

Appendix 5:

Audit instruction in relation to guarantees of origin (GOs) for renewable gas

Energinet has overview of the entire process from issuing GOs and adding them to accounts of owners of the production facilities over transfers and trades of GOs within the GO platform to ordered cancellations by account holders based on their sales of RE-gas to end users. The only part of the value chain from production to end user that Energinet does not have access to is reconciling cancellations to sold amounts of RE-gas for the individual account holder.

Energinet has authored this instruction applicable to all trading account holders in the Danish register for RE-gas (GO-register) during the previous calendar year (1 January to 31 December). The basis for the scheme can be found in The Executive Order No 913 on guarantees of origin for electricity, gas, district heating and cooling from renewable energy sources as of 22 June 2023 and regulates guarantees of origin from renewable energy sources – GOs for RE-gas.

To ensure trust in the system, Energinet requires each GO account holder to comply with one of the options mentioned below:

Management statement in case of no activity on the account or no sales to Danish consumers

Send a management statement stating that either:

- in the past reporting year the account holder has not had GOs on their account
- can state that no GOs have been sold to Danish consumers.

The management statement must be signed by those with power of attorney with the account holding company.

How and when:

Please submit the statement to Energinet at gascertifikat@energinet.dk no later than 1 July every year.

The statement must be accompanied by documentation that the signatory is in fact the authorized officer of the company. This could, for example, be an extract from the national business register.

Auditor assurance report in case of sales to Danish consumers

Obtain external assurance from an auditor that reconciliation of cancellations of GOs to sold amounts of RE-gas has been done by an external party and that there is balance.

The requirements are specified in § 1 to § 7 below. The requirement is for reasonable assurance in accordance with the International Standard for Assurance Engagements 3000 (ISAE 3000) issued by the International Auditing and Assurance Board (IAASB). The auditor will must be a chartered accountant with an authorization applicable in the home country of the accountholder and / or in Denmark.

The purpose of this statement is to describe the scope of the auditor's work, as well as to describe the work to be carried out by the auditor as part of the provision of reasonable assurance. The review shall be carried out to support Energinet in ensuring that the information provided by the account holder to the GO register is correct and to ensure that the account holder's account containing GOs for RE-gas is accurate.

§ 1. The assurance engagement must be carried out by an accountant holding an authorisation either in the home country of the account holder or in Denmark.

§ 2. The assurance process is carried out in accordance with this instruction, international assurance standards and additional requirements under Danish legislation. The requirement is for high assurance in accordance with the International Standard for Assurance Engagements 3000 (ISAE 3000) issued by the International Auditing and Assurance Board (IAASB).

§ 3. As the result of the assurance engagement, the auditor shall provide an opinion whether:

1. The GO-register account holder for the past reporting year has cancelled GOs in the registry in an amount equal to the amount of RE-gas sold to Danish consumers.
2. The GO-register account holder maintains a formalized procedure for handling GOs in accordance with the requirements stated in Guidelines for GOs for gas from renewable energy sources.

§ 4. The account holder shall provide the auditor with the information which must be considered relevant to the assessment. The account holder shall allow the auditor to carry out any inquiries the auditor deems necessary and shall ensure that the auditor receives the information and assistance which the auditor deems necessary for the performance of the duties.

§ 5. The assurance report must be submitted to Energinet at gascertifikat@energinet.dk no later than 1 July every year.

§ 6. If Energinet does not receive the assurance report in a timely manner, or if on the basis of the auditor's statement, Energinet cannot obtain sufficient assurance that the account holder can account for the holdings, as well as the ongoing development of GOs (addition and departure), Energinet has the power that follow from the Guidelines for guarantees of origin for gas from renewable energy sources.

§ 7. This audit instruction takes effect on 1 March 2024.