



LIST OF INSTALLATIONS

**Comments on the List of Installations for the
2008-2012 Period in Germany as of February 28th 2012**

IMPRINT

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THE 2012 INSTALLATION LIST, AS OF 28/02/2012

OVERVIEW OF ALLOCATION CHANGES

Between 30/09/2011 and 28/02/2012 four automatic changes und one manual change to the NAP were submitted by the DEHSt to the EU Commission and were uploaded to CITL by the end of February 2012 after the changes had been accepted by the Commission.

Thus, on 28/02/2012 1699 installations were subject to emissions trading. Eight installations had been added that were not included in the list by 30/09/2011.

Overall changes were made for 50 installations. Current changes about the list of 30/09/2012 are found in the “update” column of the list. The table below lists the cases and numbers of installations concerned, sorted by category in the installation list. Several changes may have been made to the same installation at different times.

Table 1: Overview of Allocation Changes

allocation status	category installation list	number of changes approved by COM						30/09/2011 to 28/02/2012
		28.02.2008	28/02/2008 to 30/11/2009	30/11/2009 to 28/02/2010	28/02/2010 to 30/11/2010	30/11/2010 to 28/02/2011	28/02/2011 to 30/09/2011	
no allocation changes		1665	1571	1619	1612	1623	1631	1649
added	new entrant		10	4	11	6	11	8
	entrance after 2008			1	1		1	
allocation changes in 2 nd TP	capacity extension		40	9	29	30	25	19
	closure		3	11	15	5	8	3
	exempt from ETS		1	6		9	3	7
	change of allocation - merger		1		2	0	1	8
	change of allocation		39	19	8	5	11	5
	change of allocation, capacity extension		2	1		2	0	
in NAP-table		1665	1667	1670	1678	1680	1691	1699
retrospectively exempt from ETS in 2 nd TP	revocation		1	2		4	1	
	revocation - merger		5					
	exempt from ETS before 2 nd TP		2		4			
out of NAP-table			8	2	4	4	1	
total		1665	1675	1672	1682	1684	1692	1699

The German overall budget (CAP) amounts to 2,258,796,905 emission allowances (EUAs).

The theoretical reserve¹ for new entrants amounts to 73,362,210 EUAs by 28/02/2012. As in the table, the amount of auctioned allowances has not been changed. In the trading period from 2008 to 2012 the annual auction volume amounts to 40 million emission allowances (basic amount)².

The emissions given for the years 2005 to 2010 show the current data of the emissions reports. Emissions 2011 were not available on February 2012.

1 Theoretical reserve: It is assumed that all allocations will be issued and potential retrospective claims will be honoured.

2 In addition, further allowances are auctioned to cover the costs incurred by the Federal Government to observe its function in context to emissions trading (refunding amount). In contrast to the basic amount, the annual refunding amount is taken from the new entrance reserve.

DIFFERENCES BETWEEN DEHST AND CITL REPRESENTATIONS

The NAP-list shows the annual allocations, based on DEHSt allocation notices. In CITL, however, allocations that could not be issued in the previous year are offset against the allocations of the following year. Thus, CITL is unable to show returned allowances, and the comparison of allocation quantities for individual years is open to misinterpretation (e.g. comparison between allocations and VET for 2008).

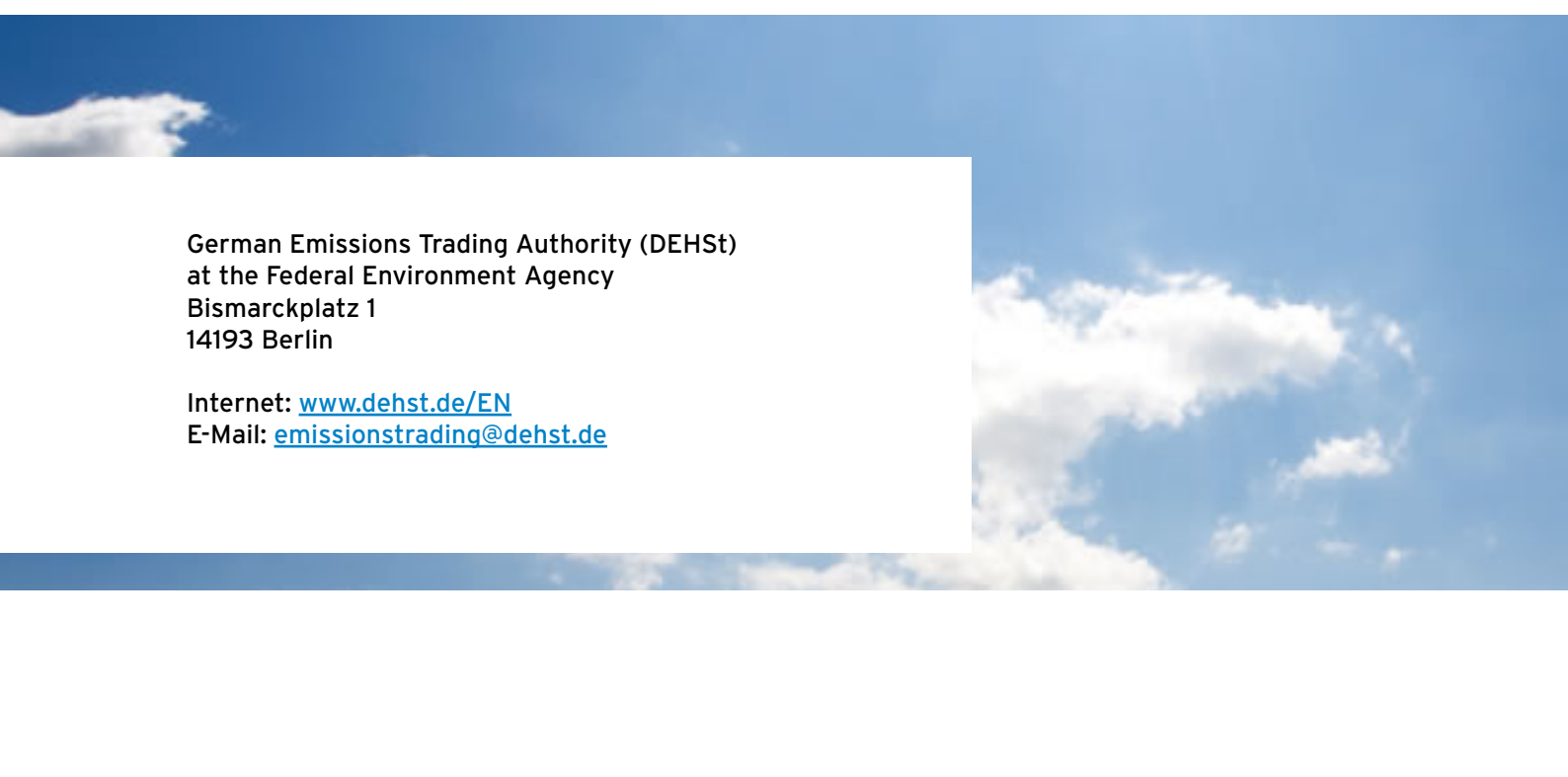
The following theoretical example highlights the differences: At the beginning of 2008, an installation was given an annual allocation of 100,000 emission allowances (EUAs). Following an appeal in 2009, the annual allocation is reduced to 75,000 EUAs. When the decision was taken, allocations for 2008 and 2009 had already been issued. Accordingly, DEHSt offsets the surplus of 2008 and 2009 (50,000 EUAs) against the allowances issued for the following year. The reserve is increased by 125,000 EUAs. This is reproduced by CITL and DEHSt as follows:

Example of Recording a Reduced Allocation						
Representation	2008	2009	2010	2011	2012	Total
DEHSt	75.000 EUAs	75.000 EUAs	75.000 EUAs	75.000 EUAs	75.000 EUAs	375.000 EUAs
CITL	100.000 EUAs	100.000 EUAs	25.000 EUAs	75.000 EUAs	75.000 EUAs	375.000 EUAs

When installations are decommissioned during the trading period, DEHSt will reclaim the relevant proportion of emission allowances for the year of decommissioning. The allocation is adapted accordingly in the DEHSt table. This cannot be shown in the CITL table:

Example of Recording the Decommissioning of an Installation in Mid-2009						
Representation	2008	2009	2010	2011	2012	Total
DEHSt	100.000 EUAs	50.000 EUAs	0 EUAs	0 EUAs	0 EUAs	150.000 EUAs
CITL	100.000 EUAs	100.000 EUAs	0 EUAs	0 EUAs	0 EUAs	200.000 EUAs

Thus, the allocation shown in CITL for 2009 deviates from the actual allocation issued by DEHSt by 50,000 EUAs, and the 50,000 do not figure in the reserve in the CITL record.



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