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CUSTOMER GUIDANCE – VERIFICATION OF A PRODUCTION DEVICE

This guidance is intended for account holders of the gas and hydrogen guarantee of origin (GO) registry and for production device operators. It describes the key principles and responsibilities related to production device verification and Gasgrid's role in providing guidance.

Verification of a production device

Before GOs can be issued for energy produced by a production device, an assessment body approved by the Finnish Energy Authority must verify the production method of the production device and the energy sources it uses. The assessment body issues a verification certificate. The list of approved assessment bodies is available on the [Finnish Energy Authority's website](#) (in Finnish and Swedish).

Verification must be carried out in accordance with the Act on Guarantees of Origin for Energy, the Government Decree on Guarantees of Origin for Energy and the Finnish Energy Authority's verification instructions. Chapters 1–3 of the verification instructions, containing the general requirements applicable to all verifiers, and Chapter 7 on guarantees of origin apply to the verification.

Responsibilities of the production device operator

The production device operator must provide the assessment body with all necessary, accurate and sufficient information for the verification and enable the verification to be carried out properly.

The production device operator is also responsible for ensuring that a valid verification certificate, together with the required annexes, is submitted to Gasgrid.

Responsibilities of the assessment body

The assessment body is responsible for carrying out the verification properly and for ensuring that the verification certificate it issues complies with all applicable requirements in its entirety.

Before issuing a verification certificate, the assessment body must ensure that it has sufficient information to reach its verification conclusions and that the verification certificate and its annexes contain the information required by legislation and by the Finnish Energy Authority's verification instructions.

Carrying out the verification and quality assurance of the verification certificate are the responsibility of the assessment body.

Gasgrid's role

Gasgrid is the registrar of the registry of GOs for gas and hydrogen. Gasgrid provides guidance to account holders and production device operators on matters within its remit, such as:

- registration of production devices;
- documents and information to be submitted to Gasgrid;
- procedures of the GO registry; and
- terms and instructions applied by Gasgrid to the use of the registry.

When reviewing a verification certificate, Gasgrid may point out deficiencies identified during its review.

Gasgrid does not, however, carry out the verification, assess the sufficiency of verification evidence on behalf of the assessment body or advise how verification of an individual production device should be implemented technically. Gasgrid is also not responsible for quality assurance of the assessment body's verification work or verification certificate.

Based on the submitted verification certificate and its annexes, Gasgrid must be able to determine unambiguously that the certificate contains the information required for registration in the GO registry concerning the production device and the determination of the amount of energy eligible for GOs.

What to include in the verification certificate

The verification certificate or its annexes must clearly state at least the following:

- **Basic details of the production device:** name, location, commissioning date, capacity (kW) and the operator's contact details.
- **Production:** production method (technology) and the energy sources used, including their energy source codes and, where applicable, the method used to determine and meter their shares of production; if, for example, the parent code 'F01000000 Renewable' is used, this must also be stated in the certificate. The technology and energy source codes are available on the [Gasgrid website](https://www.gasgrid.fi).
- **Multi-fuel unit:** the method used to determine the shares of production by fuel and the method used to meter fuel flows.
- **Metering:** the method for metering the energy produced, metering points and metering arrangement, as well as the meters used to determine the amount of energy.
- **Own consumption:** how own consumption that is not eligible for GOs is determined.
- **Reliability of metering data:** how the reliability of metering data is ensured and how the data is reported.
- **Calculated components:** if the metering method includes calculated components, the sources of the constants and formulas used and an assessment of their impact on the reliability of determining the amount of energy.
- **Grid connection:** information on the grid connection and on how the energy produced is metered; if the production device is not connected to a grid, this must also be stated.
- **Verification details:** the date of the verification certificate and the verifier who carried out the verification.
- **Annexes:** a metering arrangement diagram must be attached to the verification certificate; all annexes must be listed in the verification certificate itself.

Note: The list is not exhaustive. The assessment body is responsible for ensuring that the verification and the verification certificate, including its annexes, comply with all applicable requirements.

Points to consider when carrying out verification

The information on metering must form a clear and consistent whole. The verification documentation must show what is measured, where it is measured, which metering arrangement is used to determine the amount of energy, how own consumption is taken into account, how the reliability of metering data is ensured and how the data is reported. A list of meters alone is therefore not sufficient.

As a rule, the amount of energy eligible for GOs must be determined on the basis of metering. If the metering method uses the production device's own meters or calculated components, the assessment body must assess their impact on the reliability and overall uncertainty of determining the amount of energy. For calculated components, the formulas, constants and their sources must be described.

Verification generally includes a site visit. The site visit and the matters reviewed during it are documented in the assessment body's verification report. If verification is exceptionally carried out without a site visit, the procedure must be based on the Finnish Energy Authority's verification instructions, and the assessment body is responsible for contacting the Finnish Energy Authority.

The verification documentation submitted to Gasgrid should indicate the date of the site visit or state if the verification has been carried out without a site visit on justified grounds. This information is requested for Gasgrid's registry processing and is not mandatory content of the verification certificate under the legislation.

It must also be ensured that the information on which the verification is based reflects the current status of the production device. Following changes, the information and, where necessary, the verification certificate must be updated.

Keeping information up to date and managing changes

Verification is valid for five years from the issue of the verification certificate, unless, for a specific reason, it has been carried out for a shorter fixed period.

The production device operator must ensure that the information on the production device and verification reported to Gasgrid remains up to date. If a change in the production method, energy sources, metering arrangements, metering points, determination of own consumption, production boundaries or other arrangements affects or may affect the issue of GOs, the impact of the change on verification must be assessed and the information must be updated. Where necessary, an updated verification certificate must be submitted to Gasgrid.

Changes must be verifiable at the time of verification. To avoid an interruption in the issue of GOs, verification should be carried out when the changes take effect. The account holder is responsible for ensuring that the information in the registry is accurate and up to date.

If the verification certificate is deficient

If a verification certificate submitted to Gasgrid does not meet the applicable requirements, Gasgrid will request a corrected or supplemented verification certificate issued by the assessment body.

Deficiencies identified by Gasgrid during its review do not constitute an exhaustive checklist for the assessment body and do not mean that Gasgrid has found the other parts of the verification certificate to be compliant.

Before issuing a corrected or supplemented verification certificate, the assessment body must re-check that the verification and the verification certificate *in their entirety comply* with the applicable requirements. Corrected or supplemented verification certificates should be identified by a version number.

Where to obtain guidance

Gasgrid provides guidance on the use of the GO registry, registration of production devices and the information and documents to be submitted to Gasgrid. Gasgrid may also explain what information the verification certificate must contain and the basis for the requirement.

The assessment body is responsible for verification of the production device and determines how the verification is carried out for the individual production device, what information and evidence the verification requires and how, for example, metering, production boundaries, own consumption and calculation methods are taken into account in the verification. The assessment body is also responsible for ensuring that the verification certificate complies with the applicable requirements in its entirety.

The Finnish Energy Authority may be contacted where a question requires interpretation of a decision of the Finnish Energy Authority or other authority guidance and cannot be resolved on the basis of the applicable rules and guidance. The assessment body nevertheless remains independently responsible for its verification decision.

Gasgrid does not decide the verification method for an individual production device on behalf of the assessment body and does not give prior approval to a planned metering, calculation or other verification solution.

Key legislation and guidance

- [Act on Guarantees of Origin for Energy \(1050/2021\)](#)
- [Government Decree on Guarantees of Origin for Energy \(1081/2021\)](#)
- [Finnish Energy Authority's verification instructions](#) (in Finnish)

Further information

Gasgrid customerservice@gasgrid.fi

Finnish Energy Authority go@energiavirasto.fi

ANNUAL INSPECTION GUIDANCE FOR PRODUCTION DEVICES – EECS GOs



Under the Domain Protocol and the EECS¹ Rules, a production device **must be inspected annually** in order to be eligible for EECS GOs. The inspection documentation must be submitted to Gasgrid at customerservice@gasgrid.fi each year between 1 January and 30 April, starting in the year following the year in which the issue of EECS GOs began.

The annual inspection of a production device **must not be confused** with verification under the Act on Guarantees of Origin for Energy, which is valid for five (5) years. No separate annual inspection is required in a year when the statutory verification is carried out.

Verification under the Act on Guarantees of Origin for Energy also applies to EECS GOs and is carried out in accordance with the Act on Guarantees of Origin for Energy, the Government Decree on Guarantees of Origin for Energy and the Finnish Energy Authority's verification instructions. There are no separate EECS requirements for the verification.

For further information on EECS annual inspections, contact Gasgrid at customerservice@gasgrid.fi. The current annual inspection guidance is available on the [Gasgrid website](https://www.gasgrid.fi).

¹ [European Energy Certificate System developed by the Association of Issuing Bodies \(AIB\).](#)