

unofficial translation

ENTRY TARIFF DISCOUNTS FOR RENEWABLE AND LOW-CARBON GAS

This instruction describes the process by which a shipper can receive an entry tariff discount for renewable or low-carbon gas injected into the Finnish gas system in Finland. The gas must be produced in a renewable or low-carbon gas production plant located in Finland, transported directly to an injection point, and physically injected into the gas grid from that point. The discount and subsequent refund are determined based on the injection case, capacity bookings, the verification of the production plant, and the provided certificates: the Guarantee of Origin (GO) and the Proof of Sustainability (PoS). All refunds are paid retroactively by 28 February each year for the previous calendar year, using the definition of a gas day.

An entry tariff discount requires valid capacity bookings. If the injected volume exceeds the booked capacity, any overrun fee will be refunded in proportion to the renewable share and only to the extent that certificates cover the entire amount. The refundable amount is determined on a monthly basis but refunded annually after the end of the calendar year. In a situation where part of the gas injected into the network is renewable and part is fossil, the shipper will be refunded, from the tariff revenues charged for the booked entry-capacity products, the proportion that corresponds to the share of renewable gas injected.

Example 1: Certificates less than the injected volume

	VOLUME (UNITS)	DISCOUNT	CERTIFICATES PROVIDED
RENEWABLE GAS	80	100 %	Yes (GO and PoS)
FOSSIL GAS	20	0 %	No
TOTAL	100	-	-

	VALUE / CALCULATION
ENTRY CAPACITY FEE (INCL. CAPACITY OVERRUN CHARGE)	10 000 €
REFUND	$10\,000\text{ €} \times (80 / 100) = \mathbf{8\,000\text{ €}}$

Example 2: Renewable, low-carbon and fossil gas

	VOLUME (UNITS)	DISCOUNT	CERTIFICATES PROVIDED
RENEWABLE GAS	50	100 %	Yes (GO and PoS)
LOW-CARBON GAS	30	75 %	Yes (PoS)
FOSSIL GAS	20	0 %	No
TOTAL	100	-	-

	VALUE / CALCULATION
ENTRY CAPACITY FEE (INCL. CAPACITY OVERRUN CHARGE)	10 000 €
REFUND	10 000 € × (0,5×1,00 + 0,3×0,75 + 0,2×0) = 7 250 €

The shipper must maintain monthly records of the injected quantities and the related certificates and provide this information to Gasgrid in accordance with Table 1.

RENEWABLE GAS
1. Direct physical connection from the production plant to the Finnish gas system, no container injection solution

This is the most automated process and does not require separate reporting, provided that the basic requirements, such as plant verification and issuance of GOs, are in order. **Requirement:** The verification of the renewable gas GO scheme is valid, and the production plant is eligible to receive GOs. All gas is injected into the transmission or distribution network.

Discount: 100 %, granted based on the tariff invoicing of the entry-capacity products. If not all gas injected into the network is renewable, the refund of the invoiced entry-capacity charges is applied proportionally, based on the share of renewable gas in the total injected volume. For example, if the tariff invoicing amounts to €10,000 and 60 % of the injected gas is renewable and the remainder fossil, €6,000 of the tariff revenue will be refunded.

Refund: Carried out automatically in February of the year following the gas-injection year, based on the capacity data and GOs. The measured quantities and the number of GOs must match. If the data differ, the refund is calculated according to the lower amount.

2. A direct physical connection and a container injection solution
3. Container injection solution

These cases require reporting of certificates to receive the discount.

Requirement: Information on GOs and sustainability certificates must be delivered to Gasgrid, itemized monthly. The data must be submitted twice a year: H1 data by 31 August and H2 data by 31 January to customerservice@gasgrid.fi

Discount: 100%, granted based on metered injection, but conditional on the number of certificates supplied. **PoSs and GOs must be clearly linked to each other so that the renewable gas batch in question can be verified as injected into the network, and to ensure that no double counting or double claiming occurs.**

Refund: The refundable amount is determined monthly but refunded annually after the calendar year, taking capacity bookings into account. Refund is made in February of the year following gas injection, based on measurement data and certificate data. Measurement data and certificates must correspond; if they differ, the refund is based on the lower amount.

LOW-CARBON GAS

GOs are not issued for low-carbon gas. In all other respects, the procedures for renewable gas injection cases apply.

The discount is 75% for volumes for which sustainability certificates relating to injection batches have been provided to Gasgrid. The amount of gas in the certificates must correspond to the injected gas volume.

SUMMARY

Table 1 below presents a summary of the requirements and necessary documentation for injection cases 2 and 3.

Table 1. Summary

	Requirement Monthly allocation		Discount	Refund
Renewable	<ul style="list-style-type: none"> ● Month ● Production plant ● Entry point and *gas injection certificate ● Capacity bookings ● Shipper information ● Energy MWh (HHV) ● GO certificate number (start–end) ● Sustainability certificate ID number and the sustainability certificate itself 	Information must be submitted to customerservice@gasgrid.fi twice a year: H1 by 31 August H2 by 31 January	100 %, to the extent that the GOs and PoSs submitted to Gasgrid matches the monthly injected volumes considering capacity bookings.	The discount is granted based on the lower amount (measurement vs. certificates). A final reconciliation is carried out in January–February, and the refund is paid by 28 February.
Low Carbon	<ul style="list-style-type: none"> ● Month ● Production plant ● Entry point ● Capacity bookings ● Shipper information ● Energy MWh (HHV) ● Sustainability certificate ID number and the sustainability certificate itself 		75 %, to the extent that PoS has been submitted to Gasgrid.	

**Gas injection certificate* means a document confirming the physical injection of gas into the gas network, regardless of whether the gas is delivered in LNG form and discharged into storage or injected directly into the network from a transport container.