



# **EECS Electricity Domain Protocol**

# for **Finland**

Prepared by Finextra Oy Based on EECS Rules Release 7.9

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# **A** Introduction

The framework specified in the EECS Rules and the detailed procedures and conditions specified in this Domain Protocol have the main objective of ensuring robustness and transparency in the facilitation of EECS Schemes for all EECS Participants.

A Domain Protocol promotes quality and clarity, as it:

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

Important contact information is provided in Annex 1.





### **B** General

#### B.1 Scope

- 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 Electricity Scheme as defined in the EECS Rules
- B.1.2. Production Device qualification for this Domain will be determined by connection to the electricity system of Finland such that, in electrical terms, the Production Device is effectively located in Finland.
- B.1.3. Finextra is authorised to Issue EECS Certificates relating to the following EECS Product(s):
  - EECS-GO
  - ICS (Ekoenergy)

# **B.2** Status and Interpretation

- B.2.1. The EECS Rules are subsidiary and supplementary to national legislation.
- B.2.2. 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 C5 of this document.
- B.2.3. The capitalised terms used in this Domain Protocol shall have the meanings ascribed to them in the EECS Rules except as stated in section C5 of this document.
- B.2.4. This Domain Protocol is made contractually binding between an EECS Participant and Finextra by agreement in the form of the Standard Terms and Conditions.
- B.2.5. In the event of a dispute, the approved English version of this Domain Protocol will take precedence over a local language version.

#### B.3 Roles and Responsibilities

B.3.1. Authorised Issuing Body and Registry Operator

Finextra is responsible for issuing EECS Certificates and operating the EECS scheme in Finland. Finextra acts also as the Registry Operator for the domain Finland including Åland. The registry can be found at: <a href="https://go.finextra.fi">https://go.finextra.fi</a>.

### Tariff of IB:

http://www.fingrid.fi/en/customers/garanteesoforigin/service2015/Pages/default.aspx

#### B.3.2. Competent Authority

According to the Act on Verification and Notification of Origin of Electricity (1129/2003) and as amended by 445/2013, Fingrid Oyj (TSO, Transmission System Operator in Finland) is the appointed Competent Authority of the Guarantee of Origin (GO) system in Finland. The Competent Authority may assign this task to its totally owned subsidiary. Fingrid Oyj has assigned the task to its totally owned subsidiary Finextra Oy (hereinafter Finextra).

B.3.3. Authorised Measurement Bodies





Relevant Transmission or Distribution System Operators act as measurement bodies in the Finnish EECS scheme. A Measurement Body is an organisation responsible for the collection of metering data relating to the output of the Production Device (PD).

#### B.3.4. Production Registrar

Production Registrars verify Production Device data as part of the registration process when deemed necessary by the Issuing Body. Production Registrars are on-site auditors nominated by Energy Authority, and Finextra.

Contact details for the principle roles and Issuing Body agents are given in Annex 1.

# B.3.5. Production Auditor

Production Auditors (verifiers) verify production declarations and (where appropriate) consumption declarations made by registrants of Production Devices when deemed necessary by the Issuing Body. Production Auditors should be independent from the owners of the Production Devices.

#### B.3.6. Scheme Participant

Scheme participant is an Account Holder (AH) or a Registrant of a Production Device on the EECS registration database.

# B.3.7. Valid EECS Products: Independent Criteria Scheme Combinations

The following are valid EECS products: Independent Criteria Scheme combinations which can be issued under this Domain Protocol:

EECS Product	Independent Criteria Scheme
EECS GO	ICS: EKOEnergy

Product Rules on Ekoenergy can be found on <a href="http://www.ekoenergy.org/?lang=en">http://www.ekoenergy.org/?lang=en</a>





# C Overview of National Legal and Regulatory Framework

#### C.1 The EECS Framework

C.1.1. For the Finnish Domain, the relevant local enabling legislation is as follows:

Issuing of Guarantees of Origin for electricity production from renewable energy sources and high-efficient cogeneration (Combined Heat and Power, CHP) as well as electricity disclosure in Finland is implemented in the law

By the Act on Verification and Notification of Origin of Electricity (1129/2003) and as amended by 445/2013 (Laki sähkön alkuperän varmentamisesta ja ilmoittamisesta, <a href="www.finlex.fi">www.finlex.fi</a>, in Finnish, unofficial translation: <a href="http://www.fingrid.fi/en/customers/qaranteesoforigin/legislation/Pages/default.aspx">http://www.fingrid.fi/en/customers/qaranteesoforigin/legislation/Pages/default.aspx</a>)

and in secondary legislation, by

• The Governmental Decree on notification of origin of electricity (417/2013), Valtioneuvoston asetus sähkön alkuperän varmentamisesta, www.finlex.fi (in Finnish, unofficial translation <a href="http://www.fingrid.fi/en/customers/qaranteesoforigin/legislation/Pages/default.aspx">http://www.fingrid.fi/en/customers/qaranteesoforigin/legislation/Pages/default.aspx</a>). This Act and Decree transpose Article 15 of 2009/28/EC (RES-E Directive), Article 3, Paragraph 9 of 2009/72/EC (Internal Electricity Market Directive) and 2012/27/EC (Energy Efficiency Directive).

#### The main items are following:

- The information content of RES and CHP GOs are according to Directives 2009/28/EC and 2012/27/EC.
- Finland must recognize Guarantees of Origin for RES and CHP from other EU and EEA countries unless it has severe doubts about the accuracy, reliability or veracity of the Guarantee of Origin.
- Guarantees of Origin are issued for net generation of electricity from renewable energy sources or using high-efficient cogeneration. Guarantees of Origin are issued for monthly production. Guarantee of Origin may be used within 12 months from the end of the related production period. Each GO must have a unique identification code.
- Fingrid Oyj or its fully owned subsidiary is responsible for maintaining an
  electronic register for the Guarantees of Origin. The Registry Operator issues,
  transfers, cancels and expires GOs in a non-discriminatory way. The Registry
  Operator must at its own initiative expire any Guarantee or Origin within in its
  registry if more than 12 months have passed from the end date of the related
  production period.
- The administering of the Guarantees of Origin is a public service obligation, which is subject to acts pertaining to authorities, such as the Administrative Procedure Act. The performance of the relevant duties is supervised by the Energy Authority (Energiavirasto, www.energiavirasto.fi).
- The service fees can cover moderate costs of registry operator's administrative duties. The service model needs also to take into account small-scale producers' possibility to join the registry.
- The task of the Energy Authority is to monitor compliance with law. The
  Energy Authority monitors compliance with the obligation of disclosure of
  electricity mix, and monitors the operations of verifiers and the Registry
  Operator. The Energy Authority approves verifiers according to the Origin





Guarantee act. In order to implement monitoring, the Energy Authority is entitled to obtain information from power plant owners, the registry operator, verifiers and electricity suppliers.

- Electricity suppliers must use a Guarantee of Origin to verify a renewable origin of sold electricity except when disclosing the renewable share in the residual mix. Same rules apply for electricity consumers.
- The residual mix is used to give origin to electricity from unknown origin and in a manner that prevents double counting of renewable energy sources.
- Verification of Production Device information can be made by on-site auditing, EECS System or through the verification to the Production Subsidy for Electricity Produced from Renewable Energy Sources (Finnish Feed-in Tariff system, FIT). The verification is valid for 5 years.
- C.1.2. Evidence that the Authorised Issuing Body (Member) has been properly nominated as a Competent Authority or has been properly appointed to issue Certificates for an ICS

Finextra is nominated as the issuing body of RES and cogeneration GOs in Finland according to the Act on Verification and Notification of Origin of Electricity (1129/2003) and as amended by 445/2013.

Finextra is appointed to issue ICS: Ekoenergy by appointment letter from Finnish Association for Nature Conservation.

#### C.2 National Electricity Source Disclosure

# C.2.1. Legislation and regulation

The legislation regarding electricity disclosure implementing Article 3 of 2009/72/EC (Internal Electricity Market Directive) is included in the legislation for issuing Guarantees of Origin.

# C.2.2. Summary of the disclosure methodology and process

- Electricity suppliers are required to disclose in bills and promotional materials
  to their end customers the contribution of each energy source in the sold
  electricity, at least at the accuracy of separation between renewable, nuclear
  and fossil sources. Electricity suppliers must also disclose in bills and
  promotional materials a reference to public data sources which disclose the
  content of CO2 (g/kWh) and radioactive waste (mg/kWh) in the sold electricity.
- The residual mix is used to give origin to electricity from unknown origin. The
  national residual mix is calculated by the Energy Authority of Finland. The
  residual mix needs to be calculated in a manner that prevents double counting
  of renewable energy sources.
- The Energy Authority of Finland is responsible for the supervision of disclosure information.

### C.3 National Public Support Schemes

Major support scheme is defined by the Finnish Act (1396/2010). The act enables premium feed-in tariff (FIT) for wind energy, biogas and small-scale CHP from wood energy (Laki uusiutuvilla energialähteillä tuotetun sähkön tuotantotuesta, <a href="www.finlex.fi">www.finlex.fi</a>, in Finnish). General information about feed-in-tariffs for renewables is published by Ministry of Employment and the Economy at <a href="http://www.tem.fi/en/energy/renewable\_energy\_sources/feed-in\_tariff\_of\_renewable





Investment support is based on the assessment of the project in question by the Ministry of Employment and the Economy. The Ministry can grant energy support for climate and environment investments and surveys that promote e.g. the production or use of renewable energy (<a href="http://www.tem.fi/en/energy/energy\_support">http://www.tem.fi/en/energy/energy\_support</a>).

No relation exists between renewable energy support and electricity disclosure. FIT is the financial support and GO is the proof of ownership of generation attributes. The legislation does not set any restrictions for issuing and cancelling Guarantees of Origin from supported electricity generation.

# C.4 **EECS Product Rules**

The EECS Product Rules as applied in Finland are set out within sections D and E of this document.

#### C.5 Local Deviations from the EECS Rules

Due to timelines related to closing of national balance settlement, issuing of EECS Certificates is possible at the earliest 5<sup>th</sup> of the month after the month following the month of production. This is not in line with C3.4.1 of the EECS Rules, but necessary in order to link correction procedures to the correction procedures of the balance settlement.

In addition of issuing on monthly basis, GOs can also be issued either quarterly or per the half year's period according to Account Holder's preference. The GOs shall be however issued separately for each month of the period.

Data will be stored for 6 years based in financial reporting requirements according to Finnish legislation. This is a deviation from EECS Rules D.8.1.2





# **D** Registration

# D.1 Registration of participants

# D.1.1. Applications

- 1. 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. An application to become an Account Holder is done by filling out and signing two copies of the Standard Terms and Conditions form (all forms available on <a href="http://www.fingrid.fi/EN/CUSTOMERS/QARANTEESOFORIGIN/JOINING/Pages/default.aspx">http://www.fingrid.fi/EN/CUSTOMERS/QARANTEESOFORIGIN/JOINING/Pages/default.aspx</a>) and sending those to Finextra. The required attachments of the Standard Terms and Conditions include:
  - a. Contact Information Sheet
  - A certified trade registry extract or similar official document stating that the organization is validly existing and founded under the laws of the mother country.
  - c. Name and address of the organization
  - d. Business Identification (ID) of the organization
  - e. Names of authorized signatories (the Standard Terms and Conditions should be signed by this/these Signatory/Signatories).
  - f. Copy of the passport of the Authorized Person.
  - g. If the applicant is not a known, old customer and registered electricity producer and/or supplier located in Finland, Sweden or Norway, he must also fill in and attach a Know-Your-Customer questionnaire prepared by the AIB (Annex 2). The purpose of this document is to protect the EECS markets from Value Added Tax (VAT) frauds.
- 2. After receiving all documentation of the applicant, Finextra evaluates whether the application can be accepted. Reasons for rejection may be
  - a. Required documents are missing or not properly filled
  - b. Finextra has doubts about the aims of the applicant
  - c. Rejection recommendation by local tax authorities or the AIB.
- 3. If the application is accepted, Finextra creates an Account in the registry for the applicant organization. When the Account is created the Authorized Person is given a user name and password and will be appointed as main user for the Account Holder. All users must also provide a mobile phone number for additional SMS based authentication. One Account Holder organisation can have multiple users, which can be created by the main user of that Account Holder.
- 4. Finextra signs both copies of the STCs, archives one and sends the other to the Account Holder to be archived.

Finextra aims to complete the process of registration of participant as soon as possible latest within 4 weeks.

#### D.1.2. Maintenance of standing data

An Account Holder must notify Finextra without any delay, in writing of any changes due to come into effect that will result, or unplanned changes that have resulted, in the information recorded in the EECS Registration Database in relation to the Account Holder becoming inaccurate. The Account Holder himself is responsible for keeping





the Account Holder information recorded in the EECS registry accurate.

# D.1.3. Error handling:

If Finextra detects errors in the Account Holder information, it will correct them without any delay. The relevant Account Holder will be informed of such actions.

# D.2 Resignation of an Account Holder

The Account Holder must notify Finextra of intent to close its Account in written form. The effective date of closure must not be less than 30 working days from the date of receipt by Finextra.

When closing an Account, the Account Holder is responsible for paying any outstanding payments to Finextra. Finextra is not responsible for refunding any already paid fees of the Account Holder such as the yearly Account Holder's fee.

Finextra will amend the EECS Registration database to seal that Account as of the effective date on the request or 30 days from the date of receipt by Finextra, whichever is later.

Any EECS-GOs remaining in the Account of the EECS registry at the time of locking will remain there until being expired.

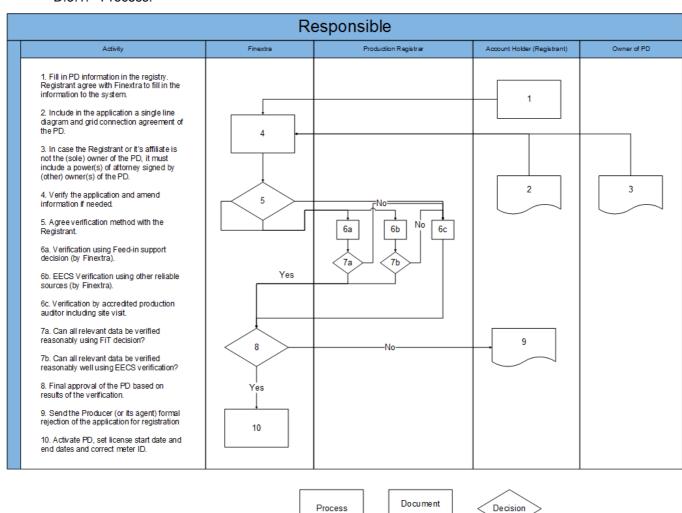
Commercial provisions of closing an Account are set in the contract between Finextra and the Account Holder.





# D.3 Registration of Production Devices

#### D.3.1. Process:



# D.3.2. Application

Account Holders, which aim to register a Production Device, are referred to as registrants. Only the owner of a Production Device, or a Registrant duly authorised by the owner, may register a Production Device into the registration database. The Production Device is verified to fulfil the requirements of the Finnish regulation on GOs. Production Devices can only be registered, if they meet the qualification criteria for EECS. To be qualified, Production Devices must:

- · be located in Finland (including Åland), and
- · be capable of producing electricity





In addition, different EECS products have additional qualification criteria:

	EECS Product	Additional criteria
GO	When relating to energy source	Ability to produce electricity using renewable energy source(s)
GO	When relating to technology	Capable of Cogeneration and conforming to the definition of a Cogeneration unit in Article 3(I) of the Cogeneration Directive and is in accordance with the guidelines established by Annex II (e) of the Cogeneration Directive
ICS:EKOE	NERGY	Registration is approved by the Scheme Operator: The Finnish Association for Nature Conservation (FANC). May only be issued belonging to a GO

The commercial provisions of registering a Production Devise (if applicable) are set out in the web-page of Fingrid (<a href="www.fingrid.fi">www.fingrid.fi</a>).

Finextra publishes relevant device information on the web-pages of Fingrid (www.fingrid.fi)

- 1. Registrant or Registrar must fill-in the following information when registering a Production Device under its Account in the registry system:
  - Production Device: Name, address, registrant, start date, commissioning date, installed capacity, earmark name and type, operator, applied EECS schemes and all owners.
  - Codes of all possible Fuels, which can be converted into energy by that Production Device. According to fuel codes in AIB EECS Fact Sheet 5.
  - Technology code of the Production Device according to technology codes in AIB EECS Fact Sheet 5.

As the Production Device is registered into the registry system, it is assigned a unique identifier, if one has not already been assigned. The identifier consists of a number with 18 numeric characters that also identifies the Domain of origin. GS1/GSRN (Global Service Relational Number) coding is used.

The Registrant must warrant that the information provided to Finextra in connection with its application is complete and accurate and that the Production Device meets the qualification criteria for EECS.

- 2. The Registrant shall also deliver a line diagram representing the Production Device with at least the following information:
  - Connection to grid(s)
  - Location and codes of all output and import meters
  - · Location of transformers
  - · Location of generation auxiliaries
  - Where there are generating auxiliaries associated with that Production Device, locations and codes of Import Meter(s), which determine the totality of electricity consumption by the Production Device;





- 3. In case the Registrant or its affiliate does not own more than 90 % of the Production Device, it must include in the application a power(s) of attorney signed by other owner(s) of the Production Device.
  - Power of Attorney is required from all owners of the PD who own more than 5 % of the PD.
  - The Power of Attorney (PoA) may give the registrant organization the authority to
    - o register the Production Device, and/or;
    - o deliver production declarations for the Production Device, and/or;
    - claim ownership of GOs issued for the Production Device (aggregation).
  - Aggregation can also be authorized later as a separate process. Power of Attorney template is published at www.fingrid.fi.
- 4. In order to be able to connect the Production Device into the registry, the Power Device's production method must be verified in accordance with the Act on Verification and Notification of Origin of Electricity. Approved methods of verification are a certificate of verification issued by a certification company i.e. on-site audit, EECS-verification or a decision of acceptance into the feed-in tariff system for renewable energy.

Finextra will check the correctness of information on application in co-operation with the Registrant.

- 5. If the Production Device satisfies both the Finnish laws and the EECS Rules, Finextra activates the Production Device in the registry database and sets next audit date and informs the Registrant.
- 6. If the Production Device does not fulfil the requirements, Finextra notifies the Registrant and the Production Device is not activated. The rejection notice shall include reasons of the rejection.

Finextra aims to complete the process of registration of production device as soon as possible. Once the Account Holder has delivered all needed documents and information, Finextra will approve the PD within 2 weeks.

# D.4 De-Registration of a Production Device

The Registrant must notify Finextra of intent to deregister their Production Device in writing. All relevant production data of a Production Device will be stored in the database also after deregistration. Commercial provision of deregistering a Production Devise are set out in the STC.

Finextra will perform the deregistration on the date specified by the owner or as soon after this date as is reasonable practicable. After deregistration EECS-GOs will not be issued for the output of the Production Device.





#### D.5 Maintenance of Production Device Registration Data

Where the capacity of an existing Production Device increases for any reason, including refurbishment or enhancement of the Production Device, then such additional capacity may be registered in the relevant EECS Registration Database as a separate element of that Production Device.

The Registrant of a Production Device must notify Finextra of any planned changes due to come into effect that will result, or unplanned changes that have resulted, in:

- Information recorded in the EECS Registration Database in relation to the Production Device becoming inaccurate; or
- Qualification criteria for the EECS Scheme ceasing to be satisfied with respect to that Production Device.

The registrant notifies Finextra of such changes by making the necessary amendments to Production Device information in the registry.

On receipt of a change of details notification (following an inspection or otherwise), Finextra will evaluate the impact of the changes on the Qualifying Criteria and respond to the Registrant within 10 working days specifying the decision taken. Finextra may respond to the changes by approving or disapproving them in the registry.

Where Finextra becomes aware that a Production Device no longer fulfils, or will no longer fulfil, the qualification criteria, the EECS Registration Database record for that Production Device will be updated to shown that the Production Device no longer qualifies for EECS Scheme Certificates with effect from:

- In relation to planned changes notified in advance, the date on which such planned changes are due to come into effect; or
   In relation to other changes, as soon as reasonably practicable after becoming
- D.5.1. The registration of a Production Device expires after five years. The Registrant must re-apply for registration for the Production Device before expiry.

#### D.6 Audit of Registered Production Devices

so aware.

Refer to Section D.3.4. Based on legislation following three audit procedures are valid for Production devices:

- On-site audits (auditor's approved by Energy Authority, see Annex 1 for weblink)
- Verification to the Production Subsidy system for Electricity Produced from Renewable Energy Sources
- EECS-audits: verification with a license of connecting to the transmission or distribution network and verifying registration data using other reliable sources (independent from the owners of the Production Devices).

The Registrant, either as the owner or on behalf of the owner and operator of the Production Device, must permit Finextra, or a Production Registrar as its agent, to





access the Production Device or records associated with it, its energy output and sources of energy.

Registrants must report any changes to standing data of a Production Device under D.5, but deviations from registered data are also sought in the Production Device audit. This is especially important regarding changes in ownership structures and metering.

If a Production Device fails to pass the requirements of the audit or the registration information has changed significantly, GOs will not be issued before corrective actions have been performed.

Relevant registration data is re-checked every 5 years. All Production Devices can also be audited at a random time if needed. If a Production Auditor or Finextra needs more information than provided by the Production Device Owner, it will be the owner's responsibility to provide this information.

Refusal to permit access may be considered a breach of the Standard Terms and Conditions.

If an inspection identifies material differences from the details recorded on the EECS Registration Database, Finextra reserves the right to request the Registrant to reapply for registration.

Following audits are valid and the Account Holder can choose which one he will supply for registration:

Production Device	On-site audit by Production Registrars	FIT (contains an onsite visit)	EECS-verification (mostly document check)
Hydro	X		X
Wind	X	Χ	X
Bio	Х	Х	
Solar	Х		х

# D.7 Registration Error/Exception Handling

The registration database shall be amended by Finextra Oy in accordance with any notification that it receives from the account holder or production auditor of changes having the effect that the information recorded in the database in relation to a specific account holder is no longer, or will cease to be accurate.

If Finextra detects an error in the information of a Production Device in the registry, it applies the procedures outlined in Chapter E.8.

When Finextra Oy determines that an EECS Market Participant is in breach of the Product Rules or determines that a Production Devise does not meet PD Qualification Criteria for an EECS Product in relation to which it is registered, Finextra shall take such action as is necessary to secure that it is compliant with EECS Rules Section E3.3.9(b), such action to include, in a case of material non-compliance by the Registrant, the withdrawal of registration of the relevant Production Device for the purposes of that EECS Product.





# **E Certificate Systems Administration**

# E.1 Issuing EECS Certificates

E.1.1. Qualification and EECS Products

EECS Certificates can be issued

- In respect of the qualifying energy output of such a Production Device during any period in which it was registered for the purpose of the EECS scheme according to 0; and
- For a maximum period of 12 months at a time; and
- After the Account Holder has made his selection regarding the issuing period.
  The GOs will be issued either monthly, quarterly or per the half year periods
  as chosen by the Account Holder. The GOs shall be however issued
  separately for each month of the period. The selection is valid for one calendar
  year and it can be separately made for each Production Device.
- To an Account Holder who does not have any outstanding fees payable to Finextra or its agents in conjunction with EECS Certificates; and
- For EECS products according following additional criteria:

EECS Product		Additional criteria	
GO	When relating to energy	respective electricity is generated using renewable	
	source	energy source(s)	
GO	When relating to technology	<ul> <li>a) where the Production Device produces high-efficient cogeneration only, the amount of electrical Output produced by that Production</li> <li>b) where the Production Device produces high-efficient cogeneration and electricity which is not high-efficient cogeneration, the amount of eligible generation calculated in accordance with Annexes II and III of the Cogeneration Directive</li> </ul>	
ICS:I	EKOENERGY	registration is approved by the Scheme Operator: The Finnish Association for Nature Conservation (FANC)	

The EECS Scheme Certificates shall be issued in such format as may be determined by AIB from time to time. The registry operator has readiness to issue high-efficient cogeneration GOs in the registry. In case EECS Scheme high-efficient cogeneration GOs shall be issues, this Domain Protocol is updated with relevant items.

The output of Production Device is metered and independently verified.

One EECS Certificate represents one MWh.

E.1.2. The issuing, transferring and cancelling of EECS certificates are arranged as to eliminate the possibility of more than one EECS certificate bearing the same purpose being issued, registered or cancelled in respect of the same unit of output.



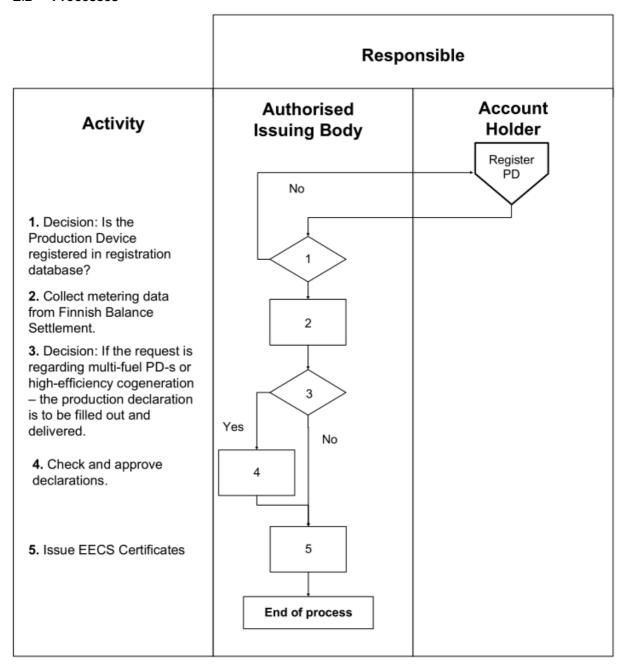


- E.1.3. The issuing of EECS certificates in this domain have been arranged as to eliminate the possibility of EECS certificates being issued in respect of the same unit of output and attributes for which other transferrable certificates (other than EECS certificates of a different type where specially permitted by the EECS Rules) have been or will be issued for the same purpose.
- E.1.4. An EECS Certificate corresponding to an EECS Product may only be issued in respect of Output:
  - which is produced by an Originating Production Device which meets the PD Qualification Criteria in respect of that EECS Product;
  - · that meets the Output Criteria for that EECS Product;
  - in respect of which the Authorized Issuing Body is in receipt of measured values of Output collected and determined by an Authorized Measurement Body (or, where the relevant Product Rules so permits, an Approved Measurement Body) which, having regard to the relevant Consumption Declaration where relevant, corroborate the amount so specified; and
  - which has been determined in accordance with the Product Rules for that EECS Product.
- E.1.5. An EECS 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 Certificate of any variety.





#### E.2 Processes



- Certificates are issued regularly for all Production Devices. The production period
  of GOs is one month. The registrant must choose whether issuing operations are
  executed in the registry on monthly, quarterly or half yearly timeframes for each
  PD. One EECS Scheme Certificate will be issued for each whole one MWh of
  qualifying energy output of the Production Device. Any identifiable residual kWh
  will be carried forward to the next production period.
- 2. Fingrid and DSOs being the measurement bodies for Finnish GOs collect production data from energy meters and send it to the registry system.
- 3. If the request is for multi-fuel PD or pumped hydro PD (a), or GOs relating to technology (b) (cogeneration GOs)
  - a. Registrant must fill in production declaration in the registry. Production declaration contains the data described in Annex 5. Amount of GOs





issued is calculated per fuel from net production data received from the measurement body defined in the balance settlement legislation and input factors in the production declaration. GOs are issued only for renewable fuels.

- b. The registrant must deliver a cogeneration declaration. The format of cogeneration declaration is AIB Cogeneration model –Excel workbook found at <a href="http://www.aib-net.org/portal/page/portal/AIB\_HOME/EECS/Cogeneration%20Model">http://www.aib-net.org/portal/page/portal/AIB\_HOME/EECS/Cogeneration%20Model</a>. The model is amended time to time by the AIB.
- 4. Finextra checks declarations that they are competent for issuing the GO.
- 5. Finextra issues EECS Certificates and deposits them to the Account nominated by the registrant in the registry.
  - a. One EECS Scheme Certificate will be issued for each whole one MWh of qualifying energy output of the Production Device. Any identifiable residual kWh will be carried forward to the next issuing period.
  - b. The Account Holder is informed of the issue of GO in the registry.

Issuing takes place on at the latest 10<sup>th</sup> day of every month or the next business day after that. Issuing can be performed after the closure of the balance settlement of the production month. Normally balance settlement is closed end of the month following the production moth.

The certificate data specified by the EECS rules shall not change in any way once an EECS GO has been properly issued except to indicate that it has expired, cancelled or been withdrawn.

#### E.3 Measurement

Only Production Devices that are equipped with metering equipment that complies with the relevant regulations for the trading of generation energy shall be registered. The metering equipment may measure on a scalar basis (meter advance only) or on a period basis (energy measured in units of time) according to the regulations. Measurement frequency should not be more than 12 months. Finextra shall issue the Finnish GOs for RES-E and cogeneration for net production. All relevant acts and national electricity market instructions regarding measurements are applied in accordance with national legislation e.g. Electricity Market Act (Sähkömarkkinalaki 588/ 2013, www.finlex.fi) and electricity market procedural instructions in Finland.

# E.4 Energy Storage (including Pumped Storage)

There are currently no energy storage or pumped storage systems in Finland.

# E.5 Combustion Fuels (e.g. Biomass)

- The Registrant of the Production Device with multiple energy sources have to report in detail on input factors in the registry. The standard calculation set out in the EECS Rules section N6.3.2 is applied.
- If a production/consumption declaration is needed, the registrant must fill in production declaration within the registry. Production declaration is described in Annex 5 but the actual declaration is filled in the registry. The methods used





in calculating the production declaration data are verified during production device verification.

- The production declaration is identical to the ones used in feed-in-tariff system, emission trading, electricity tax information and statistics.
- When issuing cogeneration GOs, the cogeneration declaration in the form of AIB cogeneration model must be included.

#### E.6 Format

EECS Certificates shall be issued in such format as may be determined by AIB from time to time.

# E.7 Transferring EECS Certificates

The Account Holder can get secure electronic access to the Account to make transfers of Certificates to another Account in the same EECS Registration Database or to another EECS Registration Database for EECS Certificates in another Domain through the website of the registry.

Only persons duly authorized by the Account Holder may request the transfer of EECS Certificates out of that Account Holder's Transferrables Account. Authorized persons can be added by the main user of that Account Holder.

The initiation of transfers is done in the registry by the selling Account Holder.

The transfer of Certificates and the confirmation of that transfer are automated.

After the Account Holder has initiated the transfer, the system instantly displays a message of whether or not the initiation has been successful.

Transfer of certificates and the confirmation of that transfer are automated.

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 certificates are returned to the Account of the original Account Holder.

When certificates are "in transit" they are not available for another transfer. The certificates leave the initiating Account Holder's account before appearing in the buying Account Holder's account.

In transfers between Accounts in two different registries, Finextra will cooperate with other Members of the EECS scheme to amend its own, or the other Members' Account Holder information.

EECS Certificates that have been cancelled or expired are not available for transfer. Where it is impossible to transfer for technical reasons, this can be overcome by cancelling Certificates 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.

All EECS certificates are allowed entrance in Finextra's registry, although only RES GOs are accepted for disclosure use in the Finnish Domain.





#### E.8 Administration of Malfunctions, Corrections and Errors

The issuing body has the right to perform corrective actions such as withdrawal or transfer of Certificates in the registry where Certificates have been erroneously issued or transferred.

In the case where erroneous GOs from another Issuing Body have been transferred to the Finextra registry, Finextra will cooperate with the other Issuing Body to resolve the issue, and preferably transfer it back to the originating Issuing Body

Transfer of certificates and the confirmation of that transfer are automated. If there are minor validation errors during transfer, the system will point out the errors in transfer. In the event of complete failure of a transfer, Finextra will reinstate the certificates in the seller's account and investigate to facilitate another attempt.

In the event when it transpires that the data in any EECS Certificate is inaccurate (whether or not through an act or omission of the Registrant of the originating Production Device):

- a. Finextra shall either withdraw those Certificates (provided that such EECS-GOs are, at the time of such Withdrawal, in the Transfer Account of that Registrant) or correct this error on the following months by issuing more or less EECS-GOs from the same Production Device of the Account Holder; and
- b. The Registrant shall pay Finextra the cost of securing the agreement of another Account Holder to the Withdrawal of EECS Certificates of the same type from that other Account Holder's Transferrables Account, so that, as far as reasonably practicable, EECS Certificates are withdrawn with an adequete volume and financial value.
- c. In case the Certificates are no longer in the Finnish domain, Finextra will cooperate with other Issuing Bodies to withdraw the erroneous Certificates.

Finextra may also alter EECS Certificates held in its EECS Registration Database so as to rectify an error which occurred prior to its transfer into the Account in which it is held at such time, provided:

- a. The Account Holder has agreed to such alteration;
- b. It is reasonably satisfied that any unjust enrichment of an EECS Scheme Participant as a consequence of such error has, to the extent reasonably practicable, been nullified;
- It is reasonably satisfied that the alteration itself does not give rise to undue enrichment of the Account Holder.

Finextra will cooperate with other Issuing Bodies in case off erroneously issued GOs.

Once issued, the details of an EECS Certificate cannot be altered or deleted except to correct an error

#### E.9 End of life of EECS Certificates - Cancellation

Account Holders possessing certificates in the registry, can perform cancellations by executing the transaction in the registry. The Account Holder must specify the Certificates to be cancelled as well as the country of consumption, cancellation





purpose, usage category, name, type and location of beneficiary and related consumption period.

The information required in the cancellation request and contained in a cancellation statement is described in Annex 3.

EECS domains to which a secure electronic transfer of certificates is possible are not included in the list of "country of consumption", which prevents ex-domain cancellations from Finland to these domains.

The cancellation of Certificates is automated. Certificates can only be cancelled once. Cancelled Certificates are removed from transferrables account by changing their status to "cancelled" so they do not appear in any Account of the registry after the Cancellation. The Account Holder performing the cancellation has full access to see the details of the cancellation, which are printable in the registry or they can order an official Cancellation Statement from Finextra.

Having performed a cancellation, the Account Holder receives a confirmation of the success or failure of the cancellation instantly in the registry.

Cancellation is removing a Certificate from circulation. Once cancelled, a Certificate cannot be moved to any other account, and so is no longer tradable.

When cancelling a multiproduct certificate (GO + ICS:EKOenergy) both GO and ICS: EKOenergy are cancelled at the same time.

# E.9.1. Forms

A cancellation statement can be printed out from the registry by the Account Holder organization, which has performed the cancellation. An official paper version of the cancellation statement can also be ordered from Finextra.

According to Section 2 of the regulation, the obligation to certify the origin of electricity informed as having been produced from renewable energy sources must be met by cancelling guarantees of origin allocated to the previous calendar year with the registrar by 31 March the following year.

Finextra reports to Energy Authority by 15.4. the amounts of issued, cancelled, imported, exported and expired GOs from previous year.

Finextra shall each month provide to the General Secretary a statement of the number of EECS Certificates Cancelled for use outside of its Domain during that month including sub-totals for each technology and for each other Domain (or country, if no Domain exists for the relevant country).

## E.10 End of life of EECS Certificates - Expiry

According to by the Act on Verification and Notification of Origin of Electricity (1129/2003) and as amended by 445/2013, Guarantees of Origin expire in Finland 12 months after the end of production period.

Expiry is handled automatically in the Finnish registry on the date which is 12 months after the end of the production period of relevant Production Device.





EECS Certificates which have expired are no longer valid for transfer.

Certificates that have already expired for local use are prevented from import.

When expiring a multiproduct certificate (GO + ICS:EKOenergy) both GO and ICS: EKOenergy are expired at the same time.

# E.11 End of life of EECS Certificates - Withdrawal

Finextra may withdraw an EECS scheme certificate 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 EECS market Participant under provisions of its STC that meet the criterion at EECS Rules Section E7.1.1. EECS Certificates may be withdrawn (or amended) by Finextra having regard to the objective of securing the accuracy of EECS Certificates to ensure that no unjust enrichment occurs as a result of an error of any unauthorized access to, or malfunctioning of an EECS Registration Database.





# F Activity Reporting

### F.1 Public Reports

Finextra will publish on its website every three months information on issued, transferred, cancelled and expired GOs.

#### F.2 Record retention

Data stored in the electronic registry, metering production data and all records relating to EECS Scheme Certificates shall be retained for at least for 6 years in electronic format, which is either in an electronic archive or by means of database backups.

# F.3 Orderly Market reporting

- F.3.1. Finextra shall report failures by EECS Participants to comply with the provisions of Product Rules to the Competent Authorities in relation to such matters. Such failures shall include behaviour by EECS Participants of which the Authorised Issuing Body is aware of and which, in its reasonable opinion, amounts to a breach of Competition Law, or applicable law governing the conduct of financial markets.
- F.3.2. Finextra shall notify the AIB of any report made by it under section F.3.1 and shall provide the AIB with as much information in relation to such report as is consistent with any duty of confidentiality it may have to the relevant EECS Participant(s).
- F.3.3. Where Finextra determines that a EECS Participant is in breach of the Product Rules or determines that a Production Device does not meet PD Qualification Criteria for an EECS Product in relation to which it is registered, that Authorised Issuing Body shall:
  - a. take such action as is necessary to ensure compliance
  - and shall notify the AIB of such breach where Finextra is of the reasonable opinion that such breach could affect the transfer of EECS Certificates out of its EECS Registration Database





# G Association of Issuing Bodies

The Association of Issuing Bodies is an enabler of European energy certificate schemes. The AIB promotes the use of a standardized system, based on harmonized environment, structures and procedures in order to ensure the reliable operation of European energy certificate systems.

# G.1 Membership

Where Finextra ceases to be an Authorised Issuing Body in relation to an EECS Product, it shall revise its EECS Registration Database so that each Production Devise in the Domain Finland ceases to be registered for the purposes of that EECS Product.

Where Finextra ceases to be a Scheme Member of a an EECS Scheme it shall revise its EECS Registration Database so that every Production Devise registered therein ceases to be registered for the purposes of each EECS Product in relation to the Output to which that EECS Scheme relates.

# G.2 Complaints to the AIB

EECS Market Participant may notify in writing the General Secretary of AIB that:

- a) An Authorised Issuing Body in relation to an EECS Product is in breach of any of the provisions of Product Rules in relation to that EECS Product; or
- b) any Product Rules do not comply with the relevant provisions of the EECS Rules.

and is provided with evidence substantiating such allegation, and evidence that the Authorised Issuing Body has been given adequate opportunity to respond to such allegation, the General Secretary shall invite the relevant Authorised Issuing Body to respond to the allegation.





# **H** Change Control

#### H.1 Complaints and Disputes

Finextra will endeavour to deal with complaints received as soon as possible and within a period of 20 business days. Treatment of the complaint and disputes will be made in accordance with Finnish law as agreed in the STC.

# H.2 Change requests

An Account Holder may propose a modification to this Domain Protocol.

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 Finextra

On receipt of such a request, Finextra will:

- Respond to the request within 10 working days, describing the procedures to be followed, and estimating when a reply can be expected;
- Consult with the other EECS Account Holders within Finland;
- Decide whether the request and its consequences are in its opinion reasonable;
- If the proposal leads to the modification of the Domain Protocol or if it is otherwise to be seen important to disseminate, inform the EECS Account Holders within Finland the outcome of this decision.

Finextra may make such modifications to this Domain Protocol as are in its opinion necessary to the effective and efficient operation of the market.

Any modifications to this Domain Protocol are subject to approval by the AIB that such changes do not conflict with the Rules of the Association of Issuing Bodies (AIB) for The European Energy Certification System.

Implementation of modifications will be notified by email to the Account Holder and will take effect on publication of the documentation on the website www.aib-net.org.





# **Annex 1: Contacts List**

# **Competent Authority**

Company	Fingrid Oyj
Contact person	Kirsi Salmivaara
Address	P.O.Box 530, FI-00101 Helsinki
Country	Finland
Phone	+358 30 395 5000
E-mail	go@finextra.fi

# Issuing Body & Production Auditor

Company	Finextra Oy
Contact person	Kirsi Salmivaara
Address	P.O.Box 530, FI-00101 Helsinki
Country	Finland
Phone	+358 30 395 5000
E-mail	go@finextra.fi

# Registry Support

Company	Finextra Oy
Contact person	Kirsi Salmivaara
Address	P.O.Box 530, FI-00101 Helsinki
Country	Finland
Phone	+358 30 395 5000
E-mail	go@finextra.fi

# Competent Body for Disclosure

Company	Energy Authority
Contact person	http://www.energiavirasto.fi/
Address	Lintulahdenkuja 4, 00530 Helsinki
Country	Finland
Phone	+358 29 5050 000
E-mail	

# ICS:EKOENERGY Scheme Operator

Company	The Finnish Association for
	Nature Conservation
Contact person	Steven Vanholme
Address	Itälahdenkatu 22 B, 00210
	Helsinki
Country	Finland
Phone	+358 46 594 6072





E-mail	steven.vanholme@sll.fi
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# Measurement Body

Measurement bodies in Finland: Fingrid Oyj (<a href="www.fingrid.fi">www.fingrid.fi</a>) and local distribution system operators (list of DSOs at <a href="www.energiavirasto.fi">www.energiavirasto.fi</a>)

# **Production Registrars**

Production registrars in Finland are: <a href="http://www.energiavirasto.fi/sahkon-tuottajan-hakeutuminen-alkuperatakuujarjest">http://www.energiavirasto.fi/sahkon-tuottajan-hakeutuminen-alkuperatakuujarjest</a> (in Finnish)

- DNV Certification Oy/Ab
- Enemi Oy
- Inspecta Sertifiointi Oy
- Tegniq Wind Oy

# **Annex 2: Know-Your-Customer Questionnaire**

See separate document: Know-Your-Customer Finextra, available on

 $\underline{\text{http://www.fingrid.fi/EN/CUSTOMERS/QARANTEESOFORIGIN/JOINING/Pages/default.aspx}}$ 

# **Annex 3: Model Cancellation Statement**









# Cancellation Statement - Guarantee of Origin

This cancellation statement certifies that the Guarantees of Origin listed hereunder have been cancelled. The indicated certificates on this Cancellation Statement are no longer tradable. In any case the onward sale of a Cancellation Statement in any format is prohibited. It is as well forbidden to copy or amend this Cancellation Statement.

Amount by Technology
V. January 1306926. Z., ALV rok. griji (Inswira II www.Engrid. B









#### **Cancelled Certificates**

Certificate Number (From)	Certificate Number (To)	Domain and Date of Issue	Amount	Fuel and Technology	Production Period	Certificate Type (s)	Production Device	Support Type (s)

#### **Production Device Information**

Name	GSRN	Domain	Commission Date	Technology	Fuel(s)	Location	Support Type(s)

echnologies		Fuels				
Technology ID	Name		Fuel ID	Name		

Finestra Oy

Katuranite
Lithinopinite 21

Protincelle PL 330

Puludin

Pakes

V. humann 1300/920-2, ALV rok gorjij finansira ili

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# Annex 4: ICS:Ekoenergy: Appointment letter from the Finnish Association for Nature Conservation



To: Association of Issuing Bodies (AIB) c/o. Phil Moody 21/23 Station Road - Gerrards Cross - Bucks SL9 8ES - United Kingdom

Mandate letter EKOenergy - Finextra Oy

Dear Mr van der Lee, dear Mr Moody,

We hereby inform you about the appointment of Finextra Oy, as responsible entity to issue EKOenergy ICS certificates for the domain Finland. (Or otherwise said to do all necessary to enable the mentioning of the EKOenergy ICS tag on GOs of Finnish origin).

Our contact person for this issue is Steven Vanholme, -358 568 73 85, Steven. Vanholme@sll.fi

Yours sincerely,

Helsinki, 21th July 2014,

Steven Vanholme
EKOenergy Secretariat
Itälahdenkatu 22b 00210 Helsinki Finland info@ekoenergy.org
++358 50 568 73 85





# **Annex 5: Model consumption declaration**

- Fuel distributions 2017 |

   The data in the Fuel Distribution is added in unit MWh.

   Set the value of the column to zero if the specified fuel is not used during some month. Issuing can't be done if value is empty.

   You can input the fuel distribution from an Excel file. In the Excel file, you need to specify the fuel type codes on the first row and the number of the month in the first column. Excel template

Correspondence bet	ween fuel codes	of Statistics Finl	and and EECS

2017 ∨	F01010201 - Renewable / Solid / Industrial and commercial waste / Biogenic	F01010300 - Renewable / Solid / Wood	F01010301 - Renewable / Solid / Wood / Forestry products	F01010302 - Renewable / Solid / Wood / Forestry by-products & waste	F01010501 - Renewable / Solid / Biomass from agriculture / Agricultural products	F01010502 - Renewable / Solid / Biomass from agriculture / Agricultural by-products & waste	F02000000 - Fossil	Total
01	0			0	0	0		
02	0			0	0	0		
03	0			0	0	0		
04								
05								
06								
07								
08								
09								
10								
11								
12								

ave X Cancel