





EECS

DOMAIN PROTOCOL

FOR

GASGRID FINLAND OY – FINLAND GAS AND HYDROGEN

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TABLE OF CONTENTS

Α	Intr	oduction	5 -
В	Ger	neral	6 -
	B.1	Scope	6 -
	B.2	Status and Interpretation	7 -
	B.3	Roles and Responsibilities	7 -
	B.4	Summary: Issuance scope	9 -
С	Ove	rview of National Legal and Regulatory Framework	9 -
	C.1	Energy Market context for gas and hydrogen	9 -
	C.2	The EECS Framework	10 -
	C.3	National Energy Source Disclosure	11 -
	C.4	National Public Support Schemes	12 -
	C.5	EECS Product Rules	12 -
	C.6	Non-EECS GOs in the Domain	12 -
	C.7	Local Deviation from the EECS Rules	13 -
D	Reg	istration	13 -
	D.1	Registration of an Account holder	13 -
	D.2	Resignation of an Account Holder	15 -
	D.3	Registration of a Production Device	15 -
	D.4	De-Registration of a Production Device	19 -
	D.5	Maintenance of Production Device Registration Data	19 -
	D.6	Audit of Registered Production Devices	20 -
	D.7	Registration Error/Exception Handling	21 -
Ε	EEC	S (OR NATIONAL) go System Administration	22 -
	E.1	Issuing EECS (or national) GOs	22 -
	E.2	Processes	23 -
	E.3	Measurement	24 -
	E.4	Energy Storage	25 -
	E.5	National GOs (non-EECS GOs): Energy Carrier Conversion	26 -
	E.6	Combustion Fuel (e.g., Biomass) Input and Production Devices with multiple energy inputs	26 -
	E.7	Format	26 -
	E.8	Transferring EECS (and national) GOs	27 -
	E.9	Administration of Malfunctions, Corrections and Errors	28 -
	E.10	End of Life of EECS (or national) GOs – Cancellation	28 -
	E.11	End of Life of EECS (or national) GOs – Expiry	30 -







E.12	End of Life of EECS (or national) GOs – Withdrawal	- 30 -
E.13	Publicity and confidentiality	- 31 -
Issu	er's Agents	31 -
F.1	Production Auditor	- 31 -
F.2	Production Registrar	- 31 -
F.3	Measurement Body(/ies)	- 31 -
Activ	vity Reporting	32 -
G.1	Public Reports	- 32 -
G.2	Record Retention	- 32 -
G.3	Orderly Market Reporting	- 32 -
Asso	ociation of Issuing Bodies	32 -
H.1	Membership	- 32 -
H.2	Complaints to the AIB	- 33 -
Chai	nge Control	33 -
I.1	Complaints to Gasgrid Finland	- 33 -
1.2	Disputes	- 34 -
1.3	Change Requests	- 35 -
nnex 1	Contacts List	36 -
nnex 2	Account Application/Amendment Form	38 -
nnex 3	Device Registration Form (screenshots from registry)	39 -
nnex 4	Production/Consumption Declaration (screenshots from registry)	41 -
nnex 5	Cancellation Statement template (screenshots from registry)	42 -
	E.13	E.13 Publicity and confidentiality







A INTRODUCTION

This Domain Protocol describes how the EECS (the European Energy Certificate System) Standard has been implemented in the Finland Domain for a gas and hydrogen guarantees of origin (hereinafter GO) and it indicates where that system deviates from the EECS standard. The EECS framework including the Domain Protocol aims to ensure robustness and transparency for all parties involved.

Gasgrid Finland is authorised to issue the national GOs outside of the EECS framework and EECS GOs relating to the EECS framework. A production device can only be registered to one GO standard (national or EECS) at a time. The terms and the handling of processes are equivalent for national GOs (non-EECS GOs) and for EECS GOs, unless otherwise stated in this Domain Protocol and the Standard Terms and Conditions (hereinafter STC). National GOs (non-EECS certificates) may not be transferred over the AIB hub.

A Domain Protocol promotes quality and clarity, as it:

- explains local rules;
- provides clear information to all stakeholders (consumers, market parties, other members, government, the EU Commission etc.);
- facilitates assessment of compliance and permissible deviation from the EECS Rules;
- facilitates audit; and
- translates local rules into a single format and language, supporting each of the above.

In accordance with the Act on Guarantees of Origin for Energy (1050/2021), a gas or hydrogen supplier that sells renewable gas or hydrogen to a user must certify the origin of the gas or hydrogen that it sells. The quantity or share of renewable gas of the gas sold shall be certified, no later than on the date determined by the Finnish Energy Authority, with a corresponding number of cancelled GOs. A gas/hydrogen producer that in its business activities other than those relating to gas/hydrogen sales discloses to its customers information about the origin of gas/hydrogen that it uses shall certify the origin of renewable gas/hydrogen. A gas/hydrogen user that in its marketing discloses that it uses renewable gas/hydrogen shall certify the origin of the gas/hydrogen or shall be otherwise able to demonstrate that it has used certified gas/hydrogen. The amount of renewable gas/hydrogen, or the share of sold gas/hydrogen, is verified with a corresponding amount of cancelled GOs.

Important contact information is provided in Annex 1.







B GENERAL

B.1 Scope

This section demonstrates compliance with the following EECS Rules:

A11.1.1 C3.1.1 E6.2.1a E6.3.1 E6.3.2 N2.1.1 O2.1.1
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- B.1.1 This Domain Protocol sets out the procedures, rights and obligations, which apply to the Domain of Finland and relate to the EECS Gas Scheme as defined in the EECS Rules.
- B.1.2 Production device qualification for this Domain will be determined such that, the production device is effectively located in Finland, excluding Åland Islands.
- B.1.3 Gasgrid Finland Oy (hereinafter Gasgrid Finland) is authorised to issue EECS Certificates relating to the following EECS Product(s):
 - EECS Guarantee of Origin (EECS GO)
- B.1.4 Gasgrid Finland is authorised to issue EECS GOs relating to the following EECS Product Type(s):
 - Source
- B.1.5 Gasgrid Finland is authorised to issue EECS GOs (and national GOs)srelating to the following energy carriers: gas and hydrogen and the following energy sources: *renewable* energy sources. GOs are issued for the following types¹ of renewable gas: Unspecified gas (unspecified; applicable e.g., to biogas that has not been upgraded into biomethane), hydrocarbon gas (methane) and hydrogen.
- B.1.6 Gasgrid Finland is authorised to issue the following national GOs outside of the EECS Framework:
 - National GOs: The Finnish national GO standard meets the requirements defined by the Act on Guarantees of Origin for Energy (1050/2021). The following parts of this Domain Protocol do not apply for these non-EECS certificates: C.7.1, C.7.2, D.5.2, D6.4, E2.3, E7, E8.3, E.8.4, E.8.8, E.8.9, E.8.11, H1 and H2. Otherwise, the terms and the handling of processes are equivalent for national GOs (non-EECS GOs) and for EECS GOs.
 - The energy carrier conversion process does not comply with the EECS Rules: According to the Finnish legislation, the source of energy can be reported as "unspecified renewable energy" without further classification, regardless of the source of renewable energy stated in the GOs cancelled for the conversion. As a result, the GOs issued will state "unspecified renewable energy" as the energy source. This Domain Protocol will be updated when the conversion is specified in the European Standard pr EN16325 and/or in other legislation and/or when the conversion instruction is updated by the Finnish Energy Authority. The national conversion is proceed as set out in section E.5.

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¹ In accordance with EECS Rules Fact Sheet 22 Type of Gas







- B.1.7 A production device can only be registered to one GO standard (national or EECS) at a time.
- B.1.8 The production devices that are already registered in the gas and hydrogen GO registry at the time of entry into force of this Domain Protocol and STC, shall make a new² registration within three (3) months after entry into force of this Domain Protocol.

B.2 Status and Interpretation

This section demonstrates compliance with the following EECS Rules:

E6.2.1d	E6.2.4	E6.3.1	E6.3.4

- B.2.1 This document refers to EECS Rules 8 version 1.7 https://www.aib-net.org/eecs. It is based on the Domain Protocol template release from January 2023.
- B.2.2 The EECS Rules are subsidiary and supplementary to national legislation.
- B.2.3 The EECS Rules and its subsidiary documents are implemented in Finland in the manner described in this Domain Protocol. Any deviations from the provisions of the EECS Rules that may have material effect are set out in section C.7 of this document.
- B.2.4 The terms used in this Domain Protocol shall have the meanings ascribed to them in the EECS Rules except as stated in section C.7 of this document. Unless otherwise specified, the definitions in the STC also apply to this Domain Protocol.
- B.2.5 This Domain Protocol is made contractually binding between any account holder and Gasgrid Finland by agreement in the form of the STC.
- B.2.6 In the event of a dispute, the approved English versions of this Domain Protocol and STC, concerning to the EECS GOs, will take precedence over a local language version. For national GOs, the primary languages are Finnish and, on request, Swedish.

B.3 Roles and Responsibilities

A11.1.1 C3.1.1 E4.2.2 E6.2.1	: H
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- B.3.1 The authorised Issuing Body for gas/hydrogen EECS GOs and national GOs in Finland is Gasgrid Finland. Its role is to administer the EECS (and national) registration database (hereinafter registry) and its interface with the EECS transfer system.
- B.3.2 The Competent Authority for EECS (and national) gas/hydrogen GOs in Finland is Gasgrid Finland. Its role is defined by legislation to be responsible for the operation of the gas/hydrogen GO system in Finland.
- B.3.3 As a transmission system operator with system responsibility, Gasgrid Finland is responsible for the establishment, operation, and maintenance of gas measurement systems of entry and exit points, transmission network end user metering sites and connection points ('citygate')

² In accordance with the pricing method, the initial registration is free of charge for production facilities that are already registered. For national GOs, Gasgrid Finland conducts a data verification process and a STC will be signed. For those related to the EECS standard, Gasgrid Finland verifies that the production facility meets the EECS requirements (audit has been done) and a STC will be signed.







connected to the transmission network or ensure that these are organised. At the physical entry and exit points, biogas entry points, transmission network end user metering sites and each connection point ('citygate') connected to the transmission network, the TSO shall be responsible for or ensure that metering and determinations meet the requirements of the gas measurement recommendations of the TSO. More information of the gas market rules and recommendations is available on the webpage of Gasgrid Finland https://gasgrid.fi/en/gas-market/legislation-regulation-and-recommendations/. Detailed requirements and recommendations are defined in the national and EU legislation³.

In accordance with the Act on Guarantees of Origin for Energy (1050/2021), in the case of distribution network and offgrid production, the measuring method of the production volume as well as the accuracy requirements must have been verified by a Production Auditor approved by the Finnish Energy Authority. The national metering practices is set out in section E.3.

- B.3.4 Contact details for the principal roles and Issuing Body agents are given in Annex 1.
- B.3.5 The registry operated by Gasgrid Finland can be accessed via the website https://grex.grexel.com/en/public/home.
- B.3.6 The following EECS Product can be issued under this Domain Protocol:

EECS Product	Label
EECS GO	-

- B.3.7 Other known Issuing Bodies in this Domain are Finextra Oy and the Finnish Energy Authority. They are responsible for certificate issuing for electricity (Finextra Oy) and for heating and cooling (the Finnish Energy Authority). All three Issuing Bodies co-operate and communicate e.g., to prevent double issuing. Interaction with Issuing Bodies in this Domain is coordinated by the authorised supervising body, The Finnish Energy Authority. In accordance with the Finnish Government Proposal for The Act on Guarantees of Origin for Energy (1050/2021), the implementation and supervising of the law require cooperation and exchange of information.
- B.3.8 The tariff for GOs is published on Gasgrid Finland's website https://gasgrid.fi/en/our-services/guarantees-of-origin/
- B.3.9 Gasgrid Finland acts as the data controller for personal data contained in the registry. Details associated with the processing of personal data are described in Gasgrid Finland's registry description, which is available on Gasgrid Finland's website.

³ The Measuring Instruments Act (707/2011), the Act amending the Measuring Instruments Act (1138/2016), the Government decree on the measuring instruments (1432/2016), the EU directive 2014/32/EU







B.4 Summary: Issuance scope

B.4.1 In summary, Gasgrid Finland has been authorised to issue the following types of energy certificates:

Issuing Body is	ssues certificates for Gas			
	Energy Source	Hydrocarbon gas (methane)	Hydrogen	Unspecified
EECS GO	Renewable	X	X	X
National GO (non-EECS*)	Renewable Unspecified renewable energy after renewable energy carrier conversion	X	X	X

^(*) Non-EECS certificates may not be transferred over the AIB hub.

C OVERVIEW OF NATIONAL LEGAL AND REGULATORY FRAMEWORK

C.1 Energy Market context for gas and hydrogen

- C.1.1 The derogation from compliance with requirements under EU legislation granted for Finland by the European Union ended when the Balticconnector interconnector pipeline between Finland and Estonia was completed, and the Finnish gas market was opened to competition on 1 January 2020. From the beginning of 2020 Finland started applying EU gas market legislation in full and the gas transmission network company Gasgrid Finland owned by the State of Finland has been responsible for gas transmission in Finland. Following the opening of the gas market, third parties have equal and non-discriminatory opportunities for network access in the natural gas transmission and distribution networks. An entry-exit system in accordance with EU gas market legislation is applied in Finland. Trade in gas energy and transmission capacity takes place in the wholesale market. The transmission system operator (TSO) Gasgrid Finland is responsible for selling transmission capacity in the system and the shippers and traders are responsible for selling gas energy. The wholesale market participants comprise the shippers, traders and transmission network end users. The retail market participants comprise retailers, retailers with delivery obligation and distribution network end users. Biogas injecting parties and LNG processing facility operators may operate in the wholesale or retail market depending on whether the facility is connected to the transmission or distribution network.
- C.1.2 In Finland, the biogas is produced e.g., at the wastewater treatment plants, co-treatment plants, and biogas plants on farms as well. In addition, the biogas is collected from landfills.







- C.1.3 Gasgrid Finland has identified hydrogen as a key influencing energy carrier affecting the future energy system. Gasgrid Finland promotes the development of the national hydrogen network and international infrastructure cooperation. Gasgrid Finland participates in development projects in the Baltic Sea region as part of the European Hydrogen Backbone initiative. Through development projects, the hydrogen network in the Baltic Sea region can grow to 5,000 kilometers already by 2030. With the help of the projects and the renewable energy resources of the Baltic Sea region, up to 90 percent of the EU's clean hydrogen production targets can be achieved. In addition, Gasgrid Finland has launched hydrogen infrastructure development projects in the Bothnian Bay region: Nordic Hydrogen Route is an initiative between Gasgrid Finland and Nordion Energi to accelerate the creation of a hydrogen economy by building up a cross-border hydrogen infrastructure in Bothnian Bay region and an open hydrogen market by 2030. Baltic Sea Hydrogen Collector development project explores the possibilities of building a offshore hydrogen pipeline connecting Finland, Sweden and Germany to enable the production and storage of clean and sustainable hydrogen. The goal of the Nordic-Baltic Hydrogen Corridor project is to develop hydrogen infrastructure from Finland through Estonia, Latvia, Lithuania and Poland to Germany by 2030. Gasgrid Finland Oy, Kemira Oyj and Ovako Imatra Oy Ab have entered into a cooperation agreement to assess the feasibility of a demonstration project for the pipeline transmission of hydrogen and launched the feasibility study phase of the project. The parties are also currently negotiating on the further development of the project.
- C.1.4 More information is available on the webpage of Gasgrid Finland https://gasgrid.fi/en/ and the webpage of Finnish Energy Authority https://energiavirasto.fi/en/frontpage. Energy Authority regulates, promotes, and supervises the operation of the electricity and gas markets, emission reductions, energy efficiency and the use of renewable energy.

C.2 The EECS Framework

D3.1.2 E6.2.1b E6.2.1d N8 O.10)
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- C.2.1 For this Domain, the relevant local enabling legislation is as follows:
 - Laki energian alkuperätakuista 1050/2021 (official in Finnish and Swedish) https://finlex.fi/fi/laki/alkup/2021/20211050
 - The Act on Guarantees of Origin for Energy 1050/2021 (unofficial translation in English) https://www.finlex.fi/en/laki/kaannokset/2021/en20211050
 - Valtioneuvoston asetus energian alkuperätakuista 1081/2021 (official in Finnish and Swedish) https://www.finlex.fi/fi/laki/alkup/2021/20211081
 - The Governmental Decree on Guarantees of Origin for Energy 1081/2021 (unofficial translation in English) https://www.finlex.fi/en/laki/kaan-nokset/2021/en20211081
 - Directives (EU) 2018/2001 and 2012/27/EU. According to directive (EU) 2018/2001 and the Act on Guarantees of Origin for Energy 1050/2021, GOs will be issued







following the standard CEN EN 16325. GOs issued following the EECS rules fulfil this standard.

- In accordance with the Act on Guarantees of Origin for Energy 1050/2021 sections 16 and 18, Finland recognizes RES gas and hydrogen GOs from other EU and EEA countries unless it has severe doubts about the accuracy, reliability or veracity of the GO. GOs must have been issued in accordance with the renewable energy directive.
- C.2.2 Acting as the Issuing Body is a public administrative task that has been assigned to a party other than a public authority in legislation. When carrying out a public administrative task, also general administration legislation, such as the Administrative Procedure Act, the Language Act, the Act on the Openness of Government, the Data Protection Act, and the Act on Electronic Services and Communication in the Public Sector, must be complied with.
- C.2.3 Gasgrid Finland has been properly appointed as an authorised Issuing Body for RES gas and hydrogen under <u>The Act on Guarantees of Origin for Energy 1050/2021</u> section 21.

C.3 National Energy Source Disclosure

E3.3.14 C7.1.1 C7.2.2	E3.3.14	(/ 1 1	C7.2.2	
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- C.3.1 For this Domain, the authorised body for supervision of disclosure of the origin of energy towards consumers is the Finnish Energy Authority https://energiavirasto.fi/en/frontpage. This body is responsible for supervision of disclosure of the origin of the following energy carriers: renewable gas and hydrogen and the following types of renewable gas: Unspecified gas (unspecified; applicable e.g., to biogas that has not been upgraded into biomethane), hydrocarbon gas (methane) and hydrogen.
- C.3.2 The legislation and regulation for disclosure are available on https://gasgrid.fi/en/our-ser-vices/guarantees-of-origin. In briefly, the methodology and process for disclosure are: According to the Act on Guarantees of Origin for Energy, sellers, producers and users of gas and hydrogen must verify the origin of the gas and hydrogen they sell or use in situations where gas and hydrogen are marketed and sold as renewable in origin. According to the Finnish Energy Authority regulations the obligation to verify the origin of gas and hydrogen informed as having been produced from renewable energy sources must be met by cancelling GOs allocated to the previous calendar year with the registrar by 31 March the following year.
- C.3.3 Cancellation for usage in another Domain (i.e., Ex-Domain Cancellation) are allowed unless the domains are connected to AIB Hub. This shall be agreed between the Issuing Bodies in an Ex-Domain Cancellation Agreement, where there is such an Issuing Body appointed by applicable law for the relevant energy carrier in the relevant Domain. The details of the Ex-Domain cancellations are set out within section E.10.7 and E.10.8 of this document.







C.4 National Public Support Schemes

- C.4.1 Public supports for investment in the production devices that produce RES-gas/hydrogen in Finland are:
 - Energy aid for investments and energy audits based on the Government Decree on General Terms of Granting Energy Support in years 2023-2027 (262/2023)
 - Energy investment aid under Finland's Recovery and Resilience Plan (calls in 2022-2023, based on the Government Decree on Aid for Energy Investments under the Finland's Recovery and Resilience Plan in 2022–2026 (1112/2021)
- C.4.2 According to the current knowledge there are no new production support systems related to the production of renewable energy planned in Finland.
- C.4.3 No relation exists between renewable energy support and disclosure. The legislation does not set any restrictions for issuing and cancelling GOs from supported production. National (public) support for gas production can be given by investment support or other support and needs to be mentioned on the GO if the energy generating installation has, after 29 June 2021, received investment support or benefited from another national support scheme, and the type of support scheme. (The Governmental Decree on Guarantees of Origin for Energy 1081/2021 https://www.finlex.fi/en/laki/kaannokset/2021/en20211081 sections 3 and 4)
- C.4.4 EECS Rules sets out the way in which EECS Certificates should record in the registry.

C.5 EECS Product Rules

This section demonstrates compliance with the following EECS Rules:

E6.2.1f	E6.2.1g		
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C.5.1 The EECS Product Rules as applied in Finland are set out within sections D Registration and E EECS (or national) GO System Administration of this document.

C.6 Non-EECS GOs in the Domain

- C.6.1 Gasgrid Finland is authorised to issue the national GOs outside of the EECS Framework: The Finnish national GO standard meets the requirements defined by the Act on Guarantees of Origin for Energy (1050/2021). Section B.1.6 defines the parts of this Domain Protocol that are not applicable to the national GOs. Otherwise, the terms and the handling of processes are equivalent for national GOs (non-EECS GOs) and for EECS GOs.
- C.6.2 The production device must be registered to one of the following GO standards: National or EECS. At a time, only one standard can be registered and only one can be issued GOs.
- C.6.3 When energy is converted from one form to another, the resulting energy carrier may be issued a GO, if the origin of the energy used in its production has been verified by cancelling GOs or the origin can be reliably verified by other means. In the conversions, the source of energy can be reported as "unspecified renewable energy" without further classification, regardless of the source of renewable energy stated in the GOs cancelled for the conversion. As a result, the GOs issued will state "unspecified renewable energy" as the energy source.







The energy carrier conversion process does not comply with the EECS Rules, so the issued GOs are national.

C.7 Local Deviation from the EECS Rules

This section identifies those areas where there are minor differences from the EECS Rules without impacting the integrity of EECS GOs.

- C.7.1 EECS Rules C3.4.1 (Domain Protocol E.1.4 Frequency of Issue): Basically, issuing takes place during the calendar month following the production month as set out in section E.1.4. As regards production notified later or retrospectively, issue of EECS (or national) GOs is correspondingly moved to the next month. EECS (or national) GOs are always issued for each production month considering the validity period as set out in section E.11. This deviation is required to allow flexibility.
- C.7.2 EECS Rules O6.4.2 and O6.4.3 (Domain Protocol E.3.7, E.3.8 and E.3.9 Net Gas Production): Issuing of EECS GOs is based on net gas production. As set out in the Finnish Act on Guarantees of Origin for Energy (1050/2021), the Finnish Government Proposal for The Act on Guarantees of Origin for Energy (1050/2021) and the Finnish Energy Authority's decision 7 March 2023, gaseous energy carrier used for the auxiliary energy of the production device is deducted from the measured output. This deviation is kept until the AIB's Gas Scheme Group publishes a subsidiary document on conversion efficiency with default percentages for the use of non-gaseous auxiliaries or develops another approach or this is specified in the European Standard prEN 16325 or in the other legislation. In order for Gas Scheme Group to evaluate the impacts of this deviation, Gasgrid Finland will collect data from the gas producers regarding the non-gaseous auxiliary consumption, from the gas production devices in operation. Regarding biomethane production, data is collected regarding the electricity and heat consumption for raw biogas production and for upgrading to biomethane.

D REGISTRATION

D.1 Registration of an Account holder

This section demonstrates compliance with the following EECS Rules:

G2.2.1		

- D.1.1 All documents and information can be found in the same form on the website of Gasgrid Finland in English, Finnish and Swedish https://gasgrid.fi/en/our-services/guarantees-of-origin/
- D.1.2 The EECS (and national) GO system are open to the producers of gas and hydrogen from renewable energy sources, gas/hydrogen users and market participants, regardless of whether the gas/hydrogen is injected into the transmission or distribution network or produced or used outside the network (so-called offgrid production). Any legal person who is not a member of the Association of Issuing Bodies or such member's affiliate or agent can apply to be an account holder in the registry.

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⁴ Gas that is produced outside of the Finnish natural gas system defined in the Natural Gas Market Act (587/2017).







- D.1.3 The application is made by filling in and signing a STC between Gasgrid Finland and the account holder. The contract also contains the relevant terms and conditions.
- D.1.4 The contract (STC) must contain
 - contact form, incl. The organisation's (contractual party's) name and address, invoicing information and the organisation's Business ID or another company identification
 - a trade register extract or a similar official document verifying that the organisation is factually operating and has been incorporated in accordance with the laws of the company's home country
 - the names of persons authorised to sign; the service agreement must be signed by such authorised person(s), a power of attorney if necessary
 - the information on which standard(s)⁵ the account holder registers.

A power of attorney is also needed when the company authorizes a person to act as an account holder and contact person in the registry. A STC as well as other documents can be found on the website of Gasgrid Finland https://gasgrid.fi/en/our-services/guarantees-of-origin/

- D.1.5 Based on the STC with appendixes, Gasgrid Finland makes a judgement on whether the application is approved or rejected and whether further information needs to be requested. Bases for rejection can be missing or inadequately completed mandatory documents, Gasgrid Finland's justified reason to suspect the intentions of the applicant, or an authority's recommendation about rejecting the application.
- D.1.6 When an application has been approved, Gasgrid Finland creates an account in the registry for the applicant organisation considering the standard(s) to which the account holder is registered for. At the time of creating an account, instructions for registration are sent to the person authorised in the service agreement. The authorised person is named as the administrator of the account holder. One account holder organisation may have several users that the administrator of the said account holder (the authorised person) can create. The administrator is responsible for managing the account and its user rights and can create new users.
- D.1.7 Gasgrid Finland registers the operators participating in the EECS GO (or national) system without undue delay.
- D.1.8 An account holder must notify Gasgrid Finland in writing without delay of all changes that may cause or have caused information recorded in the registry containing the account holder no longer being accurate. The account holder is responsible for the accuracy and up-to-dateness of the information in the registry.
- D.1.9 If Gasgrid Finland observes errors in the account holder's information, Gasgrid Finland will request the account holder to correct such information without undue delay. If an account holder is not able to correct the information itself for example due to restrictions concerning the registry's user rights, Gasgrid Finland will correct the information. The account holder is notified of such actions.

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⁵ The possible standards are national gas GO, national hydrogen GO, EECS gas GO and EECS hydrogen GO.







D.1.10 Know-Your-Customer checks are carried out by Gasgrid Finland to confirm that the information provided complies with the requirements of the regulations and the information is comprehensive and accurate.

D.2 Resignation of an Account Holder

This section must demonstrate compliance with the following EECS Rules:

None directly		

- D.2.1 An account holder must notify Gasgrid Finland in writing about its intention to close its account. The date when the closure enters into force must be at a minimum be 30 business days from the date when Gasgrid Finland received the notification.
- D.2.2 When an account is closed, the account holder must pay any payments due relating to the EECS (or national) GO system to Gasgrid Finland. Gasgrid Finland is not obligated to refund any payments already made by the account holder.
- D.2.3 Gasgrid Finland makes the changes to the registry and closes the account on the date the request comes into effect or 30 days from the date of receiving the notification, whichever is later.
- D.2.4 All EECS (or national) GOs that are on the registry's account on the date it is locked remain on the account until they expire. The account information will be kept in the registry for six (6) years from the end of the calendar year that the information concerns.

D.3 Registration of a Production Device

C2.1.1 C2.1.2	C2.2.4	D4.1.2	E3.3.10	E3.3.11	N6.2	06.2
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- D.3.1 The owners of the production devices or their duly authorised registrants may register a production device in the registry. If the registrant or its subsidiary owns a maximum of 90 % of the production device, it must attach to the application a power of attorney(s) signed by the other owner(s). A power of attorney is needed from all owners of a production device whose ownership share in the production device exceeds 5 %. If a production device is physically connected to a refining device and the devices have different owners, the devices can be considered one production device. In this case, for a production device to be registered as a combined production device, a power of attorney is required from the party that is not registering the device. The power of attorney may also concern the utilisation of aggregator services: An aggregator has an account on which registered production devices who have acquired services from the aggregator are connected and where GOs are issued.
- D.3.2 When a production device is registered, a verification certificate is delivered to the Gasgrid Finland. In order that a production device can be connected to the registry, its production method must be verified by Production Auditor.
- D.3.3 Gasgrid Finland checks that the production device complies with the requirements of the Finnish regulations concerning EECS Rules. A production device may be registered only if it







meets the criteria for the approval of the EECS (or national) GO system. For a production device to be approved for EECS (or national) GO registration, it must be located in Finland (excluding Åland Islands) and be capable of producing renewable gas/hydrogen.

- D.3.4 A registrant must provide the information set out below when registering a production device on an account it has in the registry. Mandatory information includes the following:
 - Production device: name, address, registrant, start date of production, commissioning date of the production device, production capacity, possible support system⁶ (for example state investment or production support), operator, and owners. If the production plant is formed of several modules that also contain for example a gas refining device, the date when a device or devices producing raw gas started their operations is recorded, as well as what its/their capacity is.
 - The production device's technology code in accordance with the list of technology codes.
 - A list of the raw materials used by the production device (for example, an environmental permit or actual raw material to be used in accordance with Appendix IX of the RED II Directive).
 - Unique identifier. If no such identifier exists, an ID is created for the production device at the time of registration, which also defines the region. The ID uses GSRN (Global Service Relational Number) numbering. The same ID number can be used for small production devices with production below 50 kW, which are in the same place.
 - Is the production device connected to a transmission network or distribution network or is it an offgrid production device outside networks.

Voluntary information:

- Sustainability: The criteria for a sustainability system are as follows: a) The gas/hydrogen fulfill the sustainability criteria outlined in the Renewable Energy Directive (RED II), detailed in Finnish legislation⁷ and instructed by the Finnish Energy Authority, and/or b) There must be a reference to an auditor who has verified compliance with these criteria, and/or c) There must be a reference to a report prepared by the auditor confirming this compliance.
- Possible additional information that may be needed when using the GO for various purposes.
- D.3.5 When registering the production device, the account holder shall register the standard:
 National GO or EECS GO. A production device can only be registered to one GO standard
 (national or EECS) at a time and only if the involved account holder is registered for the same
 standard. An account holder can only handle and transfer certificates of the standards it is
 registered for⁸. When changing standards, re-registration is required.
- D.3.6 The registrant must declare that mandatory information provided is comprehensive and accurate and that the production device fulfils the approval criteria for EECS (or national) GOs. In addition, the template may contain the voluntary information as set out in section

⁶ The Public Support schemes set out in the EECS Rules Fact Sheet 3 "Types of Public Support"

⁷ Such as <u>The Act on Biofuels and Bioliquids (393/2013)</u> (only in Finnish)

⁸ GOs issued for different standards are always located in different accounts in the registry and cannot be mixed.





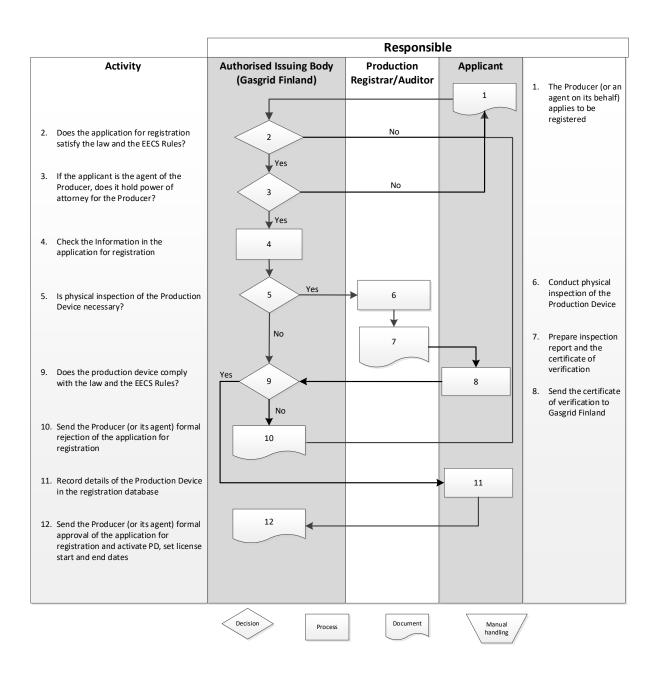


- D.3.4, but that information is not the basis for issuing EECS (or national) GOs. The registrant must declare that voluntary information provided is comprehensive and accurate. The registrant is solely responsible for the correctness of voluntary information. The Finnish Energy Authority is a licensing and regulatory authority regarding sustainability, additional information kestavyyskriteerit@energiavirasto.fi.
- D.3.7 Gasgrid Finland checks the accuracy of mandatory information provided. If the production device meets the requirements prescribed in Finnish legislation and EECS Rules, Gasgrid Finland activates the production device in the registry considering the standard (national or EECS GO), sets the next verification date (as set out in section D.6) for the registry information, and notifies the registrant accordingly.
- D.3.8 If the production device does not meet the requirements, Gasgrid Finland notifies the registrant accordingly and the production device is not activated. The rejection notice must state the reasons for rejection. Gasgrid Finland performs the production device's registration process without undue delay after receiving all the necessary documents and information.
- D.3.9 Issuing of EECS (and national) GOs is based on net gas production defined in section E3.















D.4 De-Registration of a Production Device

This section must demonstrate compliance with the following EECS Rules:

None directly		

- D.4.1 The registrant must notify Gasgrid Finland in writing about its intention to remove the production device from the registry. Gasgrid Finland will implement the removal from the registry without undue delay.
- D.4.2 After removal from the registry, EECS (and national) GOs are no longer issued for the production of the production device. The information about the production device will be kept in the registry for six years from the end of the calendar year that the information concerns.
- D.4.3 Commercial provision of deregistering a production device is set out in the STC.

D.5 Maintenance of Production Device Registration Data

C2.2.	1 0	C2.2.2	C2.2.3	C2.2.5	D5.1.2
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- D.5.1 The registration and verification (a verification certificate) of the production device are valid for a maximum of five years. The registrant must re-apply for registration of the production device and submit a new verification certificate to Gasgrid Finland before the validity expires. The audit is carried out in accordance with the Finnish Energy Authority's instructions https://energiavirasto.fi/documents/11120570/12760579/todentajaohje.pdf (only in Finnish). It is set out in the Finnish Governmental Decree on Guarantees of Origin for Energy 1081/2021 that "a verification conducted by a Production Auditor of the production method of an energy generating installation and the energy sources used by it shall remain valid for five years from the issue of the verification certificate. For a specific reason, verification may also cover a fixed period shorter than five years."
- D.5.2 In addition to the audit at every five years, the Production Auditor nominated by the registrant shall conduct inspections as set out in section D.6.4.
- D.5.3 If an existing production device's capacity changes for some reason, for example as a result of the production device's alteration or extension works, the additional capacity can be registered as a separate element of the production device. If the change requires the renewal of a verification certificate as set out in the Act on Guarantees of Origin for Energy (1050/2021) and the Finnish Governmental Decree on Guarantees of Origin for Energy (1081/2021), the verification must be done before EECS GOs can be issued.
- D.5.4 The registrant of a production device must notify Gasgrid Finland about all changes that have caused or may cause a change in the information concerning the production device recorded in the registry, or the production device in question no longer fulfilling the approval criteria of the EECS (or national) GO system.
- D.5.5 If Gasgrid Finland finds out about changes through any other means than notification by the registrant, it can request additional information to clarify the situation and the changes can







be updated in the registry. If a production device does not fulfil the verification requirements, or if the registration information has changed significantly, EECS (or national) GOs are not issued until corrective measures have been taken. If the production device no longer fulfils the approval criteria, the registration information concerning the production device in question is updated accordingly. The changes enter into effect on the date notified or as soon after receiving the notification as is reasonably possible in practice. If essential deviations from the information recorded in the registry database are observed during an inspection, the Issuing Body reserves the right to require the registrant to re-apply for registration.

- D.5.6 According to the Finnish Act on Guarantees of Origin for Energy (1050/2021) Gasgrid Finland shall notify the supervisory authority, the Finnish Energy Authority, if Gasgrid Finland suspects that an occupier of an energy generating installation or any other user of the registry has violated that act or a provision, order or regulation issued under that act.
- D.5.7 The registrant makes the necessary changes to the production device's information, or if that is not possible for example because of user rights, requests that Gasgrid Finland makes the necessary changes on behalf of the registrant. When Gasgrid Finland receives a notification about changed information, it assesses the impact of the changes to the approval criteria and approves or rejects the information. If the production device no longer fulfils the approval criteria, the registration information concerning the production device in question is updated accordingly. The changes enter into effect on the date notified or as soon after receiving the notification as is reasonably possible in practice.

D.6 Audit of Registered Production Devices

E3.3.7	E3.3.8	D5.1.2	05

- D.6.1 The Production Auditor must verify the production method of an energy production device in the manner required by legislation, as well as the energy sources used by it, and prepare a verification certificate before EECS (or national) GOs can be issued for the energy produced by the production device. Further verification instructions are provided by the Finnish Energy Authority.
- D.6.2 The Finnish Energy Authority approves the Production Auditors and maintains a list of verifiers https://energiavirasto.fi/energian-alkupera ("Hyväksytyt arviointilaitokset"). Webpage is only in Finnish. Further information concerning verification can be obtained from the Finnish Energy Authority go@energiavirasto.fi.
- D.6.3 Registrants must notify of all changes to the information concerning the production device. If the registration information has changed significantly, it is proceed as set out in section D.5.
- D.6.4 In addition to the requirements set out in the Finnish Governmental Decree on Guarantees of Origin for Energy 1081/2021 and in section D5.1 (an audit at every five years), the production devices registered in the registry of Gasgrid Finland are inspected on an annual basis to confirm
 - the input source;







- the accuracy of the measurement devices, where applicable, involved in the calculation
 of the amount of EECS GOs to be issued, should be acceptable in accordance with the existing regulatory framework and applicable standards;
- that the measurement devices are correctly positioned and calibrated to measure the
 gross production output, where applicable, and gaseous consumption by production auxiliaries needed for calculating the amount of EECS GOs to be issued;
- that the production device continues to meet the qualification criteria for the EECS GOs in relation to which it is registered.

Where the content described above is covered, these inspections may be included in an inspection and certification according to Articles 30-31 of RED2 by respective verification schemes and/or so that the production device is inspected according to prevailing legislation and EECS Rules. The inspections may be fulfilled for production devices and their meter equipment, which are audited and/or inspected according to prevailing legislation.

Inspections shall be done by independent third party accepted by Gasgrid Finland. Gasgrid Finland will request the inspector to state that the registration of the production device con-

- D.6.5 If the account holder does not comply with the law or does not obey the orders or instructions of the Finnish Energy Authority (or other supervisory authority), the account holder may be regarded to be in [material] breach of the STC.
- D.6.6 If an inspection identifies material differences from the details recorded on the registry, the registrant must re-apply for registration of the production device, it shall be endeavoured that any undue enrichment by the owner of the production device shall be annulled.

D.7 Registration Error/Exception Handling

This section demonstrates compliance with the following EECS Rules:

tinues to satisfy the criteria mentioned above.

C2.2.2 E4.2.7	
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- D.7.1 If the errors or changes are detected in the registered data regarding the production device, the account holder makes the necessary changes to its information, or if that is not possible for example because of user rights, requests that Gasgrid Finland makes the necessary changes on behalf of the account holder. When Gasgrid Finland receives a notification about changed information, it assesses the impact of the changes to the approval criteria and approves or rejects the information without undue delay.
- D.7.2 Any errors in EECS (or national) GOs resulting from an error in the registered data of a production device will be handled in accordance with section E.9.
- D.7.3 The account holder in the registry is responsible for the correctness of the data of the production device that is provided to the production registrar. Errors need to be notified to Gasgrid Finland immediately after their occurrence and detection.







E EECS (OR NATIONAL) GO SYSTEM ADMINISTRATION

E.1 Issuing EECS (or national) GOs

A2.1.1	A2.1.2	C3.1.1	C3.2.1	C3.3.1
C3.4.2	C3.4.4	E3.3.10	N3.1.1	03.1.1

- E.1.1 EECS (or national) GOs can be issued for renewable gas/hydrogen injected into the distribution or transmission network and offgrid production. The data field "dissemination level", mentioned on the EECS (or national) GOs, indicates the level for which the EECS (or national) GO is issued.
- E.1.2 EECS (or national) GOs are issued on the account on which the production device is registered. As a rule, information concerning a production device that is recorded on an EECS (or national) GO remains unchanged at EECS (or national) GO transfer and can be displayed at the cancellation of the EECS (or national) GO.
- E.1.3 An EECS GO can only be issued for production that fulfils the requirements of the Act on Guarantees of Origin for Energy and EECS Rules (incl. this Domain Protocol and STC), and Gasgrid Finland has received production data concerning the production. National GOs are subject to the Act on Guarantees of Origin for Energy, the terms of this Domain Protocol and STC.
- E.1.4 Issuing takes place during the calendar month following the production month. The production data is delivered as set out in section E.3. The data must be delivered to the registry by the latest on the 15th day following the calendar month of production, or on the following business day if the 15th day is on a weekend or a public holiday. For production notified by the 15th day, EECS (or national) GOs are issued by the last business day of the same month. As regards production notified later or retrospectively, issue of EECS (or national) GOs is correspondingly moved to the next month. EECS (or national) GOs are always issued for each production month considering the validity period as set out in section E.11.
- E.1.5 One EECS (or national) GO corresponds to one megawatt hour (MWh), at the upper calorific value. An EECS (or national) GO is issued for each full megawatt hour. Any kilowatt hours in excess of full megawatt hours are transferred to the following production period. If the production volume during a calendar month is less than one megawatt hour, an EECS (or national) GO is issued for the calendar month during which the production volume reaches the threshold of one megawatt hour. Issuing, transferring, and cancelling an EECS (or national) GO must be executed in such a manner that equivalent GOs for the purpose of disclosure are not issued for the same produced energy. The process of export EECS GOs via the AIB Hub is only a technical adaptation in the database and not an actual issuing process.
- E.1.6 EECS (or national) GO information defined in this document does not change after an EECS (or national) GO has been issued, except for the information that the validity of an EECS (or national) GO has ended, or that an EECS (or national) GO has been cancelled or it has expired.





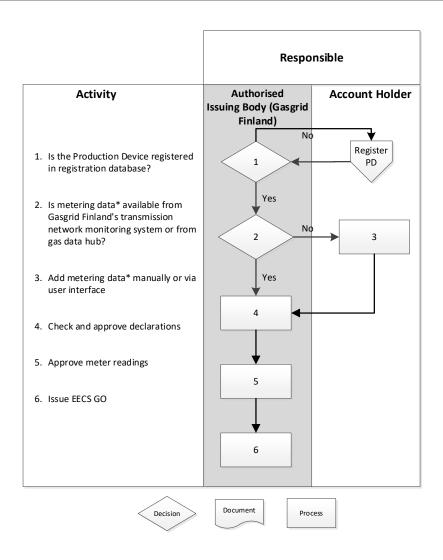


E.1.7 An EECS (or national) GO shall only be issued in respect of output which has not been and is not being otherwise disclosed, including by the issue of any other GO of any variety.

E.2 Processes

This section demonstrates compliance with the following EECS Rules:

A.4	C3.4.1	C3.4.3	C3.5.1	C3.5.2
C3.5.3	C4.1.1	C4.1.3	D7.1.2	E.2
N6.4.	O6.4			



^{*}The measurement as set out in section E.3

E.2.1 The account holder of an account should be treated (as between the account holder and Gasgrid Finland) as the owner of the EECS (or national) GOs. EECS (or national) GOs will be issued to the nominated account for the relevant production device.







- E.2.2 Gasgrid Finland shall ensure that its manual and automated information systems for the issue, holding and transfer of EECS (or national) GOs are able to support audit of all transactions with respect to EECS (or national) GOs.
- E.2.3 Gasgrid Finland shall use in connection with gas EECS Scheme the registry and transfer links approved for the purposes of that EECS Scheme.
- E.2.4 EECS (or national) GOs are issued regularly for all registered production devices. The production period to which GOs relate is one calendar month.
- E.2.5 Issuing of EECS (or national) GOs is possible at the earliest 15th of the month following the month of production.
- E.2.6 One EECS (or national) GO will be issued for each whole one MWh of qualifying energy output of the production device. Any identifiable residual MWh will be carried forward to the next production period.
- E.2.7 Gasgrid Finland checks declarations that they are competent for issuing the EECS (or national) GO.
- E.2.8 Gasgrid Finland issues EECS (or national) GOs and deposits them to the account nominated by the registrant and the account holder is informed of the issue of EECS (or national) GO in the registry.
- E.2.9 EECS (or national) GO data specified by the EECS Rules or legislation, shall not change in any way once an EECS (or national) GO has been properly issued except to indicate that it has expired, cancelled or been withdrawn.

E.3 Measurement

D6.1.2	N6.4.	06.4	

- E.3.1 The Production Auditor verifies measurements as set out in section D6.
- E.3.2 Issuing of EECS (or national) GOs for gas/hydrogen is based on export meter readings and duly certified production and consumption declarations, as applicable.
- E.3.3 Production data for a production device connected to the transmission network: Gasgrid Finland receives the data concerning production connected to a transmission network direct from Gasgrid Finland's transmission network monitoring system. EECS (or national) GOs are issued on the basis of this data taking into account the net gas production as set out in section E.3.7. EECS (or national) GOs are issued for full megawath hours on the basis of the upper calorific value. The data is entered in the registry at the accuracy of three decimals at the highest. The cumulative accrual of decimals is monitored in the registry.
- E.3.4 Production data for a production device connected to the distribution network: Gasgrid Finland receives the data concerning production connected to distribution networks from the information exchange system (gas data hub). Connection to the information exchange system must be arranged before the issue of EECS (or national) GO is started. The distribution system operator creates a network entry point in the information exchange system and delivers the injected volume in m³ as well as the upper calorific value kWh/m³







data in the information exchange system. On the basis of this data, the information exchange system calculates the energy in megawatt hours (MWh) and EECS (or national) GOs are issued on the basis of this data. EECS (or national) GOs are issued for full megawatt hours on the basis of the upper calorific value. The data is entered in the registry at the accuracy of three decimals at the highest. The cumulative accrual of decimals is monitored in the registry.

- E.3.5 The delivery of data concerning hydrogen production injected into the network will be determined later when the hydrogen network solutions are completed. The Domain Protocol will be updated then.
- E.3.6 Offgrid gas produced outside the natural gas system: Gasgrid Finland receives the production data used as the basis for issuing EECS (or national) GOs from the production device (i.e., the account holder involved to the production device) in a separately defined electronic format or via a separate user interface. EECS (or national) GOs are issued for full megawatt hours on the basis of the upper calorific value. The data is entered in the registry at the accuracy of three decimals at the highest. The cumulative accrual of decimals is monitored in the registry. Issuing takes place during the calendar month following the production month as set out in section E.1.4. The measuring method of the production volume as well as the accuracy requirements must have been verified as set out in section D.6.
- E.3.7 Issuing of EECS (or national) GOs is based on net gas production. As set out in the Finnish Act on Guarantees of Origin for Energy (1050/2021), the Finnish Government Proposal for The Act on Guarantees of Origin for Energy (1050/2021) and the Finnish Energy Authority's decision 7 March 2023, gaseous energy carrier used for the auxiliary energy of the production device is deducted from the measured output.
- E.3.8 As a TSO, Gasgrid Finland receives the data concerning the consumption of natural gas connected to the network direct from transmission network monitoring system and from the gas data hub (distribution networks). It is possible to use natural gas in the offgrid production and then the amount of natural gas of the offgrid production device is provided within the EECS (or national) GO issuing request for production period.
- E.3.9 Energy consumed for treatment of waste, including wastewater treatment, needs not to be deducted from the gross energy production as auxiliary consumption where the registrant has demonstrated that such treatment is necessary for the waste processing independent of the production process of the energy carrier.

E.4 Energy Storage

This section demonstrates compliance with the following EECS Rules:

C3.2.4	N6.4.4	N6.4.5	

E.4.1 No GOs are issued for the output of an energy storage device. If necessary, the issuing requirements for energy released from storage will be determined later and Domain Protocol will be updated.







E.5 National GOs (non-EECS GOs): Energy Carrier Conversion

- E.5.1 When energy is converted from one form to another, the resulting energy carrier may be issued a GO, if the origin of the energy used in its production has been verified by cancelling GOs or the origin can be reliably verified by other means. The eligible energy carriers in the conversion are renewable electricity, renewable gas, renewable hydrogen, and renewable heat or cooling. The conversion instruction and examples have been set out by the Finnish Energy Authority and can be found on https://energiavirasto.fi/energian-alkupera (official in Finnish and Swedish) and https://gasgrid.fi/en/our-services/guarantees-of-origin/ (unofficial translation in English).
- E.5.2 Finnish Issuing Bodies (Finextra Oy, The Finnish Energy Authority (supervisor as well) and Gasgrid Finland) meet regularly, at least once every three months. In the meetings they exchange information concerning the registrations of energy production plants that utilise conversion and the cancellations associated with conversions. Issuing Bodies ensure that their registers can output reports on cancellations associated with conversions, including the aims of those cancellations. This is to enable other registers to issue GOs and the Finnish Energy Authority to supervise the activity. The reporting methods and schedule shall be agreed between the Issuing Bodies. The Issuing Bodies publish on their public website the conversion energy production plants in their registry, including the GSRN numbers of the plants.
- E.5.3 The post-conversion national GOs are marked with a conversion tag and cannot be transported over the AIB Hub. Otherwise, these national GOs are subject to the terms of this Domain Protocol.
- E.5.4 This Domain Protocol will be updated when the conversion is specified in the European Standard pr EN16325 and/or in other legislation and/or when the conversion instruction is updated by the Finnish Energy Authority.

E.6 Combustion Fuel (e.g., Biomass) Input and Production Devices with multiple energy inputs

This section demonstrates compliance with the following EECS Rules:

N6.3.2 O6.3.2	
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- E.6.1 The registrant must fill in the consumption declaration in the registry (Annex 4).
- E.6.2 The calculation of combustion fuels is verified by an independent auditor approved by the Finnish Energy Authority.

E.7 Format

This section demonstrates compliance with the following EECS Rules:

C3.5.4	C3.5.5	N6.5.	N6.6	07
08	C3.4.4	E3.3.10	N3.1.1	03.1.1

E.7.1 EECS GOs shall be issued in such format as may be determined by AIB.







E.8 Transferring EECS (and national) GOs

C5 1 1	C5 1 2	C5 1 6	
CJ.1.1	C3.1.3	C3.1.0	
			1

- E.8.1 An account holder can only transfer certificates of the standard it is registered for. EECS (or national) GOs on the account cannot be transferred from one standard to another. National GOs (non-EECS certificates) may not be transferred over the AIB hub.
- E.8.2 The account holder will get secure electronic access to the account to make transfers of EECS (or national) GOs to another account in the registry considering what is set out in section E.8.1.
- E.8.3 The account holder will get secure electronic access to the account to make transfers of EECS GOs to another registry in another Domain through the website of the registry.
- E.8.4 Only persons duly authorized by the account holder may request the transfer of EECS GOs out of that account holder's account. Authorized persons can be added by the main user of that account holder.
- E.8.5 The initiation of transfers is done in the registry by the selling account holder, who is responsible for transferring the EECS (or national) GOs corresponding to the agreed information to the buyer. The buyer is responsible for ensuring that the selected EECS (or national) GOs are suitable for the intended use.
- E.8.6 The transfer of EECS (or national) GOs and the confirmation of that transfer are automated.
- E.8.7 After the account holder has initiated the transfer, the system instantly displays a message of whether the initiation has been successful.
- E.8.8 In transfers between accounts in two different registries, the success of the transfer is subject to the verification process of the AIB HUB and the receiving registry. If the transfer is not successful, the EECS GOs are returned to the account of the original account holder. When EECS GOs are "in transit" they are not available for another transfer. EECS GOs leave the initiating account holder's account before appearing in the buying account holder's account.
- E.8.9 In transfers between accounts in two different registries, Gasgrid Finland will cooperate with other members of the EECS scheme to amend its own, or the other members' account holder information.
- E.8.10 EECS (or national) GOs that have been cancelled or expired are not available for transfer.
- E.8.11 Where it is impossible to transfer for technical reasons, this can be overcome by cancelling EECS GOs for use in another domain, with the agreement of the importing Issuing Body. Any such cancellations are notified to the "importing" Issuing Body and the AIB Secretariat.
- E.8.12 The details of the Ex-Domain cancellations are set out within section E10.7 and E.10.8 of this document.
 - In principle, all EECS (and national) GOs are transferrable to Gasgrid Finland registry, but only EECS (and national) GOs issued in EU and EEA countries are valid for disclosure purposes. The recognition of EECS (and national) GOs is further regulated in sections 16 and 18 of the Finnish Act on Guarantees of Origin for Energy (1050/2021). The instructions for recognizing GOs







in Finland have been set out by the Finnish Energy Authority and can be found on https://energiavirasto.fi/energian-alkupera, further information go@energiavirasto.fi.

E.9 Administration of Malfunctions, Corrections and Errors

This section demonstrates compliance with the following EECS Rules:

C5.1.7	C8.4.1	C8.4.2	C8.4.3	C8.5.1
D9.1.2				

- E.9.1 Once issued, the details of an EECS (or national) GO cannot be altered or deleted except to correct an error.
- E.9.2 Gasgrid Finland will make reasonable efforts to carry out corrective measures, for example cancel or transfer EECS (or national) GOs in the registry, which have been issued or transferred incorrectly. If EECS GOs from another EECS GO registry have been transferred to the gas and hydrogen register in Finland, Gasgrid Finland attempts to resolve the problem in cooperation with the Issuing Body of the transferring register and primarily, to transfer such EECS GOs back to the original register.
- E.9.3 If it is detected that an EECS (or national) GO's information is incorrect irrespective of whether the reason is due to the actions or neglect of the related production device's registrant,
 - Gasgrid Finland either invalidates these EECS (or national) GOs on the account or rectifies the error during the following months by issuing correspondingly more or less EECS (or national) GOs of origin for the same production device of the same account holder.
 - the registrant must pay Gasgrid Finland the reasonable expenses arising from the transactions relating to the incorrect EECS (or national) GOs and their rectification.
 - Gasgrid Finland aims, in cooperation with other Issuing Bodies, to invalidate incorrect EECS (or national) GOs if the EECS (or national) GOs are no longer located in Finland.
- E.9.4 Gasgrid Finland can also make changes to EECS (or national) GOs in its own register database to rectify an error if the following conditions are fulfilled:
 - The account holder has approved the implementation of such a change.
 - It can be reasonably demonstrated that any unjustified benefit possibly gained by a participant in the EECS (or national) GO system as a result of an error on its part has been invalidated to the extent reasonably possible.
 - It can reasonably be demonstrated that the change does not bring an unjustified benefit to the account holder.
- E.9.5 Gasgrid Finland acts in cooperation with other Issuing Bodies in handling incorrectly issued EECS (or national) GOs. The information of an issued EECS (or national) GO can only be changed for the purpose of rectifying an error.

E.10 End of Life of EECS (or national) GOs – Cancellation







C5.2.3	C6.1.1	C7.1.1	C7.2.1	C7.2.2
C7.2.3	C7.3.1	E3.3.10	N3.1.1	03.1.1

- E.10.1 Cancellation is removing an EECS (or national) GO from circulation. Once cancelled EECS (or national) GO cannot be moved to any other account, and so is no longer tradable.
- E.10.2 Account holders with EECS (or national) GOs in the registry may cancel them. Cancelling means using an EECS (or national) GO, i.e., removing it from circulation and recording it for a specific notified purpose. An account holder must specify the EECS (or national) GOs to be cancelled, as well as the country in which consumption takes place, the purpose of cancellation, use category, name, type, and location of the beneficiary (user), as well as the related consumption period. The conversion cancellation is allowed only for national GOs.
- E.10.3 Cancellation of an EECS (or national) GO requires the consent of Gasgrid Finland until further notice. EECS (or national) GOs can only be cancelled once.
- E.10.4 Cancelled EECS (or national) GOs are removed from the account holder's account by changing their status to 'cancelled', and after cancellation, they are not visible on any of the register's accounts. The account holder implementing the cancellation has full rights to seeing the information concerning the cancellation, and this can also be printed out from the register.
- E.10.5 When a cancellation has been implemented, the account holder receives a notification about the success or failure of the cancellation immediately, direct from the register.
- E.10.6 An official Cancellation Statement can be printed out from the registry by the account holder organisation, which has performed the cancellation. The transaction number of the Cancellation Statement is unique for each cancellation. At the request of the account holder, a Cancellation Statement can be signed electronically by Gasgrid Finland.
- E.10.7 Cancellation for usage in another Domain outside of Finland (i.e., Ex-Domain Cancellations from Finland) are allowed under the following restrictions when transfer over the AIB hub is not possible and if agreed between Issuing Bodies:
 - Where possible, GOs should be cancelled in their entirety or otherwise in as large an issuance bundles as possible. As a rule, installation specific GOs issued in one month may not be split into several different cancellations. One cancellation may include several whole issuance bundles.
 - At the request of the account holder, Gasgrid Finland sends without undue delay a Cancellation Statement by encrypted email to the receiving Domain. GOs cancelled in Finland are stored in Finland's Registry. If necessary, Gasgrid Finland stores the information manually.
- E.10.8 Cancellation for usage in the Domain of Finland (i.e., Ex-Domain Cancellations to Finland) are allowed under the following restrictions when transfer over the AIB hub is not possible and if agreed between Issuing Bodies:
 - The cancellation statements must primarily be sent by encrypted email to Gasgrid Finland so that the registrar of the registry in the country of the origin sends the Cancellation Statement. Gasgrid Finland forwards without undue delay this information and the relevant documents by encrypted email to the account holder to whom the cancellation







is addressed. Alternatively, the account holder of the origin registry may also create viewing rights to cancellation statements in the registry of the country of origin for Gasgrid Finland. This means that Gasgrid Finland can check the correctness of the information straight from the registry. In an exceptional case, the parties may agree beforehand that the account holder sends the Cancellation Statement by encrypted email to Gasgrid Finland. Gasgrid Finland must be able to verify the correctness of the cancellation statement.

- Where possible, EECS (or national) GOs should be cancelled in their entirety or otherwise in as large an issuance bundles as possible. As a rule, installation specific EECS (or national) GOs issued in one month may not be split into several different cancellations. One cancellation may include several whole issuance bundles.
- Gasgrid Finland stores Ex-Domain Cancellations and their related documents in a separate database.
- E.10.9 According to the Finnish Energy Authority regulation (https://energiavirasto.fi/docu-ments/11120570/12762067/Määräys.pdf, only in Finnish), the obligation to certify the origin of gas/hydrogen informed as having been produced from renewable energy sources must be met by cancelling EECS (or national) GOs allocated to the previous calendar year with the registrar by 31st March the following year. Gasgrid Finland shall report to the Finnish Energy Authority by 15th April the amounts of issued, cancelled, imported, exported, and expired GOs from previous year.

E.11 End of Life of EECS (or national) GOs – Expiry

This section demonstrates compliance with the following EECS Rules:

C5.2.3	C6.1.1c	E6.2.1h	

- E.11.1 EECS (or national) GOs cease to be valid for transfer twelve (12) months after the end of the period during which the output to which they relate was produced.
- E.11.2 EECS (or national) GOs cease to be valid for cancellation twelve (12) months after the end of the period during which the output to which they relate was produced.
- E.11.3 Expiry is an automated event that the registry performs 12 months after the end of the production device's production period in question. The expiry warning is set to 91 days in the registry.
- E.11.4 For EECS (or national) GOs whose validity has ended, export is prevented.

E.12 End of Life of EECS (or national) GOs – Withdrawal

This section must demonstrate compliance with the following EECS Rules:

C5.2.3	C6.1.1	C8.2.1	

E.12.1 Gasgrid Finland may withdraw an EECS (or national) GO held in an account on its registry at the request of the account holder of that account or otherwise in accordance with the







provisions of the EECS schemes. For example, to give effect to an agreement reached with an account holder under provisions of its STC that meet the criterion at EECS Rules, EECS (or national) GOs may be withdrawn (or amended) by Gasgrid Finland having regard to the objective of securing the accuracy of EECS (or national) GOs to ensure that no unjust enrichment occurs as a result of an error of any unauthorized access to, or malfunctioning of, a registry.

E.13 Publicity and confidentiality

- E.13.1 According to the Finnish Act on the Openness of Government Activities (621/1999), documents of the authorities are public, unless otherwise specifically provided for in the Act or other legislation. Confidentiality obligations and deviations from them are provided for in Chapters 6 and 7 of the Act on the Openness of Government Activities.
- E.13.2 In principle, Gasgrid Finland publishes a list of all registered account holders and the production devices.
- E.13.3 Confidential material and confidentiality obligations are described in more detail in the STC.

F ISSUER'S AGENTS

F.1 Production Auditor

This section must demonstrate compliance with the following EECS Rules:

None directly			
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F.1.1 Production Auditors (verifiers) verify production declarations and (where appropriate) consumption declarations made by registrants of production devices when deemed necessary by Gasgrid Finland. Production Auditors are independent from the owners of the production devices.

F.2 Production Registrar

This section must demonstrate compliance with the following EECS Rules:

None directly		
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- F.2.1 Gasgrid Finland is the Production Registrar. Each account holder can add production devices in the registry and send them there to Gasgrid Finland for approval.
- F.2.2 Contact details for the principal roles and Issuing Body agents are given in Annex 1.

F.3 Measurement Body(/ies)

This section demonstrates compliance with the following EECS Rules:

H2.2		

F.3.1 The measurement roles and functions are described in sections B.3 and E.3.







G ACTIVITY REPORTING

G.1 Public Reports

This section demonstrates compliance with the following EECS Rules:

E2 2 /	HPA section 14.2	
L3.3.4	HEA SECTION 14.2	

- G.1.1 For each technology, statistical information is published on the following website https://gasgrid.fi/en/our-services/guarantees-of-origin/, regarding:
 - EECS (and national) GOs issued, transferred internally intra-domain, imported, exported, cancelled, expired during each month prior to the current month,
 - EECS (and national) GOs issued, transferred internally intra-domain, imported, exported, cancelled, expired in relation with the energy produced during each month prior to the current month,
 - EECS (and national) GOs imported through a bilateral connection.

G.2 Record Retention

This section demonstrates compliance with the following EECS Rules:

A12.1.1 C5.1.2 D8.1.2	A12.1.1	C5.1.2	118 1 /	
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G.2.1 Data stored in the electronic registry, metering production data and all records relating to EECS (and national) GOs are retained for 6 years in electronic format, which is either in an electronic archive or by means of database backups.

G.3 Orderly Market Reporting

This section demonstrates compliance with the following EECS Rules:

E4.2.5 E4.2.6	E4.2.7	
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- G.3.1 Gasgrid Finland cooperates with the national VAT Fraud Authority. In case of any notices of a fraud, Gasgrid Finland also informs the AIB and other relevant parties.
- G.3.2 If the account holder is not compliant with STC, Gasgrid Finland will take necessary actions, informs AIB and other relevant parties. This includes also anticompetitive issues.

H ASSOCIATION OF ISSUING BODIES

H.1 Membership

C2.2.6	C2.2.7		
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- H.1.1 The Association of Issuing Bodies (AIB) brings together the Issuing Bodies of European energy certificate schemes. The AIB promotes the use of a standardised system, based on a harmonised environment, structures and procedures in order to ensure the reliable operation of European energy certificate systems. With its independent and peer reviews, and its periodic audits, the AIB provides a robust framework for reliable and fraud resistant EECS GO system. Among others, it can also act by suspending transfers through the Hub. Membership of AIB facilitates mutual recognition of GOs across Europe.
- H.1.2 In case Gasgrid Finland ceases to be a scheme member of an EECS Scheme, it shall revise its registry so that every production device registered therein ceases to be registered for the purposes of EECS. EECS GO issuing under EECS would stop, and EECS GOs would remain tradable only until expiry.
- H.1.3 In case Gasgrid Finland ceases to be the authorised Issuing Body for EECS GOs, it shall revise its registry so that each production device in the Domain ceases to be registered for the purposes of EECS GOs, it shall stop issuing EECS GOs and after a transitional period the registry shall be taken offline.

H.2 Complaints to the AIB

This section must demonstrate compliance with the following EECS Rules:

None directly	(J1.1.2)		
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- H.2.1 An account holder is allowed to notify the Secretary General of AIB in writing in case:
 - a) an authorised Issuing Body in relation to an EECS GO is in breach of any of the provisions of product rules in relation to EECS GO; or
 - b) any product rules do not comply with the relevant provisions of the EECS Rules, and evidence is provided substantiating such allegation, and that the authorised Issuing Body has been given adequate opportunity to respond to such allegation.

The General Secretary of AIB shall invite the relevant authorised Issuing Body to respond to the allegation.

I CHANGE CONTROL

I.1 Complaints to Gasgrid Finland

This section must demonstrate compliance with the following EECS Rules:

None directly		

I.1.1 According to the Finnish legislation⁹ it is possible to appeal against decisions made by the registrar referred to in the Act on Guarantees of Origin of Energy on the basis of the said Act. A party that is dissatisfied with a decision can submit a written appeal. An appeal can be

⁹ The Administrative Procedure Act 434/2003, The Act on Guarantees of Origin for Energy 1050/2021, The Act on Electronic Services and Communication in the Public Sector 13/2003







- submitted by a party whom the decision concerns or whose right, obligation or benefit the decision impacts directly (an interested party). The appeal is addressed to Gasgrid Finland.
- I.1.2 The appeal must be submitted within 30 days from receiving the decision. A party is considered to have been informed of an electronic decision, unless otherwise demonstrated, on the third day of the message having been sent from the registry database. If the decision has been issued as a letter, the recipient is considered to have been informed of it, unless otherwise demonstrated, on the seventh day of the letter having been sent.
- I.1.3 An appeal must be submitted in writing (an electronic document also fulfils the requirement of written format) and it must refer to the decision appealed against and state the correction requested and the grounds for the request. In addition, the appeal must state the company submitting the appeal, as well as the name and contact details (address, email and telephone number) of its contact person.
- I.1.4 The appeal must be submitted within the appeal period either electronically customerservice@gasgrid.fi or by post to Gasgrid Finland Oy, Keilaranta 13-19 B, FI-02150 Espoo, Finland. An electronic document does not need to be supplemented with a signature if the document contains information about the sender and there is no reason to suspect the originality of the document.
- I.1.5 Gasgrid Finland shall consider an appeal without undue delay. A decision for which an administrative appeal may be requested shall not be enforced until it has become final. However, a decision may be enforced before it has become final if so provided by law or if the nature of the decision is such that it has to be enforced immediately or if the deferral of enforcement would not be in the public interest. When a request for an administrative appeal has been submitted, Gasgrid Finland considering it may prohibit the enforcement of the decision or order that the enforcement be suspended. When Gasgrid Finland has admitted for consideration a request for an administrative appeal, it may decide to amend the administrative decision, rescind it or reject the request for review.
- I.1.6 Only the person who has made the adjustment request may appeal the decision given on the adjustment request. The appeal against the authority's (Issuing Body Gasgrid Finland) decision is made to the administrative court.

I.2 Disputes

None directly			
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- I.2.1 The contract parties shall primarily seek to settle any disputes relating to contract, its validity and/or interpretation through negotiation. If the parties cannot reach contract by negotiation, disputes arising from the contract shall be settled by the Helsinki District Court. Appeals against decisions made by Gasgrid Finland are provided for in I.1. and in section 37 of the Act on Guarantees of Origin for Energy (1050/2021).
- I.2.2 The dispute resolution process is without prejudice to the account holder's right to seek a review of a decision on EECS (and national) GOs in accordance with the Finnish Administrative Procedure Act (434/2003) and the Finnish Administrative Judicial Procedure







Act (808/2019). Appeals to the Administrative Court are provided for in the Administrative Judicial Procedure Act (808/2019).

I.3 Change Requests

E4.2.3	E6.2.1e	L5.1.1	

- I.3.1 An account holder may propose a modification to this Domain Protocol.
- I.3.2 Such a proposal will include a detailed description, including an exact specification of any proposed modification of this Domain Protocol and be passed in writing to Gasgrid Finland.
- 1.3.3 Gasgrid Finland will process the change request and inform the AIB on the matter.
- 1.3.4 Any changes to the terms of service require an approval of the Finnish Energy Authority.







ANNEX 1 CONTACTS LIST

AUTHORISED ISSUING BODY/REGISTRY OPERATOR

Company name	Gasgrid Finland Oy
Contact person	Heli Haapea
Department	
Address	Keilaranta 13-19 B, FI-02150 Espoo, Finland
Phone number	+358 40 3527643
E-mail address	customerservice@gasgrid.fi
	heli.haapea@gasgrid.fi
Website	https://gasgrid.fi/en/our-services/guarantees-of-origin/

COMPETENT AUTHORITY (IF DIFFERENT FROM THE AUTHORISED ISSUING BODY)

Company name	Same as an Authorised Issuing Body/Registry Operator
Contact person	
Department	
Address	
Phone number	
E-mail address	
Website	

REGISTRY SUPPORT

Company name	Same as an Authorised Issuing Body/Registry Operator
Contact person	
Department	
Address	
Phone number	
E-mail address	
Website	

PRODUCTION REGISTRARS

Company name	Same as an Authorised Issuing Body/Registry Operator
Contact person	
Department	
Address	
Phone number	
E-mail address	
Website	







	PRODUCTION AUDITORS
Company name	The Production Auditors are listed on the website of Energy Authority https://energiavirasto.fi/energian-alkupera (Hyvaksytyt arviointilaitokset). Webpage is only in Finnish, more information also in English go@energiavirasto.fi
Contact person	
Department	
Address	
Phone number	
E-mail address	
Website	

MEASUREMENT BODIES

Company name	The measurement roles and functions are described in sections B.3 and E.3.
Contact person	
Department	
Address	
Phone number	
E-mail address	
Website	

COMPETENT BODY FOR DISCLOSURE

Company name	Energy Authority
Contact person	
Department	
Address	Lintulahdenkuja 2 A, FI-00530 Helsinki, Finland
Phone number	+358 29 5050 000
E-mail address	go@energiavirasto.fi
Website	https://www.energiavirasto.fi/en







ANNEX 2 ACCOUNT APPLICATION/AMENDMENT FORM

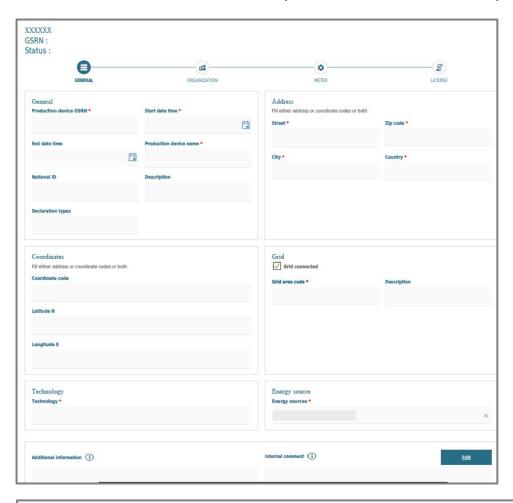
The application is made by filling in and signing a Standard Terms and Conditions (STC) with Gasgrid Finland. The agreement also contains the agreement terms. The agreement must contain the information and documents (contact form, trade register extract or a similar official document and the names of persons authorised to sign (a power of attorney if necessary), the information on which standard(s) the account holder registers), as set out in section D.1.4. A Service Contract (STC) as well as other documents can be found on the website of Gasgrid Finland https://gasgrid.fi/en/our-ser-vices/guarantees-of-origin/



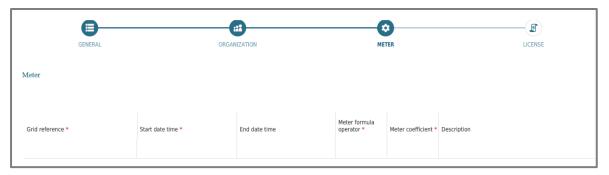




ANNEX 3 DEVICE REGISTRATION FORM (SCREENSHOTS FROM REGISTRY)



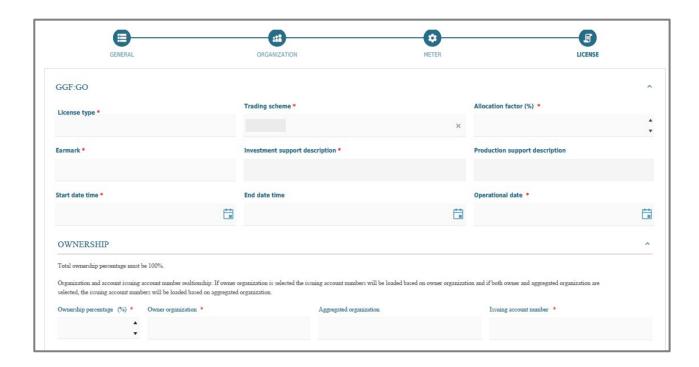


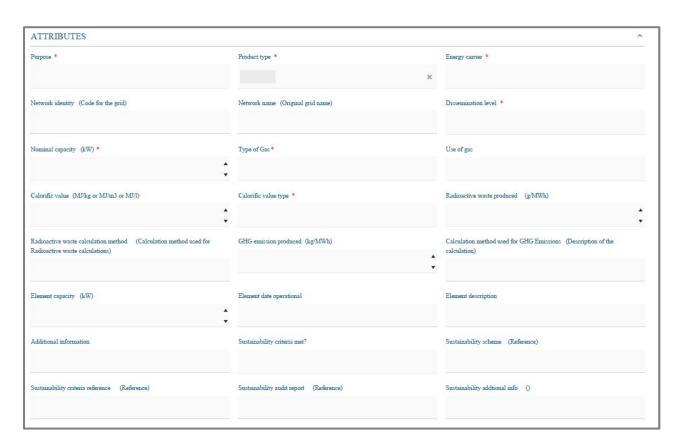














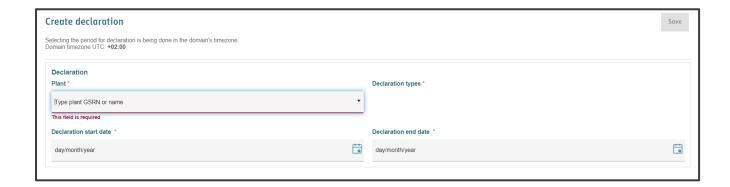




ANNEX 4 PRODUCTION/CONSUMPTION DECLARATION (SCREENSHOTS FROM REGISTRY)

Declarations can be viewed, created, and managed electronically within the registry https://grex.grexel.com/en/public/home. Declaration includes among other details of the production device, capacity, address of the operator, commissioning date, metering point, energy source, production period and amount of net injection into the network.

The data looks like as follows:











ANNEX 5 CANCELLATION STATEMENT TEMPLATE (SCREENSHOTS FROM REGISTRY)

