees of Origin CER/11/824](#)

### 3 BUSINESS OBJECTIVE

The objective of this business process is to meet the obligations SEMO has under S.I. 147 of 2011 (replaced by S.I. 483 of 2014), namely:

*10. (1) The supervisory framework established by CER shall provide for the recognition of guarantees of origin issued by other Member States in accordance with Article 15(9) of the Directive.*

*(2) SEMO, acting in accordance with the supervisory framework may refuse to recognise a guarantee or origin issued by another Member State only where it has well-founded doubts about the accuracy, reliability or veracity of the guarantee of origin and in such a case shall notify the Minister and the European Commission of such a refusal and its justification.*

Where Article 15(9) of the Directive states:

9.

*Member States shall recognise guarantees of origin issued by other Member States in accordance with this Directive exclusively as proof of the elements referred to in paragraph 1 and paragraph 6(a) to (f). A Member State may refuse to recognise a guarantee of origin only when it has well-founded doubts about its accuracy, reliability or veracity. The Member State shall notify the Commission of such a refusal and its justification.*

SEMO is bound to follow the Supervisory Framework as set out in the decision paper CER/11/824 “Supervisory Framework for Administration of Guarantees of Origin” and all amendments to said framework.

## 4 PROCESS OVERVIEW

### 4.1 TERMINOLOGY

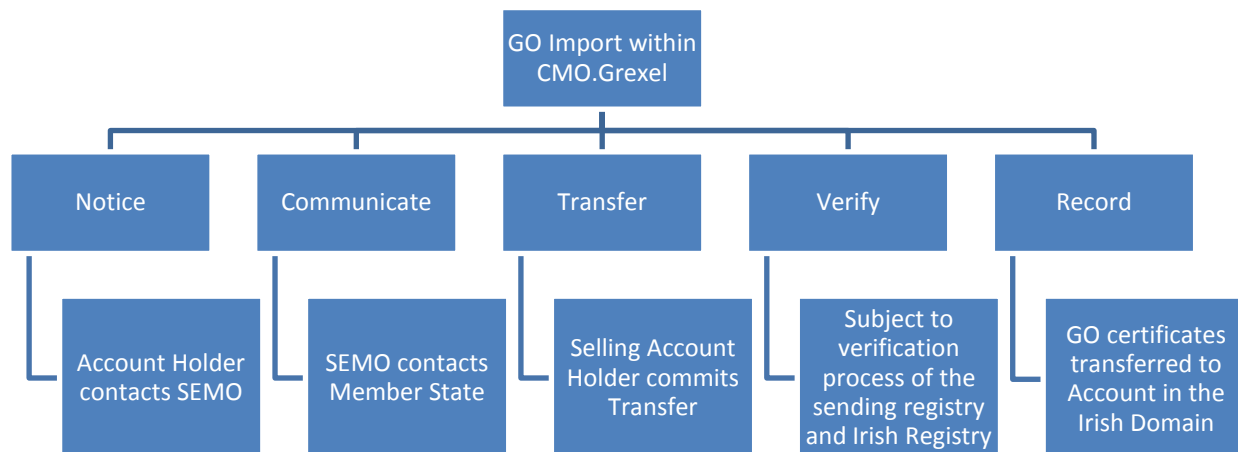
Previous Terminology	GO Online Registry Terminology
Generator	Producer
Supplier	Supplier
GO Participant	Account Holder
Generator Unit	Production Device
Authorised User	Account Holder User (see appendix 9.3)
Revocation	Withdrawal

### 4.2 GO IMPORT FROM DOMAIN WITHIN CMOGREXEL PROCESS OVERVIEW

The selling Account Holder in the sending domain initiates the electronic transfer in their registry. The success of the transfer from an account in a domain within CMO.Grexel is subject to the verification process of the sending registry and the Irish registry. The receiving Account Holder can use the *Search Transactions* report function in the GO Online Registry to view the status of the import, the transaction status will show as completed.

Visit [cmo.grexel.com](http://cmo.grexel.com) to view the list of countries that CMO.Grexel is currently the registry provider for.

Figure 1 below shows the GO Import process from a domain within CMO.Grexel:



**Fig. 1 GO Import from domain within CMO.Grexel**

The process is summarised in the five main activities below:

#### 4.2.1 NOTICE

The Account Holder informs SEMO of their intent to import GO certificates from another domain (Member State) via email to [guaranteesoforigin@sem-o.com](mailto:guaranteesoforigin@sem-o.com)

The Account Holder must provide details of the GO certificates, including previous holder and the name of the domain (Member State) from which the GO certificates are being imported. These details are necessary to check the validity of the GO certificates being imported.

SEMO will send an acknowledgement email to the Account Holder to confirm that the notice to import has been received and is being processed.

SEMO will send this within 1 working day of receiving the request from the Account Holder.

#### 4.2.2 COMMUNICATE

SEMO will contact the domain (Member State) which issued the GO certificates in order to verify their validity. SEMO will contact the competent body of the other domain (Member State) within 1 working day of receipt of the request, subject to the availability of contact details.

SEMO must ensure for the purposes of risk mitigation and fraud detection that the GO certificates exist and are eligible for transfer (i.e. they are not already cancelled or have not been used for Fuel Mix Disclosure).

If the competent body of the domain (Member State) informs SEMO that the GO certificates are invalid, the import request will be rejected and a notification of rejection will be issued by email to the Account Holder in Ireland who sent the notice to import.

If no response is received from the domain (Member State) within 10 working days the import will be rejected.

If the competent body of the domain (Member State) informs SEMO that the GO certificates are eligible for import, notification will be issued by email to the Account holder in Ireland who sent the notice to import.

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#### 4.2.3 TRANSFER

The selling Account Holder in the sending domain initiates the electronic transfer as per the process in their registry.

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#### 4.2.4 VERIFY

When transferring GO certificates from an account in a domain within CMO.Grexel, the success of the transfer is subject to the verification process of the sending registry and the Irish registry.

On verification pass, the GO certificates transfer will be recorded (see section 4.2.5).

If the selling Account Holder experiences issues with the verification of the transfer they should contact their Registry Operator. The sending Registry Operator will liaise with SEMO. If required, the issue will be escalated to the GO Online Registry provider, Grexel Systems, to investigate.

On verification fail, the GO certificates transfer will not be processed, the GO certificates will not be received into the account in the Irish registry.

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#### 4.2.5 RECORD

Upon verification, the GO certificates will be received into the account in the Irish registry.

On receipt of imported GO certificates, the Account Holder User will be notified via an alert in the GO Online Registry. Alerts are visible to Account Holder Users upon log in to the GO Online Registry. Only Account Holder Users subscribed to 'GO' alerts will receive these alerts via email. The process for subscribing to alerts can be found in section 4.7 of the GO Registration Business Process.

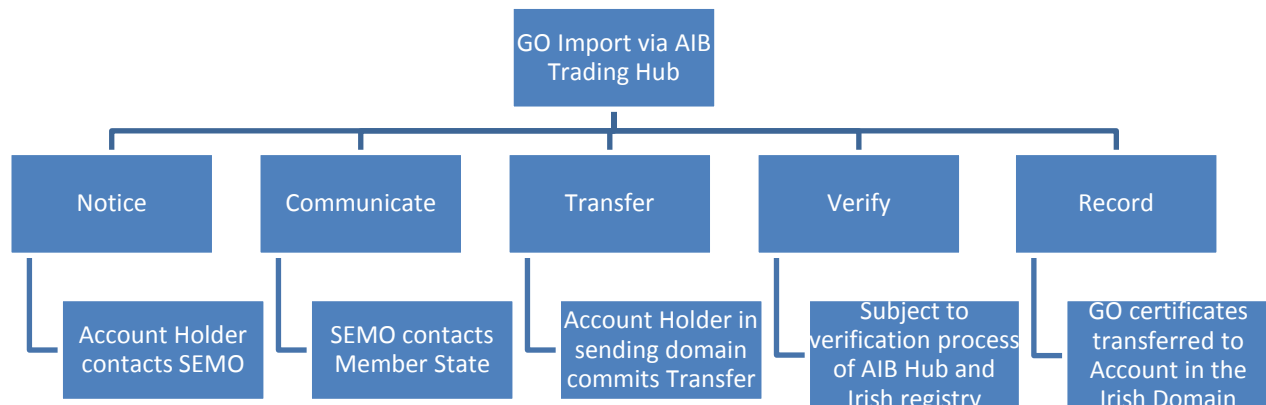
The receiving Account Holder shall use the Search Transaction report function in the GO Online Registry to check that the transfer transaction has completed.

### 4.3 GO IMPORT VIA AIB HUB PROCESS OVERVIEW

The selling Account Holder in the sending domain completes and submits the GO transfer in their registry, the success of the transfer from an account in a different registry is subject to the verification process of the Association of Issuing Bodies (AIB) trading hub and the Irish registry.

Figure 2 below shows the GO Import process via the AIB trading hub:





**Fig.2 GO Import via AIB Trading Hub**

The process is summarised in the five main activities below:

#### 4.3.1 REQUEST

The Account Holder informs SEMO of their intent to import GO certificates from another domain (Member State) via email to [guaranteesoforigin@sem-o.com](mailto:guaranteesoforigin@sem-o.com)

The Account Holder must provide details of the GO certificates, including previous holder and the name of the domain (Member State) from which the GO certificates are being imported. These details are necessary to check the validity of the GO certificates being imported.

SEMO will send an acknowledgement email to the Account Holder to confirm that the notice to import has been received and is being processed.

SEMO will send this within 1 working day of receiving the request from the Account Holder.

#### 4.3.2 COMMUNICATE

SEMO will contact the domain (Member State) which issued the GO certificates in order to verify their validity. SEMO will contact the competent body of the other domain (Member State) within 1 working day of receipt of the request, subject to the availability of contact details.

SEMO must ensure for the purposes of risk mitigation and fraud detection that the GO certificates exist and are eligible for transfer (i.e. they are not already cancelled or have not been used for Fuel Mix Disclosure).

If the competent body of the domain (Member State) informs SEMO that the GO certificates are invalid, the import request will be rejected and a notification of rejection will be issued by email to the Account Holder in Ireland who sent the notice to import.

If no response is received from the Member State within 10 working days the import will be rejected.

If the competent body of the domain (Member State) inform SEMO that the GO certificates are eligible, notification will be issued by email to the Account Holder in Ireland who sent the notice to import.

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#### 4.3.3 TRANSFER

The selling Account Holder in the sending domain initiates the electronic transfer as per the process in their registry.

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#### 4.3.4 VERIFY

When transferring GO certificates from an account in a different registry, the success of the transfer is subject to the verification process of the AIB hub and the Irish registry.

On verification pass, the GO certificates transfer will be recorded (see section 4.3.5).

On verification fail, the GO certificate transfer will not be processed, the GO certificates will not be received into the account in the Irish registry.

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#### 4.3.5 RECORD

Upon verification, the GO certificates will be received into the account in the Irish registry.

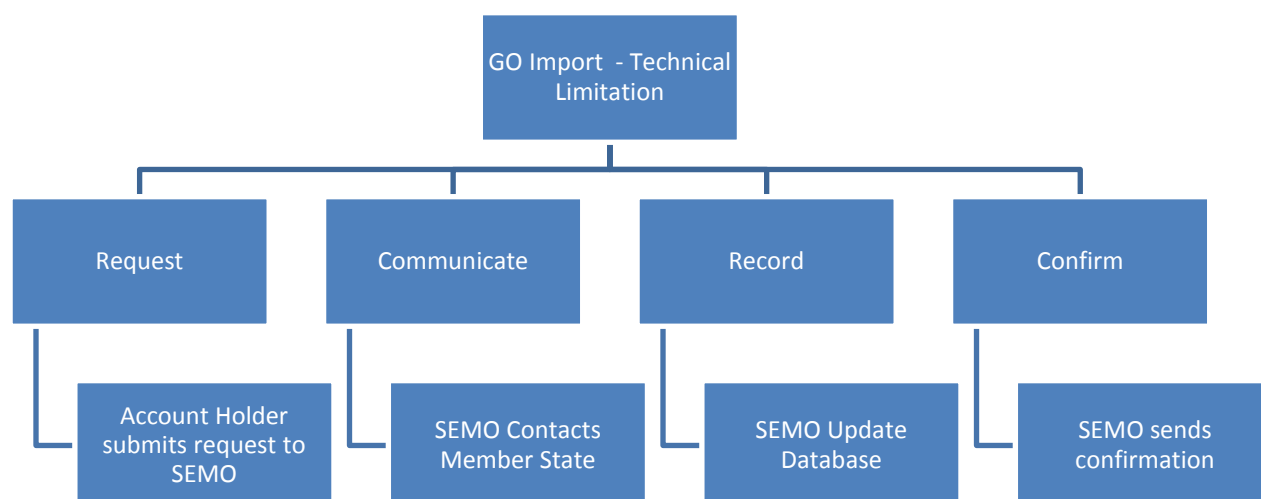
On receipt of imported GO certificates, the Account Holder User will be notified via an alert in the GO Online Registry. Alerts are visible to Account Holder Users upon log in to the GO Online Registry. Only Account Holder Users subscribed to 'GO' alerts will receive these alerts via email. The process for subscribing to alerts can be found in section 4.7 of the GO Registration Business Process.

The receiving Account Holder shall use the Search Transaction report function in the GO Online Registry to check that the transfer transaction has completed.

### 4.4 GO IMPORT – TECHNICAL LIMITATION PROCESS OVERVIEW

Where it is impossible to import GO certificates for technical reasons, this can be overcome by the selling Account Holder cancelling GO certificates for use in Fuel Mix Disclosure in Ireland. This can only be done with the agreement of both the sending domain and SEMO. Account Holders must contact SEMO to request such an import. Requested imports will be assessed on a case by case basis.

Figure 3 below shows the GO Import –Technical Limitation process:



**Fig.3 GO Import – Technical Limitation**

The process is summarised in the four main activities described below:

#### 4.4.1 REQUEST

The Account Holder informs SEMO of their intent to import of GO certificates from another domain (Member State) by completing the GO Import Request template and emailing to [guaranteesoforigin@sem-o.com](mailto:guaranteesoforigin@sem-o.com) along with a cancellation statement from the sending registry. SEMO will send an acknowledgement email to the Account Holder to confirm that the request has been received and is being processed.

SEMO will send this within 1 working day of receiving the request from the Account Holder.

The Account Holder must provide details of the GO certificates, including previous holder and the name of the domain (Member State) from which the GO certificates are being imported. These details are necessary to check the validity of the GO certificates being imported.

As part of this check SEMO will ensure that all information required for a GO as detailed in S.I. 147 of 2011 (replaced by S.I. 483 of 2014) is included. Any GO certificates missing this information will be rejected. SEMO will complete this check within 2 working days of receipt of request.

#### 4.4.2 COMMUNICATE

SEMO will contact the domain (Member State) which issued the GO certificates in order to verify their validity within 1 working day of receipt of the request, subject to the availability of contact details.

SEMO must ensure for the purposes of risk mitigation and fraud detection that the GO certificates exist and are eligible for transfer (i.e. they are not already cancelled or have not been used for Fuel Mix Disclosure).

If the competent body of the Member State informs SEMO that the GOs are invalid, the import request will be rejected and a notification of rejection will be issued by email to the Account Holder in Ireland who sent the request.

If no response is received from the Member State within 10 working days the import will be rejected. An email will be sent to the Account Holder to inform them that the import has been rejected and this will be sent within 1 working day

If the competent body of the Member State informs SEMO that the GOs are eligible, notification will be issued by email to the Account Holder in Ireland who sent the request.

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#### 4.4.3 RECORD

After SEMO has checked the details and when the GO certificates have been confirmed as eligible for import by the relevant domain (Member State), the GO certificates will be added to the GO certificate database<sup>3</sup>.

SEMO will do this within 2 working days of receipt of response from the Member State.

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#### 4.4.4 CONFIRM

SEMO will send a notice of completion to the Account Holder to inform them that the GO certificates have been imported to the GO certificate database.

A confirmation email will be sent within 1 working day of updating the database.

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<sup>3</sup> This does not refer to the GO Online Registry. It refers to a separate Microsoft Access databases that is maintained for tracking GO certificates imported from domains that are not members of the AIB

## 5 ROLES AND RESPONSIBILITIES

### 5.1 SEMO MARKET OPERATIONS

Under S.I. 147 of 2011 (replaced by S.I. 483 of 2014) SEMO has the following obligations relating to importing GOs from other Member States:

*10. (1) The supervisory framework established by CER shall provide for the recognition of guarantees of origin issued by other Member States in accordance with Article 15(9) of the Directive.*

*(2) SEMO, acting in accordance with the supervisory framework may refuse to recognise a guarantee of origin issued by another Member State only where it has well-founded doubts about the accuracy, reliability or veracity of the guarantee of origin and in such a case shall notify the Minister and the European Commission of such a refusal and its justification.*

Where Article 15(9) of the Directive states:

*9. Member States shall recognise guarantees of origin issued by other Member States in accordance with this Directive exclusively as proof of the elements referred to in paragraph 1 and paragraph 6(a) to (f). A Member State may refuse to recognise a guarantee of origin only when it has well-founded doubts about its accuracy, reliability or veracity. The Member State shall notify the Commission of such a refusal and its justification.*

### 5.2 ACCOUNT HOLDERS

As per the CER decision paper CER/11/824, Account Holders in the GO scheme in Ireland who wish to import GOs to the Irish GO registry are obliged to contact SEMO. Only those GO certificates whose validity has been confirmed by the relevant competent authority will be accepted into the Irish registry.

### 5.3 ISSUING BODY OF OTHER MEMBER STATE

The competent body of the other Member State has the following obligations under regulation 15 of 2009/28/EC (the Directive):

*4. Member States or designated competent bodies shall supervise the issuance, transfer and cancellation of guarantees of origin. The designated competent bodies shall have non-overlapping geographical responsibilities, and be independent of production, trade and supply activities.*

*5. Member States or the designated competent bodies shall put in place appropriate mechanisms to ensure that guarantees of origin shall be issued, transferred and cancelled electronically and are accurate, reliable and fraud-resistant.*

6 PROCESS DESCRIPTION

6.1 PROCESS SWIMLANE

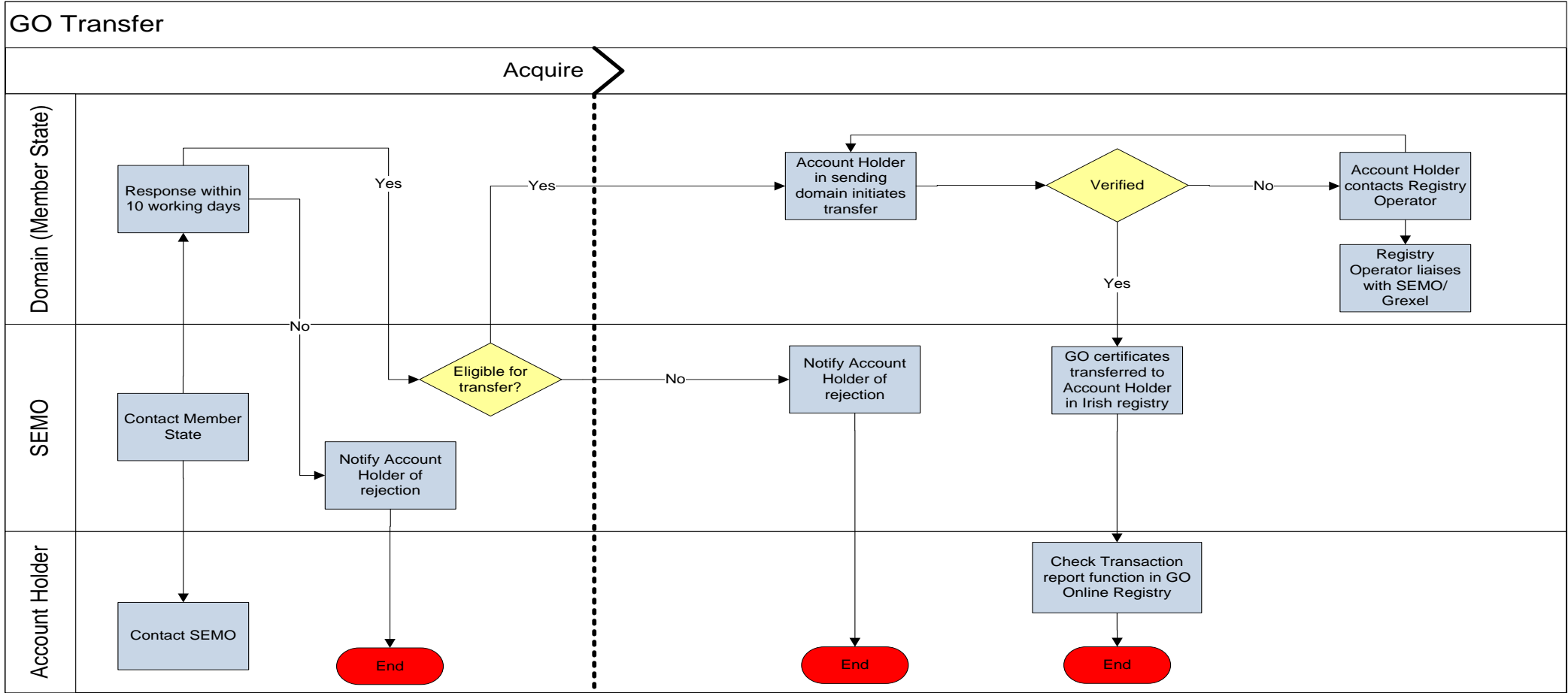


Fig. 5 GO Import within CMO.Grexel Process

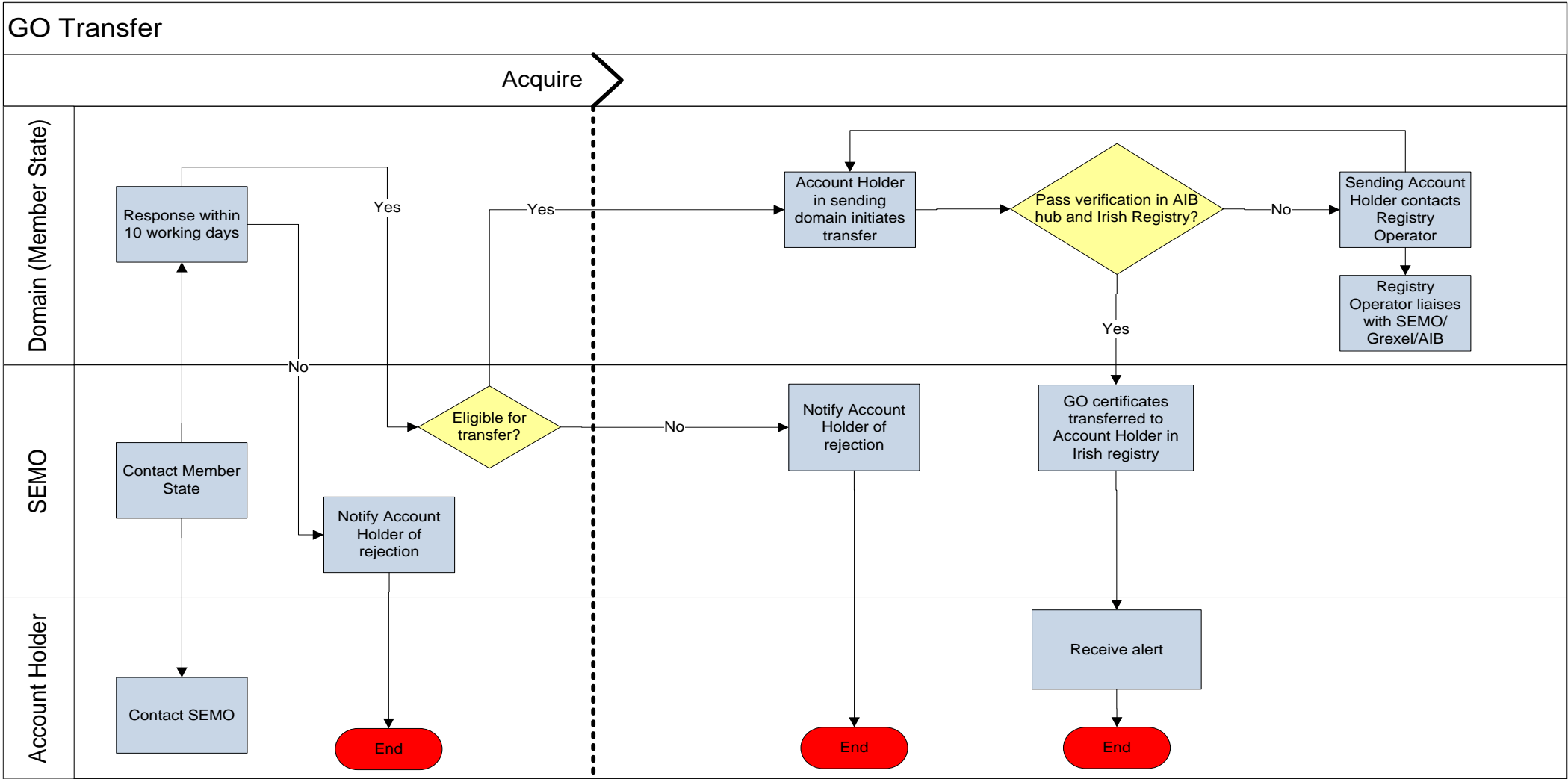
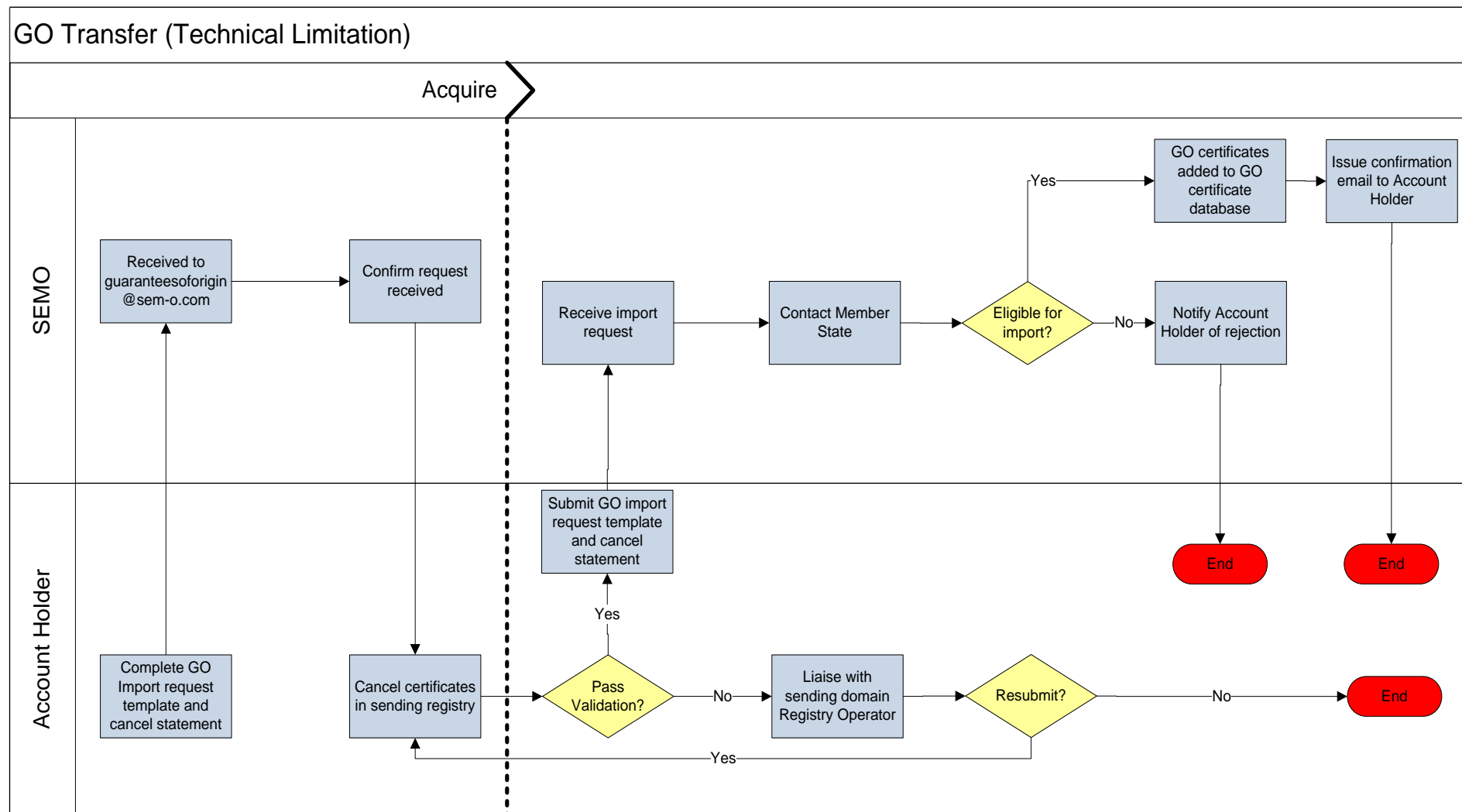


Fig. 6 GO Import from AIB Member Process



**Fig. 7 GO Import – Technical Limitation - Process**



## 6.2 IMPORT FROM CMOGREXEL PROCESS STEPS

Step	Step Name	Step Description	Timing
1	Notice	Account Holder contacts SEMO informing them of their intent to import GO Certificates from another Member State within the CMO.Grexel registry.	AD Hoc
2	Communicate	SEMO contacts the Member State which issued the GO in order to verify its validity. If the GO certificates are invalid the import request will be rejected.	Within 1 WD of receipt
3	Transfer	The Selling Account Holder commits the transfer.	On completion of step 2
4	Verify	The success of the transfer is subject to validation in the sending registry.	On completion of step 3
5	Record	Account Holder shall use the Search Transaction report function in the GO Online registry to check that the transfer has completed successfully.	On completion of step 4

### 6.3 IMPORT FROM AIB MEMBER PROCESS STEPS

Step	Step Name	Step Description	Timing
1	Notice	Account Holder contacts SEMO informing them of their intent to import GO Certificates from another Member State.	Ad Hoc
2	Communicate	SEMO contacts the Member State which issued the GO in order to verify its validity. If the GO certificates are invalid the import request will be rejected.	Within 1 WD of receipt
3	Transfer	The Account Holder in the sending domain initiates the electronic transfer as per the process in their registry.	On completion of step 2
4	Verify	The success of the transfer is subject to the verification process of the AIB trading hub and Irish registry.	On completion of step 3
5	Record	<p>On receipt of imported GO certificates, the Account Holder User will be notified via an alert in the GO Online Registry. Alerts are visible to Account Holder Users upon log in to the GO Online Registry. Only Account Holder Users subscribed to 'GO' alerts will receive these alerts via email.</p> <p>The Account Holder can use the Search Transaction report function in the GO Online registry to check that the transaction has completed.</p>	On completion of step 4

## 6.4 IMPORT FROM TECHNICAL LIMITATION MEMBER PROCESS STEPS

Step	Step Name	Step Description	Timing
1	Submit import request	The Account Holder contacts SEMO informing of their intent to import GO Certificates from another Member State and providing details of the GO and previous holder of the certificates.	Ad Hoc
2	Receive request	SEMO receives the request, and sends an acknowledgement email to the Account Holder.	Within 1 WD of receipt
3	Validates data	SEMO checks for all of the necessary fields required according to S.I. 147 of 2011 (replaced by S.I. 483 of 2014).	Within 2 WD of receipt
4	Contact Member State	SEMO contacts the Member State of the current GO Account Holder asking them to confirm that the GOs for transfer exist and are eligible for transfer. If not, the request is rejected.	Within 1 WD of validation
5	Response from Member State	Member State responds to SEMO and either confirms or does not confirm the validity of the relevant GOs.	Within 10 WD of previous step
6	Update Database	SEMO updates the GO certificate (import) database with the details of the new imported GOs.	Within 2 WD of Member State response
7	Advise GO holder	SEMO sends a confirmation email to the new Account Holder that the database has been updated. However, in the event that an import has been rejected, SEMO will send notice to this effect to the Account Holder.	Within 1 WD of step 5 or 6 as appropriate

Step	Step Name	Step Description	Timing
1	Account Holder checks GO Account	The Account Holder checks the GO Account to see if the GO import has been processed successfully. The Transaction Log will also show the import as successful.	Ad Hoc
2	Account Holder contacts SEMO	In the case that an import has failed, the Account Holder can contact SEMO to investigate the issue	Ad Hoc
3	SEMO contacts the Issuing Body of the relevant Member State	SEMO will contact the Issuing Body of the relevant Member State to confirm the validity of the import and to investigate the issue.	Ad Hoc
4	SEMO advises Account Holder of the outcome	SEMO will advise the Account Holder of the outcome, whether it is confirmation of an invalid import or evidence of a successful import.	Ad Hoc

## 7 PROCESS REFERENCES

### 7.1 PROCESS RULE DOCUMENTS

The following table provides references to the documents that govern the design of this business process.

Document	Title	Version	Section	Description
S.I. 147 of 2011 (replaced by S.I. 483 of 2014)	European Communities (Renewable Energy) Regulations 2011	N/A		Transposes EU directive to Irish law and names SEMO as the issuing body for GOs
Decision Paper CER/11/824	Supervisory Framework for Administration of Guarantees of Origin	N/A		Establishes the Supervisory Framework for the administration of Guarantees of Origin. Sets out specific detail of the GO scheme.
Directive 2009/28/EC	DIRECTIVE 2009/28/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC	N/A	Regulation 15	EU directive which sets out rules for GOs. Has been transposed by S.I. 147 of 2011 and is common source of law between Ireland and other Member States

### 7.2 RELATED DOCUMENTS

The following table provides a list of documents that are related to this business process.

Document	Title	Version	Relationship	Description
SEMO Business Process Model	SEMO Business Process Overview	1.0	Parent Document	Overview of the model used for the SEMO Business Processes. Provides the context for where each business processes fits into SEMO.
Decision Paper CER/11/095	Fuel-Mix Disclosure in the Single Electricity Market: Calculation Methodology Decision Paper	N/A	Related Process	Decision paper outlining the process for Fuel Mix Disclosure which is the sole purpose of GOs.

## 8 ASSUMPTIONS

The following is a list of assumptions for this process document:

- Imports from registries within CMO.Grexel will be initiated by the sending Account Holder
- Imports from a different registry will be initiated by the sending Account Holder and will be subject to AIB trading hub verification
- Imports from Member States that are not members of AIB will be assessed on a case by case basis and may be facilitated by importing GOs to a Microsoft Access GO certificate database
- SEMO will be able to obtain contact details for the GO issuing body of other EU Member States and these issuing bodies will be able to verify GOs marked for import. Otherwise the details of imported GOs will be in some other way verifiable by SEMO
- Account Holders can contact SEMO via the Contact Us form in the Online Registry, by email [Guaranteesoforigin@sem-o.com](mailto:Guaranteesoforigin@sem-o.com) or by phone on +353 1 237 0468

## 9 APPENDICES

### 9.1 GLOSSARY

Abbreviation	Definition
DSO	Distribution System Operator
RA	Regulatory Authority
SEM	Single Electricity Market
T&SC	Trading and Settlement Code
TSO	Transmission System Operator
WD	Working Day (Working Day ends at 5 pm)
CER	Commission for Energy Regulation
S.I.	Statutory Instrument
GO	Guarantee of Origin

### 9.2 LIST OF DOMAINS IN CMO GREXEL



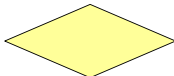


The list of Domains that are currently signed up to CMO Grexel can be found via the following hyperlink:


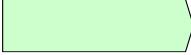




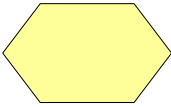
<http://cmo.grexel.com/default.aspx?AspxAutoDetectCookieSupport=1>

### 9.3 LIST OF MEMBERS OF AIB

[http://www.aib-net.org/portal/page/portal/AIB\\_HOME/FACTS/AIB%20Members/AIB%20Members](http://www.aib-net.org/portal/page/portal/AIB_HOME/FACTS/AIB%20Members/AIB%20Members)

### 9.4 PROCESS FLOWCHART KEY

FLOWCHART KEY	
	Process Trigger
	Process step
	Process decision / question
	Document
	Manual Input / Update

	Reference to another process
	Another business process to be implemented following current step (current step is a trigger for another process)
	Process end
	System
	Data
	System File
	Preparation