

This document 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 gas from renewable energy sources

Version 2.0

1 March 2024

## Table of contents

PREFACE .....	3
1 INTRODUCTION .....	4
1.1 CANCELLED GUARANTEES OF ORIGIN CORRESPONDING TO RELEVANT GRID PROPERTIES .....	5
1.2 EFFECTIVE DATE .....	5
2 DEFINITIONS .....	6
2.1 DEFINITIONS USED .....	6
3 THE REGISTRY.....	9
3.1 REGISTRATION AS AN ACCOUNT HOLDER .....	9
3.2 REQUESTS FOR GUARANTEES OF ORIGIN AND LINKING UPGRADING FACILITIES TO THE ACCOUNT.....	10
3.3 UPDATING INFORMATION ABOUT THE ACCOUNT HOLDER AND UPGRADING FACILITY .	11
3.4 DEREGISTRATION OF AN UPGRADING FACILITY .....	11
3.5 ACCOUNT CLOSURE .....	12
3.6 THE REGISTRY .....	12
4 GUARANTEES OF ORIGIN .....	13
4.1 ISSUE OF GUARANTEES OF ORIGIN .....	13
4.2 CONDITIONS FOR THE ISSUE OF GUARANTEES OF ORIGIN FOR E-GAS.....	14
4.3 DOCUMENTATION FOR FULL OR PARTIAL RENUNCIATION OF FEED-IN SUBSIDIES FOR UPGRADED BIOGAS .....	15
4.4 ADJUSTMENT TO THE NUMBER OF GUARANTEES OF ORIGIN FOLLOWING CORRECTIONS .....	16
4.5 LIFETIME OF A GUARANTEE OF ORIGIN .....	16
4.6 TRANSFER OF GUARANTEES OF ORIGIN.....	16
4.7 CANCELLATION OF GUARANTEES OF ORIGIN .....	16
4.8 EXPORT AND IMPORT OF GUARANTEES OF ORIGIN .....	17
5 AUDITING AND SUPERVISION.....	19
6 FEES.....	20
7 APPEALS AND FINES .....	21

## Annexes

Annex 1: Request for registration as account holder

Annex 2: Agreement on guarantees of origin

Annex 3: Application form to open an account and issue guarantees of origin

Annex 4: Sworn statement on investment aid

Annex 5: Audit instructions for cancellation of gas guarantees of origin

The current versions of the annexes can be viewed on the issuing body's website.

## Preface

The Executive Order on guarantees of origin for electricity, gas and district heating and cooling from renewable energy sources<sup>1</sup> entered into force on 22 June 2023 and regulates guarantees of origin for gas from renewable energy sources (formerly biomethane certificates). The 'Guidelines for guarantees of origin for renewable gas, version 2.0' describe Energinet's administration of guarantees of origin for gas. Compared to the 'Guidelines for guarantees of origin for renewable gas, version 1.1', the Guidelines for guarantees of origin for renewable gas, version 2.0 and their annexes contain the following changes:

- Energinet can issue guarantees of origin for e-methane (e-gas) in accordance with Danish Executive Order no. 913 of 22 June 2023, with provisions on the conversion of electricity from generating facilities and thus criteria for the issue of guarantees of origin based on hydrogen production from electricity generated from renewable energy sources.
- Transfer options have been extended from only covering the German registry (DENA) to including transfers to and from other registries in the ERGaR scheme.
- Annex 5: Clarifications have been added to the audit instructions for cancellation of gas guarantees of origin, and the guidelines are described in more detail.
- Annex 6: Audit instructions for used biomass have been removed. Under the RE Directive, all facilities in Denmark are subject to sustainability certification requirements. The Danish Energy Agency has updated the Executive Order on sustainable biomass – Executive Order no. 1313 of 14 June 2021 – and the related handbook. Energinet deems the third-party verification of used biomass to be covered by the provisions implemented by the Danish Energy Agency.
- Clarifications to the procedure for full or partial renunciation of feed-in subsidies for up-graded biogas have been added.
- Clarifications and minor language changes have been made.

This update to the Guidelines for guarantees of origin for renewable gas, version 2.0, takes effect from 1 March 2024.

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<sup>1</sup> Executive Order no. 913 of 22 June 2023 on guarantees of origin for electricity, gas and district heating and cooling from renewable energy sources

## 1 Introduction

The Executive Order on guarantees of origin for electricity, gas and district heating and cooling from renewable energy sources entered into force on 22 June 2023 and regulates guarantees of origin for gas from renewable energy sources.

The guidelines for guarantees of origin for renewable gas describe how Energinet manages the issuance, transfer and cancellation of guarantees of origin for RE gas, and the requirements Energinet impose on participants in the market for guarantees of origin.

It follows from section 3 of the Executive Order on guarantees of origin that Energinet is the authority responsible for the issuance, transfer, cancellation and supervision of guarantees of origin for renewable gas covered by the Natural Gas Supply Act.

Energinet is responsible for managing guarantees of origin for renewable gas, including tasks related to the guarantee of origin system for renewable gas injected into the natural gas system, as Energinet has the relevant data for gas production.

Article 19(1)-(13) of the RE II Directive<sup>2</sup> contains rules on guarantees of origin for energy from renewable sources. The Directive has been implemented into Danish law by an act and associated executive order (see above), which forms the basis for Energinet's administration of the guarantee of origin scheme.

The purpose of guarantees of origin is to allow consumers to buy energy from renewable energy sources by purchasing documentation of origin in addition to their purchase of energy.

A guarantee of origin is an electronic document which primarily serves as evidence to the final customer that a given proportion or quantity of energy has been produced from renewable energy sources. A guarantee of origin thus serves as the

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<sup>2</sup> 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 sources (recast), link: <https://eur-lex.europa.eu/legal-content/DA/TXT/PDF/?uri=CELEX:32018L2001&from=LV>

necessary documentation for the purchased renewable energy, and also ensures that it has not already been sold to other consumers.

The guarantee of origin scheme is based on an electronic registry. No physical guarantees of origin are issued by the issuing body. The guarantee of origin scheme also allows for the transfer of guarantees of origin from one account holder to another account holder in another registry linked to the ERGaR scheme, and for RE gas to be declared at the border with Sweden or other European countries in the form of ex-domain cancellation.

#### 1.1 *Cancelled guarantees of origin corresponding to relevant grid properties*

The RE III Directive<sup>3</sup> contains additional rules awaiting specific implementation in Danish law. Energinet's e-gas guarantees of origin follow the provisions of the RE III Directive, such that when a customer consumes gas from a hydrogen or natural gas network, including gaseous renewable fuels of non-biological origin and bi-methane, as demonstrated in the commercial offer by the supplier, the Member States ensure that the cancelled guarantees of origin correspond to the relevant grid properties.

This means that when a customer consumes gas from a gas grid, the cancelled guarantees of origin must correspond to the relevant grid properties. This means cancelling gas guarantees of origin documenting the origin of the gas sold – even when, as in the case of e-gas, the renewable energy originates from green electricity, which is converted into green hydrogen and then into methane gas. This means that when consumers purchase gas from the Danish gas system, documentation will be provided by cancelling a gas guarantees of origin, including for the part converted via electrolysis. In such cases, e-gas guarantees of origin will be cancelled for the quantity of gas produced from RE electricity.

#### 1.2 *Effective date*

These Guidelines for guarantees of origin, version 2.0, are effective from 1 March 2024, and also replace the Guidelines for guarantees of origin, version 1.1.

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<sup>3</sup> DIRECTIVE (EU) 2023/2413 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 October 2023 amending Directive (EU) 2018/1999 and Directive 98/70/EC on the promotion of energy from renewable sources and repealing Council Directive (EU) 2015/652, link: [https://eur-lex.europa.eu/legal-content/DA/TXT/PDF/?uri=OJ:L\\_202302413](https://eur-lex.europa.eu/legal-content/DA/TXT/PDF/?uri=OJ:L_202302413)

## 2 Definitions

### 2.1 *Definitions used*

Except where the context dictates otherwise, the words listed in this section 2 have the meanings stated below in the Guidelines for guarantees of origin. This applies regardless of whether the words are used in the singular or plural form and in the definite or indefinite form, unless the context dictates otherwise.

**Cancellation** is made by the account holder when they have sold guarantees of origin to a consumer or for export. Cancellation will result in the guarantees of origin being removed from the account holder's account.

**Working Day** means any day from Monday to Friday, excluding public holidays and closing days, as stated in the issuing body's calendar, available at [www.energinet.dk](http://www.energinet.dk).

**B-gas** is biogas that has been upgraded to meet the quality requirements for natural gas in Denmark and added to the Danish gas system.

**Biogas** is gas produced by anaerobic fermentation of organic materials, e.g. from slurry, sludge from waste water treatment plants, energy crops or organic waste, thereby forming a gas where methane and CO<sub>2</sub> are the main components.

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

**Account** is an electronic account of guarantees of origin.

**Account Holder** is any physical or legal person registered in the registry who can act in accordance with the Rules for guarantees of origin.

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

**Disclosure** – the EU requires all suppliers of gas customers to guarantee, by means of gas guarantees of origin, that the necessary number of gas guarantees of origin have been purchased for the gas stated in the declaration.

**ERGaR** is the abbreviation for the European Renewable Gas Registry, a joint initiative between established national gas registries in Europe to enable transparent cross-border transfer of RE gas guarantees of origin between registries.

**ERGaR CoO Scheme Rules** are the current guidelines for the export and import of guarantees of origin and certificates between member countries in the ERGaR scheme.

**E-gas** is gas produced via electrolysis using renewable electricity.

**ERGaR Export** means cancelling guarantees of origin in one country's registry and transferring them to another country's registry.

**Ex-domain Cancellation** means cancellations made in one country's registry for use in another country, but without transfer of the guarantees of origin to the other country's registry. Ex-domain cancellation cannot be made to countries linked to an automated transfer method.

**G-REX Account Holder User Manual** is Grexel's user manual for the G-Rex registry. The manual can be downloaded from G-REX.

**GSRN** (Global Service Relation Number) is the number which each metering point for feed-in subsidy must have for the purpose of identifying the metering point.

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

**Account Holder** is any physical or legal person registered in the Danish registry for guarantees of origin (G-rax), or another European registry that is a member of the ERGaR scheme.

**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 Feed-in Subsidy** is the point at which the energy and quality of biomethane is measured, forming the basis for the payment of the feed-in subsidy under section 35c of the Natural Gas Supply Act and the issuance of guarantees of origin. The metering point for feed-in subsidy 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 which connects the upgrading facility to the Danish gas system. The grid owner can be a distribution company or the transmission company (Energinet).

**Upgrading Facility** is the facility for upgrading biogas to RE gas.

**Upgrading Facility Owner** is the physical or legal person who owns the upgrading facility.

**Guarantee of origin** is an electronic certificate documenting 1 MWh of RE gas.

**Guarantee of Origin Agreement** is an agreement between the issuing body and the account holder, setting out the conditions that natural or legal persons must meet to act as account holders in the registry.

**Feed-in Subsidy** is the subsidy paid by the Danish Energy Agency to the upgrading facility owner based on the Danish Natural Gas Supply Act.

**Registry** – an electronic system used to register, issue, transfer and cancel guarantees of origin.

**Guidelines for Guarantees of Origin** are these guidelines, including annexes (the latest version).

**Issuing Body** – Energinet issues guarantees of origin based on measurements performed by the grid owner at the metering point for feed-in subsidy. These are issued via the registry operated by Energinet, which contains several other functions, such as the option to transfer guarantees of origin.

**RE Gas** is biogas or other gas from renewable energy sources that has been upgraded to meet the quality requirements for natural gas in Denmark and added to the Danish gas system.



### **3 The registry**

#### **3.1 *Registration as an account holder***

To act as an account holder in the registry, the account holder must be registered.

Registration in the registry is based on the following criteria:

- A. These companies are generally admitted without further documentation:
  - Biogas producers and upgrading facility owners who have a signed connection agreement with Evida or Energinet,
  - Biomethane sellers, gas suppliers or shippers in the Danish gas market, or
  - Companies known and recommended by other European registries.
  
- B. The issuing body assesses applicants who do not fall into the above categories based on 'know-your-customer' criteria, and may require additional documentation, e.g. to confirm a company's financial health.

Applications for registration as an account holder in the registry must be made by completing Annex 1 and emailing it to the issuing body at [gascertifikat@energinet.dk](mailto:gascertifikat@energinet.dk). The application must specify whether the account holder wishes to handle guarantees of origin for e-gas, as a separate account is required in the registry for this purpose.

The following information about the account holder must be provided:

- Name, address, postcode, town and country
- CVR number
- Contact details (name, telephone number and email address of contact)
- User and person responsible for managing the account holder's account in the IT system.

If the requirements for registration in the registry are met, the issuing body draws up a guarantee of origin agreement (see Annex 2) based on the information contained in the application or registers the upgrading facility upon receipt of the signed application from the upgrading facility owner.

The signed agreement or application form is emailed in PDF format to [gascertifikat@energinet.dk](mailto:gascertifikat@energinet.dk). The documents must be received by the issuing body at least five working days before the end of a month for the account holder to be registered in the registry for the following month.

If all the above information has been provided adequately, the issuing body will complete the registration within five working days, and the account holder will receive their log-in information for the registry.

### 3.2 *Requests for guarantees of origin and linking upgrading facilities to the account*

All upgrading facility owners that supply gas to the Danish gas system are entitled to have an account created and their upgrading facility linked to this account. The application to have an account created and linked to the upgrading facility is made by filling in an application form (Annex 3) and emailing it in PDF format to [gascertifikat@energinet.dk](mailto: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 into the Danish gas system.

The following information on the upgrading facility must be provided in connection with the application:

- Address, postcode, city, country and CVR number of the upgrading facility
- The upgrading facility's capacity in kWh/year (from the connection agreement with the grid owner)
- Whether the upgrading facility receives production aid and/or investment aid
- Whether the upgrading facility has received investment aid (sworn statement (Annex 4))
- The start-up date of the upgrading facility
- The type of the upgrading facility:
  - Unspecified
  - Based on landfill gas
  - Based on wastewater
  - Based on agricultural gas
  - Based on organic waste
  - Based on process/industrial waste
- GSRN in metering point for feed-in subsidy

If the upgrading facility uses electrolysis as part of the gas production, two or more secondary meters must be installed, depending on the specific design of the plant. The secondary meter(s) must be installed to distinguish between the share of gas production produced by the expansion at the e-methane plant and the existing plant. To issue guarantees of origin for e-gas, the upgrading facility owner must apply for a separate account linked to the facility. The application to have a separate account created and linked to the upgrading facility is made by filling in an application form (Annex 3) and emailing it in PDF format to [gascertifikat@energinet.dk](mailto:gascertifikat@energinet.dk). When requesting the issue of guarantees of origin for e-gas, the upgrading facility must also provide the following information:

- GSRN for electricity consumption at the e-methane plant
- Provide third-party access via EIOverblik to the issuing body as described on Energinet's website: <https://energinet.dk/el/elmarkedet/sadan-bliver-du-tredjepart/>

An upgrading facility linked to an account must not trade the origin value of the RE gas produced in any other way.

### 3.3 *Updating information about the account holder and upgrading facility*

The account holder is obliged to update information about the account holder. The same applies to upgrading facilities linked to an account holder's account. Account holders must notify the issuing body of any changes to be made in the registry for the following month at least five working days before the end of the month.

The registry update takes effect on the first day of the following month.

### 3.4 *Deregistration of an upgrading facility*

If an upgrading facility is no longer to be linked to an account, it is the responsibility of the relevant account holder to email a written notification to the issuing body at [gascertifikat@energinet.dk](mailto:gascertifikat@energinet.dk). The upgrading facility must be deregistered before the end of the given month, and the issuing body changes the registry based on the notification.

### 3.5 *Account closure*

The issuing body may close an account in the event of a breach of the guarantee of origin agreement. A breach could be that the account holder fails to submit an auditor's statement within the time limit or to update their information in the registry.

An account holder may close their account at any time, giving 10 working days' notice. Before the account is closed, all active guarantees of origin must either be transferred to another account holder or cancelled.

When the account no longer contains active guarantees of origin, it will be deactivated. The closed account will not be deleted in order to preserve the guarantees of origin history.

### 3.6 *The registry*

Guarantees of origin are issued via the electronic registry chosen by the issuing body. The account holder bears their own costs of maintaining access to the registry. The account holder is responsible for having a compatible IT system and adequate IT security to access and use the registry.

The issuing body is entitled to restrict or prevent the account holder's access to the registry if it is misused or the account holder breaches their obligations under the guarantee of origin agreement or the Guidelines for guarantees of origin for renewable gas.

The registry uptime can be expected to be 99.5% on a yearly basis, excluding planned downtime. The issuing body will strive to give account holders appropriate notice of planned downtime. The issuing body reserves the right to take the registry offline without notice in the event of critical system updates or the like.

## **4 Guarantees of origin**

### *4.1 Issue of guarantees of origin*

Only account holders with an active account linked to an upgrading facility can be issued with guarantees of origin. They are issued automatically each month to all account holders with linked upgrading facilities, without any prior request other than the signed application form (Annex 3).

Guarantees of origin are issued by the issuing body each month and with a standard size of 1 MWh. They are normally issued based on measurements from the grid owner in the metering point for feed-in subsidy at the end of the month. These guarantees of origin are referred to as guarantees of origin for b-gas.

Guarantees of origin based on electrolysis as part of the gas production are issued based on secondary meter readings, which the company reports to the Danish Energy Agency portal each month. Energinet issues e-gas guarantees of origin based on the measurements reported to the Danish Energy Agency.

If other gas is added, including propane, to change the calorific value of the gas, this added energy must be measured by the grid owner in the metering point for biomethane.

If the production in a month does not correspond to 1 MWh, a guarantee of origin will be issued for the month in which the production corresponds to 1 MW, or a correction may be used if necessary (see section 4.4).

The date of issue for guarantees of origin and when new guarantees of origin are assigned to an account is the 10th working day after the last day of the month of production.

The registry contains the following information for each guarantee of origin:

- RE gas type (b-gas or e-gas)
- CVR number of the upgrading facility
- Physical and legal location of the upgrading facility
- 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 feed-in subsidy
- Whether production aid in the form of feed-in subsidies has been granted under section 35 c of the Danish Natural Gas Supply Act
- Whether investment aid has been granted to the upgrading facility
- Issuing body
- Date of issue
- Country of issue
- Identification number of the guarantee of origin
- Unit of the guarantee of origin (1 MWh)
- Production period for the RE gas
- Expiry date (12 months after the last day of the production period).

#### 4.2 *Conditions for the issue of guarantees of origin for e-gas*

If the upgrading facility owner requests that guarantees of origin be issued for production based on conversion from electricity, guarantees of origin will be issued for e-gas. In these cases the issuing body must be able to verify that the electricity used for production has been generated using renewable energy. Guarantees of origin corresponding to at least 100% of the electricity consumption must be cancelled for this purpose and submitted as documentation to the issuing body.

The cancelled electricity guarantees of origin must meet the following requirements:

- The power comes from renewable sources such as wind, solar or biomass.
- Documentation in the form of guarantees of origin for electricity has been issued in the same bidding zone or in a neighbouring bidding zone to the electrolysis plant producing the e-gas.
- Guarantees of origin have been issued no later than three months before the hydrogen production takes place, i.e. they may not be more than three months old from the date of issue.

Access to cancel guarantees of origin must be sent to the issuing body in the form of a link, so the above criteria can be checked.

The cancellation of guarantees of origin must also contain the following information:

- Name of the e-methane facility
- Type of receiver: conversion facility
- Consumption category: conversion issue

#### 4.3 *Documentation for full or partial renunciation of feed-in subsidies for upgraded biogas*

Guarantees of origin are normally issued based on the volume of upgraded biogas receiving a feed-in subsidy. Biogas will therefore normally have received production aid and have been registered as such. However, the upgrading facility owner may renounce the subsidy in whole or in part with the Danish Energy Agency.

If guarantees of origin are sought which declare that the gas has not received any feed-in subsidy under the executive order, the upgrading facility owner is responsible for sending the information about the subsidy renunciation to the issuing body so that guarantees of origin can be issued that document production without feed-in subsidy.

The issuing body initiates the issue of guarantees of origin with documented full or partial renunciation of feed-in subsidies following final approval by the Danish Energy Agency that no price feed-in subsidies have been granted for a specified volume and in a given period.

In practice, documentation of final approval can be emailed to Energinet by adding [gascertifikat@energinet.dk](mailto:gascertifikat@energinet.dk) as a cc recipient on correspondence to the Danish Energy Agency about renouncing the subsidy.

The Danish Energy Agency has a public document on its website covering the full or partial renunciation of the subsidy:

[https://ens.dk/sites/ens.dk/files/Bioenergi/hel\\_eller\\_delvis\\_frasigelse\\_af\\_stoette\\_til\\_opgraderet\\_biogas.pdf](https://ens.dk/sites/ens.dk/files/Bioenergi/hel_eller_delvis_frasigelse_af_stoette_til_opgraderet_biogas.pdf)

Once the issuing body receives documentation to this effect from the Danish Energy Agency, Energinet can issue guarantees of origin to the given upgrading facility for the given volume in the given period, noting that the facility has not received production aid.

The registration will also specify whether a facility has received other forms of aid, such as investment aid.

Irrespective of the type of aid, documentation must be provided prior to the issue of the guarantees of origin if the registration is required to specify that no aid has been granted to the facility.

#### 4.4 *Adjustment to the number of guarantees of origin following corrections*

The issuing body regularly receives updated/corrected meter data from the grid owner. The number of issued guarantees of origin is adjusted monthly in arrears based on the corrected meter data from the grid owner. Corrections are made each quarter for the previous three full months. No further corrections are made for the given period unless the issuing body deems that special circumstances apply.

Where a correction is made, the difference that existed following the issue of guarantees of origin at the end of the month is increased or decreased. The difference is increased or decreased in line with the correction. If the correction results in the difference becoming negative, this will be taken into account when guarantees of origin are issued in the subsequent month(s).

Corrections will not be available until the 10th working day of the following month. Any corrections will therefore not appear in the registry until the following month.

#### 4.5 *Lifetime of a guarantee of origin*

Any application of a guarantee of origin must take place within 12 months of the calendar month in which production took place. The issuing body automatically changes the status of issued guarantees of origin in the registry that have not been used within this period. These are marked as expired, after which they cannot be transferred or cancelled.

#### 4.6 *Transfer of guarantees of origin*

##### 4.6.1 Transfers between account holders are done via self-service in the registry.

Any account holder with an active account may transfer active guarantees of origin to another account holder via the register.

#### 4.7 *Cancellation of guarantees of origin*

When a guarantee of origin is registered as having been used, it must be cancelled. This is a process that the account holder initiates in the registry. Following cancellation, the guarantee of origin can no longer be transferred, but only used as



evidence of the consumption of a specified volume of gas by an end-customer. The registry can generate a cancellation confirmation document which the account holder can use as proof of the cancellation of guarantees of origin.

#### 4.7.1 Cancellation of guarantees of origin at the border (ex-domain)

When a guarantee of origin is sold abroad, it is cancelled as having been exported at the border to either Europe or Sweden, irrespective of which country the guarantee of origin is sold to south or east of the Danish border. The issuing body only verifies that the RE gas has not been used for consumption by an end-customer in Denmark, based on the audit declaration requirement. For this type of ex-domain cancellation, the issuing body does not monitor and is not responsible for the sale and use abroad. The guarantees of origin are not transferred to another registry.

#### 4.8 *Export and import of guarantees of origin*

Guarantees of origin are exported and imported via ERGaR's hub for transactions between registries in the ERGaR scheme. The process is partly automated. An account holder may request transfer to another registry connected to ERGaR's hub. The request is made by the account holder online in the Danish registry.

The transaction takes place in line with the current ERGaR CoO Scheme Rules, which can be downloaded from the ERGaR website: <https://www.ergar.org/public-download/>

##### 4.8.1 Export

An account holder with an active account in the Danish registry can transfer active guarantees of origin via an 'ERGaR export' to other registries that are members of ERGaR.

The issuing body is entitled to reject a request for ERGaR export of guarantees of origin if the account holder fails to provide adequate information in connection with the request.

If the request contains adequate information, the information is sent via the ERGaR hub to the recipient's registry, which checks the information. The recipient's registry is entitled to reject the request if the recipient designated by the account holder:

- (1) has not been created or is inactive in the given registry, or
- (2) refuses to accept the guarantees of origin.

Once the recipient has confirmed to the issuing body that the request contains adequate information, the given guarantee(s) of origin are transferred from the account holder in the Danish registry to the designated recipient in the given registry. The guarantees of origin are cancelled in the Danish registry upon transfer.

Guarantees of origin transferred to a recipient's registry cannot be transferred back to an account in Denmark once they have been cancelled in the Danish registry.

Guarantees of origin to be exported must have a minimum residual lifetime of two months in the Danish registry, as unforeseen delays can occur during the partly automated transfer of guarantees of origin from one registry to another.

The aim is to process ERGaR exports received by the issuing body before 16.00 within 10 working days, calculated from the time when the account holder requests cancellation in the registry. However, the issuing body and the recipient's registry reserve the right to require a longer processing time. The account holder will be notified if the processing time exceeds 10 working days.

#### 4.8.2 Import and recognition of guarantees of origin from other countries

The issuing body allows imports from other issuing bodies that have been assigned this role in a given country and that issue guarantees of origin in line with Article 19 of the RE Directive.

## **5 Auditing and supervision**

Energinet can monitor upgrading facilities and cancellations of guarantees of origin by carrying out, where necessary, random checks at account holders, as part of the issuing body's supervisory obligation under Executive Order no. 913 of 22 June 2023.

To ensure that the guarantee of origin scheme maintains the necessary credibility, the issuing body has prepared audit instructions that apply to all account holders to whom guarantees of origin have been issued or transferred during the previous calendar year (1 January - 31 December), see Annex 5. Based on these, the auditor must prepare a declaration to be submitted to the issuing body no later than 1 July each year. If the auditor's declaration is not submitted on time, the account holder's access to the registry will be suspended, including the ability to transfer and cancel guarantees of origin.

Account holders who have not held guarantees of origin in their accounts during the previous calendar year are exempt from the requirement to submit an auditor's declaration and are instead required to submit a management declaration stating that they have not sold guarantees of origin and have thus not had any activity in their account with the registry.

If the above deadlines for submitting an auditor's or management declaration are not met, Energinet will close the account holder's account until Energinet receives an adequate auditor's/management declaration.

## 6 Fees

Under section 23 of the Executive Order, Energinet may charge fees to cover the necessary costs in connection with the creation, issuance, import, export and cancellation of guarantees of origin. Energinet may also charge fees to cover the necessary costs related to supervision of guarantees of origin. Fees must be set based on the fixed and variable costs directly associated with the given tasks.

The aim is to ensure that the necessary costs attributable to the tasks of creating, issuing, transferring and cancelling guarantees of origin and the tasks of supervising guarantees of origin are borne by the party that requests the creation, issuance, transfer or cancellation of guarantees of origin.

The intention is that fees will be set based on a prior budget. The intention is also that fees will be adjusted in the event of any difference, based on the current hourly rate.

The fees are published on Energinet's website and are collected quarterly.

Energinet has set the fee as follows based on section 23 of the Executive Order:

### **Account creation fee:**

Know-your-customer analysis

Manual entry of master data/company information

### **Fixed payment to cover:**

Servicing of enquiries

Fixed payment for the registry and for the export option

Collection of auditors' declarations

Supervision of guarantees of origin

### **Variable payment based on:**

Issuances

Export to other registries

Import from other registries

## **7 Appeals and fines**

Decisions by the issuing body regarding the production of gas can be appealed to the Energy Board of Appeal under section 24 of Executive Order no. 913 of 22 June 2023 on guarantees of origin for electricity, gas and district heating and cooling from renewable energy sources.

The appeal must be lodged in writing within four weeks of the decision being notified.

It also follows from section 25 that unless a more severe penalty is stipulated in other legislation, any person who provides incorrect information for use in connection with the issuance, transfer, cancellation and supervision of guarantees of origin or who fails to provide information about these which they are obligated to provide under section 14(2) is punishable by a fine.

Criminal liability may be incurred by companies etc. (legal persons) pursuant to the rules in Part 5 of the Danish Criminal Code.