

13 June 2025

## Joint statement on the Spanish Guarantees of Origin Registry System

We - ACIE, APPA, ARMIE, ETE and UNEF - recognize and appreciate CNMC's efforts to enhance the guarantees of origin registry.

The publication of a calendar with estimated issuance dates helps market participants and consumers manage their commitments more effectively. Additionally, the changes made to simplify import requests have significantly streamlined operations.

We also welcome CNMC's willingness to implement structural improvements in the registry by automating processes and operations. However, with the continued growth of renewable generation and the increasing volume of guarantees of origin that the registry must handle, it is crucial to implement fully automated electronic systems as soon as possible to ensure efficient and secure operations.

Until an automated tool is developed, certain operational changes could be introduced in the short term. We understand that these adjustments would not require significant resource allocation yet would substantially improve registry operations for market participants. Some of these measures go beyond existing practices in certain jurisdictions, allowing CNMC to take an innovative approach in the short run.

We believe the following short-term improvements should be prioritized:

Proposal	Why	How
<b>1. Upgrade GO inventory</b>	Enable market participants track and have visibility of the GOs they hold in their account.	New feature in the registry. Inventory should be updated at least monthly, and should include: <ul style="list-style-type: none"> <li>- Volume hold</li> <li>- Expiration date</li> <li>- Generation date</li> <li>- Status</li> <li>- Month of production</li> <li>- Technology</li> <li>- CIL</li> <li>- Certificate number</li> <li>- Country of origin</li> <li>- Agent sending the GOs and beneficiary</li> </ul>
<b>2. Enable the use of a unique identifier of the generation plant</b>	Reduce administrative burden and probability of errors	Request identification number (CIL) only and eliminate the following fields: <ul style="list-style-type: none"> <li>- DNI/NIF</li> <li>- Name</li> <li>- Installed capacity</li> </ul>

<b>3. Reduce the number of files used</b>	Reduce administrative burden and probability of errors	Unify requests under a single file for all trades and facilities. Currently, requests can only be grouped by facility.
<b>4. Automate the issuance of GOs</b>	Reduce administrative burden on both CNMC and operators.	Eliminating the distinction between Domestic and Exportable GOs and issuing the certificates automatically on a monthly basis according to injection data as published by REE.
<b>5. Allow the creation/election of a “Master Account”</b>	Simplifying the management of GOs for developers with many assets	<ul style="list-style-type: none"> <li>- Extending to generation accounts the possibility of receiving GOs</li> <li>- Allowing the election of a Master Account (can be one of the existing or a dedicated one to be created) to which all GOs of the generation accounts connected to this Master Account, will be issued.</li> </ul>
<b>6. Automate the transfer of issued GOs</b>	Reduce the administrative burden on both CNMC and operators of the already issued GOs.	Once the GOs have been used, the holders of those GOs may have the ability of transfer them within accounts of the CNMC or to another registry under AIB connections similar to how wire transfers or EUA transfers work.

Finally, we acknowledge that several aspects of the current Spanish GO system are functioning well and should be preserved in the upcoming structural changes. Among these, we recognize the ability of generators to cancel GOs on behalf of suppliers as a particularly valuable feature.

We remain available to support CNMC in any way necessary to implement the proposed changes and invite CNMC to share the timeline for a comprehensive revision of the current system.