



The this is an English translation of the Danish version of the guidelines. In the event of a discrepancy between the Danish and English versions, the Danish version will apply.

Guidelines for guarantees of origin for renewable gas

Version 1.1

1st October 2021

Annex

Annex 1: Request for registration as account holder

Annex 2: Agreement on Guarantees of Origin for Gas from Renewable Energy Sources

Annex 3: Application form for establishment of an account and issuing of GOs for RE-gas

Annex 4: Sworn statement on investment aid

Annex 5: Audit instructions for cancellation on GOs for RE-gas

Annex 6: Audit instructions for used biomass

Annex 7: Guide to the Register of GOs for RE-gas

The applicable versions of the annexes can be viewed on the Issuing Body's website.

Preface

The Executive Order on guarantees of origin for electricity, gas, district heating and cooling from renewable energy sources¹ enters into force on 30 June 2021 and then regulates Guarantees of Origin for from renewable energy sources – GOs for RE-gas - (former biomethane certificates). The previous Rules for Biomethane certificate, now "Guidelines for guarantees of origin for renewable gas", describe Energinet's administration of GOs for RE-gas. Compared to Rules for Biomethane Certificates, version 2.1, the Guidelines for guarantees of origin for renewable gas, version 1.0, contain the following adjustments:

- Energinet has in accordance with Executive Order per 7 June 2021 introduced a user fee for directly referable costs associated with the administration of the GO scheme RE-gas.
- Information on whether an Upgrading Facility has received investment aid has been added as a requirement to the GOs for RE-gas.
- The term Biomethane Certificate has been changed to GO for RE-gas.
- Clarifications and minor linguistic changes have been made.

This updated version 1.1. of Guidelines for guarantees of origin for renewable gas" entering into force on 1 October 2021 has following additional adjustments:

- Energinet issues GOs for RE-gas to the owners of upgrading facilities that inject the gas to the gas system and not to the biogas plant.
- New Annex 2: Agreement on Guarantees of Origin for Gas from Renewable Energy Sources
- New Annex 3: Application form for establishment of an account and issuing of GOs for RE-gas (in Danish only)
- New Annex 4: Sworn statement on investment aid. (in Danish only)

¹ Executive Order No 1216 of 7 June 2021 on guarantees of origin for electricity, gas, district heating and cooling from renewable energy sources.

1 Introduction

The Executive Order on guarantees of origin for electricity, gas, district heating and cooling from renewable energy sources, effective on 30. June 2021 regulates Guarantees of Origin for renewable gas (GOs for RE-gas).

Guidelines for guarantees of origin for renewable gas describes Energinet's administration of the issuance, transfer and cancellation of GOs for RE-gas and the requirements that Energinet imposes on the market players for GOs for RE-gas.

It follows from § 3 of the Act on Guarantees of Origin that Energinet is the authority regarding issuance, transfer, cancellation, and supervision of GOs for RE-gas covered by the Natural Gas Supply Act.

Energinet shall manage the administration of GOs for RE-gas including the tasks of the scheme related to GOs for RE-gas injected to the natural gas system, as Energinet has the relevant data for gas production.

Article 19 point (1) to (13) of the RENEWABLE ENERGY Directive² lays down rules for GOs for RE-gas. The Directive has been implemented into Danish law as well as the associated Executive Order cf. the above, which forms the basis for Energinet's administration of the GOs for RE-gas scheme.

The purpose of a GO for RE-gas is to enable consumers to purchase energy from renewable energy sources and proof of origin in addition to their purchase of energy.

A GO for RE-gas is an electronic document whose primary function is to document to an end consumer that a given share or amount of energy has been produced from renewable energy sources. GOs for RE-gas are thus the necessary documentation for the renewable energy purchased and, at the same time, ensure that it has not already been sold to other consumers.

² DIRECTIVE (EU) 2018/2001 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2018 on the promotion of the use of energy from renewable energy sources (recast), link: <https://eur-lex.europa.eu/legal-content/DA/TXT/PDF/?uri=CELEX:32018L2001&from=LV>

The GO for RE-gas system is based on an electronic register. Thus, no physical GOs for RE-gas are issued by the Issuing Body. In addition, the GO system allows for the transfer of a GO for RE-gas from an Account holder to an account owner in the DENA register (and vice versa) and to declare gas at the border.

1.1 *Entry into force*

These Guidelines for guarantees of origin for renewable gas, version 1.1, enters into force on 1 October 2021 and replaces at the same time Rules for Biomethane Certificates, version 2. 1.

2 Definitions

2.1 *Definitions used*

Except in the cases where the context dictates otherwise, the words that are specified in this item 2 must have the meaning in Guidelines for guarantees of origin for renewable gas as appears below, when the words are written in capital letters. This applies regardless of whether the words are used in singular or plural form, in definite or indefinite form, unless otherwise is stated from the context.

Cancellation is made by the account holder when the GO for RE-gas is sold to a consumer or for export. Cancellation means that the GO for RE-gas is no longer in the account holder's account.

Working day means any day from Monday to Friday, except for public holidays and closing days, which are listed in the Issuing Body's calendar, which can be found on the website: www.energinet.dk.

Biogas is gas produced from anaerobic fermentation of organic materials from manure, sewage sludge, energy crops or organic waste, thereby forming a gas in which methane and CO₂ are the main components.

Biomass is the biodegradable part of products, waste and residues of biological origin from agriculture (including vegetable and animal substances), forestry and related industries, including fisheries and aquaculture, and the biodegradable part of industrial and municipal waste.

Biomethane is Biogas which has been upgraded to meet the quality requirements of natural gas in Denmark and is injected into The Danish Gas System or The German Gas System.

Account is an electronic account of GOs for RE-gas.

Account Holder is any physical or legal person registered in the Register who can act in accordance with the Guidelines for guarantees of origin for renewable gas.

DENA is Deutsche Energie-Agentur GmbH, who are responsible for issuing the GO for RE-gas in Germany.

The Danish Gas System comprises the transmission system, the distribution grid and the storage facilities in Denmark.

The German Gas System is the transmission system, distribution grid and storage facilities in Germany.

"Ex-domain export" is the cancellation of the GO for RE-gas in a country's Certificate Register prior to the transfer of the GO for RE-gas to another country's Certificate Register.

GRSN (Global Service Relation Number) is the number that any Metering Point for Price Supplement must have with a view to identifying the metering point.

Investment Aid is either funding from the Energy Agreement 2012, which involved the establishment of grant equivalence of biogas for the gas system with biogas for cogeneration or funding from the pool from renewable energy for process (Danish: VE til Process), which was established in 2013 and closed down again as of 1. January 2017.

DENA Account Holder is any is any physical or legal person registered in the in the DENA certificate register.

Account Holder is any is any is any physical or legal person registered in the Danish Register for GOs for RE-Gas, cmo.grexel.com.

Metering Point for Biomethane is the point at which the energy and quality of Biomethane supplied to the Danish Gas System is measured. The Metering Point

for Biomethane will coincide with the Metering Point for Feed-in Subsidy if the calorific value of the Biomethane is not adjusted.

Metering Point for Price Supplement is the point at which the energy and quality of Biomethane, which forms the basis for the payment of both price supplements under Section 35c of the Natural Gas Supply Act and the issuance of Guarantees of Origin, is measured. The Metering Point for Price Supplement will coincide with the Metering Point for Biomethane if the calorific value of the Biomethane is not adjusted.

Grid Owner is the owner of the infrastructure company who establishes the connection of the Upgrading Facility to the Danish Gas System. The Grid Owner may be a distribution company (Evida) or the transmission company (Energinet).

Upgrading Facility is the plant for upgrading Biogas to Biomethane.

The Upgrading Owner is the physical or legal person who owns the Upgrading Facility.

Guarantee of Origin (GO) is an electronic certificate documenting 1 MWh of Biomethane.

Guarantee of Origin Agreement is an agreement between the Issuing Body and the Account Holder, which contains the terms that any physical or legal persons must meet to act as the Account Holder in the Register.

The Register is an electronic system used, inter alia, for registration, issuing, transfer and cancellation of GOs for RE-gas.

Guidelines for the Guarantee of Origin for Renewable Gas are these guidelines for GOs for RE-gas, including annexes, in the version in force at any given time.

The Issuing Body is Energinet, which issues the GOs for RE-gas on basis of measurements in the Metering Point for Price Supplements, made by Grid Owner. The issuing happens through the Register, which Energinet administrates, which also contains several functionalities, including the possibility of transferring GOs for RE-gas.

Price Supplements is the supplement that the Danish Energy Agency pays in the form of aid to the Upgrading Owner on basis of the Natural Gas Supply Act. This is registered as feed-in subsidy on the GOs.

3 The Register

3.1 Registration as Account Holder

To act as Account Holder in the Register, the former must be registered.

The following criteria forms the basis for entry in the Register:

- A. These companies are generally admitted without further documentation:
 - Biogas producers and Upgrading Owners who have a signed connection agreement with the national distribution company Evida or Energinet,
 - Biomethane sellers, gas supplier or shippers in the Danish gas market, or
 - companies known and recommended by other European registers.

- B. The Issuing Body assesses applicants who do not fall into the above categories on the basis of a "Know-Your-Customer" criteria, and the Issuing Body may require additional documentation, e.g. for confirmation of a company's financial health.

The application for registration as Account Holder in the Register shall be made by completing Annex 1 and sending it to the Issuing Body by e-mail to gascertifikat@energinet.dk.

The following information on the Account Holder shall be provided:

- Name, address, zip code, city, and country
- CVR number
- Contact information (name, phone number and email address of contact person)
- User and responsible person for managing the account holder's account on the IT system.

If the requirements for registration in the Register are met, the Issuing Body shall prepare a GO for RE-gas agreement in accordance with Annex 2, on the basis of

the information contained in the application or register the Upgrading Plant upon receiving a signed request from the Upgrading Owner.

The signed agreement or request in pdf form is sent by e-mail to gascertifikat@energinet.dk. The documents must be available to the Issuing Body no later than 5 working days before a change of month for the Account Holder to be registered in the Register for the following month.

If all the above information has been provided adequately, the Issuing Body will complete the registration within 5 business days and the Account Holder will receive its log-in information for the Register.

Users of the Register are automatically disabled one year after registration and the access to the Register must be reactivated annually. This is done by contacting the Issuing Body by e-mail at gascertifikat@energinet.dk

3.2 *Request for GOs for RE-gas and linking of Upgrading Facility to Account*

Any owner of an Upgrading Facility which injects gas to the Danish Gas System is entitled to have an Account created and linked with its Upgrading Facility. The request to set up an account and linking the Upgrading Facility is made by filling in a request form (Annex 3) and sending it in PDF format per e-mail to gascertifikat@energinet.dk.

In order for an Upgrading Facility to be linked to the Account, The Upgrading Facility must produce Biogas, which is upgraded to Biomethane and injected to the Danish Gas System.

The following information on the Upgrading Facility shall be provided at the time of the request by filling in Annex 3:

- The Upgrading Facility's address, zip code, city, country and CVR number
- The Upgrading Facility's capacity in kWh/year (from connection agreement with Grid Owner)
- Whether the Upgrading Facility has received production aid (Feed-in subsidy)
- Whether the Upgrading Facility has received investment aid (Declaration of Faith and Law (Annex 4))
- The start-up date of the Upgrading Facility
- The type of the Upgrading Facility:

- Unspecified
- Based on landfill gas
- Based on wastewater gas
- Based in agricultural gas
- Based on waste from organic waste digestion
- Based on process/industrial waste
- GSRN in Measuring Point for Price Supplements

An Upgrading Facility which is linked with an Account may not otherwise sell of the origin value (RE-value) of the Biomethane produced.

3.3 *Updating the information about the Account Holder and Upgrading Facility*

The account holder is obliged to continuously update the information on the Account Holder. The same applies to Upgrading Facilities that the Account Holder has linked with the Account. No later than 5 business day before a change of month Account holders must notify the Issuing Body of the changes to be made in the Register for the following month.

The updated regulation will enter into force on the first day of the following month.

3.4 *Decommissioning of an Upgrading Facility*

If an Upgrading Facility is no longer to be linked with an Account, it is the responsibility of the relevant Account Holder to send a written notification to the Issuing Body by e-mail to gascertifikat@energinet.dk. The decommissioning of the Upgrading Facility must happen before the end of the relevant month and the Issuing Body changes the registration in the Register on the basis of this e-mail.

3.5 *Closure of an Account*

The Issuing Body may close an Account in the event of a breach of the Guarantee of Origin agreement. The breach may be, for example, that the Account Holder fails to submit an auditor's statement within the time limit or to update the information in the Register.

An Account Holder may at any time close its Account by giving 10 working days' notice. Before closing the Account all active GOs for RE-Gas must be either transferred to another Account Holder or cancelled.

When the Account no longer contains active GOs For RE-gas, the Account is inactive, as the Account is not deleted for the preservation of the GO for RE-gas history.

3.6 *The Register*

GOs for RE-gas are issued through the electronic Register which the Issuing Body will choose by its own assessment. The Account Holder bears its own costs of accessing and maintaining access to the Register. The Account Holder is responsible for having a compatible IT system and adequate IT security in relation to the access and use of the Register.

The Issuing Body shall be entitled to restrict or impede the Account Holder's access to the Register if there is an abuse thereof or if the Account holder fails to fulfil its obligations under the Guarantee of Origin Agreement or Guidelines for guarantees of origin for renewable gas.

The expected uptime for the Register is likely to be 99.5% per year excluding planned downtime. The Issuing Body will endeavor to inform the Account Holders of planned downtime with appropriate notice. The Issuing Body reserves the right to take the Register out of service without notice by, among other things, critical system updates.

4 Guarantees of Origin

4.1 *Issue of a Guarantee of Origin*

Only Account Holders with an active Account to which an Upgrading Facility is linked can be issued GOs for RE-gas. The issue is made automatically every month to all Account Holders with linked Upgrading Facilities without any prior request other than the initial request for issue of GOs (Annex 3).

GOs for RE-gas shall be issued by the Issuing Body monthly and with a standard size of 1 MWh on the basis of measurements from Grid Owner in the Metering Point for Price Supplements at the end of the month.

If several Biogas plants supply using the same Upgrading Facility, several GSRN are established by Grid Owners to enable distribution of the measurements in the

Metering Point for Price Supplements to form the basis for issuing the GO for RE-gas.

If other types of gas, including propane, is added to adjust the biomethane, this supply of energy shall be measured by Grid Owner at the Metering Point for Biomethane.

If production does not correspond to 1 MWh for one month a GO for RE-gas shall be issued in the month in which production does correspond to 1 MWh or be used for correction referred to in point 4.3

The date of issue of GOs for RE-gas and the date on which new GOs are attributed to an Account shall be the 10th working day following the last day of the month of production.

The Register shall contain the following information for each GO for RE-gas:

- VAT number for the Upgrading Facility
- Physical and legal location of Upgrading Facilities
- Capacity of the Upgrading Facility in kWh/year
- Start-up date of the Upgrading Facility
- Type of Upgrading Facility
- GSRN for the Metering Point for Price Supplements
- Whether production aid (Feed-in subsidy) has been granted in the form of price supplement under Section 35c of the Natural Gas Supply Act
- Whether the Upgrading Facility has received Investment Aid
- The Issuing Body
- Date of issue
- Issuing country
- Identification number of the GO for RE-gas
- Unit (1 MWh)
- Production period for the Biomethane
- Expiration date (12 months after the last date of the production period).

4.2 *Whole or partial renunciation of Price Supplement for upgraded Biogas*

GOs for RE-gas are generally issued based on the quantity of upgraded biogas receiving the Price Supplement. Therefore, the Biogas will as a rule have received production aid and be registered as such. However, it is possible for the owners of the Upgrading Facilities to waive the Price Supplement from the Danish Energy

Agency in whole or partially. When Energinet receives documentation from the Danish Energy Agency, Energinet can then issue a GO for RE-gas to the specific Upgrading Facility for the given quantity during the given period, indicating that the facility has not received production aid.

Similarly, the registration will specify that the facility has received other types of aid, such as Investment Aid.

Irrespective of the type of aid, it must be documented prior to the issue of GOs for RE-gas if registration is to be carried out in such a way as to show that no aid has been granted to the facility.

If GOs for RE-gas are requested where it appears that the gas has not received any aid under the Executive Order, the owner of the Upgrading Facility must provide documentation, including a statement from the Danish Energy Agency.

4.3 *Adjustment of the number of Guarantees of Origin by corrections*

The Issuing Body receives continuously updated/corrected measurement data from the Grid Owner. The amount of GOs for Re-gas issued is adjusted monthly backwards based on corrected measurement data from Grid Owner. Corrections are made quarterly for the full 3 previous months. Thereafter, no further corrections will be made for the same period unless, in the opinion of the Issuing Body, special circumstances prevail.

For correction, the difference that was present after the issue of the GO for RE-gas is recorded at the end of the month. The difference is corrected up or down with the size of the correction. If the correction is of a size which causes the difference to be negative, the negative difference shall be accounted for before the issue of the GOs for RE-gas in the following month(s).

Corrections will not be available until the 10th working day of the following month, and any corrections will therefore not appear in the Register until the following month.

4.4 *Lifetime of a GO for RE-gas*

Any application of a GO for RE-gas shall take place within 12 months of the calendar month in which production took place. The Issuing Body automatically changes the status of issued GOs for RE-gas in the Register, which has not been used within this period. These are declared as expired, after which they cannot be transferred or cancelled.

4.5 *Transfer of GOs for RE-gas*

4.5.1 Transfer between Account Holders happens via self-service in the Register.

Any Account Holder with an active Account can transfer active GOs for RE-gas between them through the Register.

4.6 *Cancellation of GOs for RE-gas*

When a GO for RE-gas is registered as used, it must be cancelled. This is a process that the Account Holder initiates in the Register. The cancellation means that the GO for RE-gas can no longer be transferred but is only used as evidence of a consumption of a specified amount of gas by an end customer. The Register can form a document that the Account Holder can use as proof of cancellation of the GO for RE-gas.

4.6.1 *Special information regarding cancellation for export*

When a GOs for RE-gas are sold abroad, they are cancelled as exported at the border to either Germany or Sweden, regardless of the country in which the GOs for RE-gas are sold, south or east of the Danish border. The Issuing Body only verifies that the Biomethane has not been used for consumption by a end customer in Denmark based on a requirement for an auditor's declaration. The Issuing Body does not control and is not responsible for sale and use abroad.

4.6.2 *Cancellation of GOs for RE-gas to a Dena Account Holder in the DENA Certificate Register*

By cancelling a GO for RE-gas via "Ex-domain export" an Account Holder with an active Account in the Register can transfer active GOs for RE-gas through the Register to a Dena Account Holder in the DENA Certificate Register. Once a request for

"Ex-domain Export" has been confirmed by the Dena Account Holder in the DENA Certificate Register, the GO for RE-gas shall be transferred to the German Register. Therefore, the same GO for RE-gas cannot also be cancelled for consumption in Denmark.

The Issuing Body is entitled to reject a request for "Ex-domain Export" of GOs for RE-gas n between an Account Holder and a Dena Account Holder, if the Account Holder does not provide sufficient information with the request.

If the request contains sufficient information, the information shall be forwarded to DENA, which shall verify the information. DENA is entitled to reject the request, if the Account Holder specified by the Dena Account Holder:

- (1) has not been registered or is inactive in the DENA register;
- (2) rejects receipt of the GO for RE-gas.

Once DENA has confirmed to the Issuing Body that the request contains sufficient information, the cancellation of the listed GO('s) for RE-gas from the Account Holder in the Danish Register is carried out and transferred to the specified Dena Account Holder.

GOs for RE-gas transferred to a Dena Account Holder cannot be returned to an Account in Denmark after the cancellation has been completed.

A processing time of 14 Working days on "Ex-domain Export" received before 16:00 by the Issuing Body is sought - calculated from the time the Account Holder requests the cancellation in the Register. It should be noted that the Issuing Body and DENA reserve the right to a longer processing time.

4.6.3 *Cancellation from a DENA Account Holder in the DENA Certificate Register to an Account Holder in the Danish Register.*

An Account Holder in the DENA Register can transfer active GOs for RE-gas through the Register to an Account Holder with an active Account. Once an "Ex-Domain Export" request has been verified by the Account Holder, the transferred GOs for RE-gas cannot also be cancelled for consumption in Germany.

DENA is entitled to reject an "Ex-domain Export" request of GOs for RE-gas to the Register if the Account Holder does not provide sufficient information with the request.

If the request contains sufficient information, the information shall be forwarded to the Issuing Body, who shall verify the information. The Issuing Body are entitled to reject the request if:

- (1) The Dena Account Holder specified by the Account Holder has not been registered or is inactive in the Register;
- (2) the Dena Account Holder specified by the Account Holder refuses to receive the GOs for RE-gas;
- (3) The GOs for RE-gas come from an Upgrading Facility not located in Germany;
- (4) The lifespan of 12-month for the GO for RE-gas has been exceeded (German GOs for RE-gas are valid if the end date of production does not exceed 6 months from the start date of production).

Once the Issuing Body has confirmed to Dena that the request contains sufficient information, the transaction is completed by the listed GOs for RE-gas from the Dena Account Holder to the specified Account Holder.

A processing time of 14 Working days on "Ex-domain Export" received before 16:00 by the Issuing Body is sought - calculated from the time the request is confirmed by the Dena Account Holder (in the Dena Register). It should be noted that the Issuing Body and DENA reserve the right to a longer processing time.

5 Audit and supervision

Energinet may supervise Upgrading Facilities and cancellation of GOs for RE-gas by carrying out random checks on Account Holders, if necessary, as part of the supervisory obligation incumbent on the Issuing Body in The Executive Order No 1216 of 7 June 2021.

In order to ensure the necessary credibility of the GO scheme, the Issuing Body has composed an audit instruction applicable to all Account Holders who have been issued or transferred a GO for RE-gas during the previous calendar year (1 January to 31 December), see Annex 5. On this basis, the auditor must prepare a statement, which must be submitted to the Issuing Body by 1 July each year. If the auditor's statement is not delivered in a timely manner, the Account Holder's access

to the Register will be suspended, including the possibility of transferring and cancelling GOs for RE-gas.

Owners of the Upgrading Facilities who are issued GOs for RE-gas shall report annually to the Issuing Body on the type and weight of the Biomass used for the production of Biogas at the Upgrading Facility during the past year (the information shall be recorded continuously in a logbook for periodic checks). Reporting shall be made by 1 December at the latest. This information shall be provided in accordance with the information available for the period 1 August of the previous year to 31 July of the current year. Reporting shall be certified by the owner of the Upgrading Facility and shall contain an auditor's statement confirming the conditions of the biomass used and the production and supply of Biogas. The auditor's statement shall be endorsed by a state authorized or registered auditor. The Issuing Body has prepared an audit instruction for this purpose in accordance with Annex 6.

If the above deadlines for the submission of auditor's statement are not met, Energinet will close the Account of the Account Holder in question until Energinet receives a full auditor's statement.

6 Fees

Under Section 18 of the Executive Order, Energinet may charge a fee to cover the necessary costs associated with the establishment, issuance, import, export, and cancellation of a GO for RE-gas. Energinet may also charge fees to cover the necessary costs for the supervision of GOs for RE-gas. Fees shall be determined on the basis of fixed and variable costs arising directly from those tasks.

The aim is to ensure that necessary costs attributable to the tasks of establishing, issuing, transferring, and cancelling GOs for RE-gas and the tasks of supervising GOs for RE-gas are imposed on the applicant for the establishment, issue and transfer and cancellation of GOs for RE-gas.

It is intended that the fees will be determined based on a prior budget. It is intended that there will be an adjustment of the fees, at any difference, based on any hourly rate applicable at any time.

The fees are published on Energinet's website.

Based on Section 18 of the Executive Order, Energinet has fixed the fee as follows:

Creation fee:

Know-your-customer analysis
Manual entry of master/company information

Fixed annual payment to cover:

Servicing inquiries
Fixed payment to the Register and for the option of export
Recovery of auditor's statements
Supervision of GOs for RE-gas

Variable payment based on:

Issues
Exports to other registers
Imports from other registers

7 Right of appeal and punishment

In accordance with section 19 of The Executive order the decisions of the Issuing Body can be appealed to the Energy Board of Appeal.

The complaint must be lodged in writing within four weeks of notification of the decision.

Further paragraph 20 states, that unless liable to a more severe penalty under other legislation, a person is liable to a fine if he is providing incorrect information for the purposes of issue, transfer, cancellation and supervision of guarantees of origin or he fails to provide information on this, when he is obliged to provide such information under paragraph 14 (2).

Corporations, etc. (legal persons) may incur criminal liability under the provisions in Part 5 of the Danish Criminal Code.