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TAKING ENERGY FOR OWN USE AND AUXILIARY ENERGY INTO ACCOUNT IN DETERMINING THE ELIGIBILITY OF GAS ENERGY FOR GUARANTEES OF ORIGIN

At the request of Gasgrid Finland Oy, the Energy Authority has issued decision 16/071001/2023 (hereafter the “Energy Authority’s decision”) concerning taking energy for own use and auxiliary energy into account in determining the eligibility of gas energy for guarantees of origin. The Energy Authority’s decision, including rationale, can be found [here](#) (only in Finnish).

Summary of the Energy Authority’s decision

Under the Energy Authority’s decision, guarantees of origin for renewable gas may not be issued for renewable gas that is consumed in the production process of renewable gas. In the register of guarantees of origin for gas, the process gas at the production installation is divided into the gas produced and the gas consumed in the production process. The Act on Guarantees of Origin for Energy and the government proposal state unequivocally that it is not possible to issue guarantees of origin for gas consumed in the production process. Consequently, issuing guarantees of origin for gas that is consumed in the gas production process would be contrary to the Act on Guarantees of Origin for Energy and the preliminary work on the Act regardless of whether the gas originates in the production process or in a process outside it as in the case of fossil gas. This is why the gas consumed in the production process must be deducted from the amount of gas produced in determining the amount of gas eligible for guarantees of origin.

The requirements for the issue, transfer, cancellation and invalidation of guarantees of origin must be in accordance with the future CEN EN 16325 European guarantee of origin standard. The standard will regulate more precisely the taking into account of the energy consumed in the production process and its auxiliary devices in determining the energy eligible for guarantees of origin. Because the standard is still being updated and is thus not yet valid, the requirements in the national Act on Guarantees of Origin for Energy are complied with.

Guideline

The amount of biogas consumed, so-called biogas for own use, in the biogas production process may not be taken into account in the end product, i.e. amount of biogas eligible for guarantees of origin (1). The amount of gas brought from outside the production process must be deducted from the amount of gas produced when determining the amount of biogas eligible for guarantees of origin (2):

1. In accordance with all the verification certificates submitted to Gasgrid Finland by production installations, the biogas used for own use in processes has not been taken into account in the amount of biogas eligible for guarantees of origin (in other words the biogas for own use has been brought into use before measurement of the end product), and so **taking into account biogas for own use requires no further action by**

the production installations and operations continue and guarantees of origin are issued as they have been so far.

If fossil gas (also when used as a reserve fuel) is used as process energy, the amount of gas consumed must be deducted monthly from the amount of gas produced when determining the amount of gas eligible for guarantees of origin. The Energy Authority's decision must be complied with from 1 May 2023 onwards. Calculations confirmed by assessment bodies in relation to the deduction of fossil gas must be submitted to the registrar of the register, Gasgrid Finland, at customerservice@gasgrid.fi.

After 1 May 2023, the registrar of the register must approve these calculations before guarantees of origin can be issued for the relevant production. If the energy production installation uses its own measuring instruments or calculation procedures in measurement, the verifier must evaluate the effect of these on the overall error in determining the amount of energy. If the measurement procedure includes calculated sections, the description must include sources for the constants and formulae used. A procedure may include calculated sections if, for particular reasons, measurement is not possible or is unreasonably difficult.

Going forward, **installations connected to the transmission or distribution network** must report the **amount of gas energy to be** deducted (MWh, upper calorific value) from any end product eligible for guarantees of origin to Gasgrid Finland at customerservice@gasgrid.fi by the 15th day of each month so that the registrar can issue guarantees of origin for the previous month's production. Gasgrid Finland obtains the amount of gas injected into the system from its own systems.

Regarding offgrid installations, the amount of gas energy (MWh, upper calorific value), from which process gas has been deducted, is the production data to be input into the register.

The national energy guarantee of origin system must comply with the requirements of the CEN EN 16325 European guarantee of origin standard. Gasgrid Finland has also joined the Association of Issuing Bodies (AIB) and with membership, EECS (European Energy Certificate System) guarantees of origin will be issued from around autumn 2023. Appendix 1 shows Gasgrid Finland's assessment of the clarifications relating to process /auxiliary energy arising from standard and EECS guarantees of origin.

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Appendix

1 Gasgrid Finland Oy's assessment of changes regarding process energy used as a result of Standard CEN EN 16325 and EECS guarantees of origin

Gasgrid Finland Oy's *assessment* of the changes regarding process energy used as a result of Standard CEN EN 16325 and EECS guarantees of origin

Gasgrid Finland emphasises that the matters presented here are **assessments** and based on current documents, which are partly at the draft stage and which may still change.

Operators will be notified well in advance of changes arising from the Standard and/or EECS GOs.

The national energy guarantee of origin system must comply with the requirements of the *CEN EN 16325 European standard*. Updating work is still ongoing and the standard is expected possibly to enter into force in 2024.

Gasgrid Finland has also joined the Association of Issuing Bodies (AIB) and with membership, EECS (European Energy Certificate System) guarantees of origin will be issued from around autumn 2023. EECS guarantees of origin among other things allow transfers between other AIB member registers via the hub managed by AIB.

There are similarities, for example relating to process/auxiliary energy, in the draft of the standard and EECS guarantee of origin rules. The current estimate is that EECS rules will be applied in autumn 2023 and the standard possibly in 2024. **Operators will be notified well in advance of changes arising from EECS GOs and the Domain Protocol (terms) and among other things there will be a possibility for comments on changes in terms in accordance with the Act on Guarantees of Origin for Energy.** Likewise, the changes arising from the standard will also be notified in good time. The changes may require confirmations made by the assessment body.

At this stage, it is good to be aware that gas EECS guarantees of origin are issued in accordance with EECS rules solely for net gas production, i.e. for the amount after which so-called production process energy has been deducted. The amount of the fossil energy, such as fossil electricity, natural gas or oil, used in production processes that exceeds 2 % of the energy production must be deducted when determining the amount of gas eligible for guarantees of origin. The energy remaining under the 2 % limit would not appear to affect the number of guarantees of origin. The deduction would also apply to auxiliary power when used and when exceeding 2 % of energy production.

If the energy content of fossil fuels used in the maintenance and startup of a production installation is a maximum of 2 % of the sum of the energy contents used by the installation in a calendar year, in addition to the one source of renewable fuels, it can be considered that the installation uses only one source of energy and there is no need to determine the production shares.

Energy used for pressurisation or liquefaction to transport gas or to process digestate is not considered as auxiliary energy. Nor would energy consumed in waste treatment, including wastewater treatment be auxiliary energy where treatment is necessary for waste treatment independent of the production process. These would not appear to affect guarantees of origin even if fossil energy is consumed.