

Guidelines on the application of guarantees of origin for biogas from the gas grid in the EU ETS prepared in cooperation with the Ministry of Economy of the Slovak Republic and the operator of the Registry of Renewable Gases of the Slovak Republic

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These guidelines are only relevant if the operator of an EU ETS plant wishes to apply a guarantee of origin for biogas¹ to EU ETS emissions reductions incurred in year X (reported in the emissions report to be submitted by 1. 3. X+1).

Commission Implementing Regulation (EU) 2018/2066 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council amending Commission Regulation (EU) No 601/2012 in Article 39(3) ("the Regulation") establishes that the operator shall not use any analysis or estimation methods to determine the proportion of biomass in the natural gas received from the natural gas network to which the biogas is added.

The operator may determine that a certain quantity of natural gas from the gas network is biogas by using the following methodology:

The operator may determine the biomass fraction using purchase records of biogas of equivalent energy content, provided that the operator provides evidence to the satisfaction of the competent authority (district authority) that:

- a) there is no double counting of the same biogas quantity, in particular that the biogas purchased is not claimed to be used by anyone else, including through a disclosure of a guarantee of origin as defined in Article 2(12) of Directive (EU) 2018/2001
- b) the operator and the biogas producer are connected to the same gas grid.

For the purpose of demonstrating compliance with this paragraph, the operator may use the data recorded in a database set up by one or more Member States which enables tracing of transfers of biogas, and where these data have been transferred to the account of the operator of

¹ EU ETS legislation only uses the term biogas and does not distinguish biomethane.

the Registry of Renewable Gases of the Slovak Republic.

Article 38(5) of the Regulation (sustainability criteria and greenhouse gas savings) applies to the biogas in question.

Pursuant to Section 11b(1) of Act No. 309/2009 Coll. on the Promotion of Renewable Energy Sources and High Efficiency Combined Production and on amendments and additions to certain acts (hereinafter referred to as 309/2009"), the Registry of Renewable Gases shall be established and maintained by the distribution network operator, which, on the basis of the decision of the Ministry of Economy of the Slovak Republic, performs the tasks of the gas dispatching authority in the defined territory (the decision of the Ministry of Economy of the Slovak Republic designates the company SPP - distribúcia, a.s.), for the purposes of keeping track of the production of renewable gases and the issuing of guarantees of origin of the renewable gas. The specific conditions for the operation of the Registry of Renewable Gases shall be regulated by the Operating Regulations.²

An operator in the EU ETS may declare a certain amount of biogas as part of natural gas by applying a guarantee of origin for biogas on the basis of the above-mentioned Implementing Regulation if the following conditions are met:

1. The guarantee of origin for biogas issued for the quantity of biogas referred to in point 2 shall correspond to the guarantee of origin referred to in Article 2(12) and Article 19 of Renewable Energy Directive 2018/2001. Guarantees of origin shall be valid for 12 months after the production of the relevant unit of energy.

2. The guarantee of origin for biogas in Slovak legislation under Act No 309/2009 corresponds to the guarantee of origin of renewable gas or the confirmation on amount of biomethane. The biogas must be physically delivered to the gas distribution network in the country of production with a connection to the gas network of the Slovak Republic.

3. The guarantee of origin for biogas is purchased for the benefit of the EU ETS plant operator from the owner who has registered it in their account in the electronic registry of a country that is an EU Member State or a country with which the EU has concluded an agreement on the mutual recognition of guarantees of origin issued in the Union and compatible guarantees of origin systems established in that third country (see Article 19(11) of Renewable Energy Directive 2018/2001).

4. The guarantee of origin for biogas is transferred after the purchase in an electronic registry to the EU ETS operator of the plant, which has an account established in the Registry of Renewable Gases of the Slovak Republic. The operator of the EU ETS plant shall cancel the

² <https://www.spp-distribucia.sk/dodavatelja/legislativa-a-cenniky/prevadzkovy-poriadok/>

guarantee of origin for biogas on their account in the Registry of Renewable Gases of the Slovak Republic, and the Registry shall issue a document stating that the cancellation was made for the purpose of demonstrating the consumption of biogas in the specific EU ETS plant. The operator of the SK Registry of Renewable Gases shall keep a record of the cancelled guarantees of origin in the account of the operator of the EU ETS plant in the SK Registry of Renewable Gases.

5. In case of confirmation of amount of biomethane, the operator shall demonstrate the amount of biomethane in the EU ETS as part of the natural gas via a confirmation of amount of biomethane cancelled by the Regulatory Office for Network Industries for electricity production from biomethane. The operator of the SK Registry for Renewable Gases shall keep a record of cancelled biomethane guarantees in the SK Registry of Renewable Gases.

6. The operator of the EU ETS plant has a monitoring plan approved by the district authority (pursuant to Articles 15(2) and 16(2) of the Regulation).

7. The EU ETS plant operator shall make available a document issued by the SK Registry of Renewable Gases declaring the cancelled guarantee of origin for biogas and from which it is possible to determine the amount of biogas energy delivered to the gas grid in the country of issue of the guarantee of origin for biogas.

8. EU ETS plant operator shall deliver a verified report on emissions pursuant to Section 21(1)(a) of Act No 414/2012 Coll. on Emission Allowance Trading and on Amendments and Additions to Certain Acts (hereinafter referred to as Act No 414/2012 Coll.) to the district authority by 1.3. X.

Monitoring plan update

Pursuant to Section 27(1)(g) of Act No 414/2012, the District Authority shall approve any significant change to the monitoring plan for the detection and reporting of greenhouse gas emissions of the operator.

Pursuant to Article 21(1)(d) of Act No 414/2012, the operator is obliged to notify the district authority of any significant change to the monitoring plan within 30 days of the change. They shall update the monitoring plan in particular in the following parts:

D. Calculation-based approaches

7 Calculation

(a) Description of the calculation-based approach for monitoring CO₂ emissions.

(describe that the operator uses a guarantee of origin for biogas)

(d) List of sources of information for standard values of calculation factors.

(add description of information source = " Guidelines on the application of the guarantee of

origin for biogas from the gas network in the EU ETS")

(l) Description of the method used, where necessary, to determine the quantities of biogas on the basis of the purchase records in accordance with Article 39(4).

E. Source streams

8 Details of activity data precision levels and calculation factors used

Calculation factors:

(f) Applicable levels for calculation factors:

Biomass fraction: select level 1 as the applicable level (= application of Article 39(3) and (4) in the case of natural gas networks into which biogas is injected)

(g) Detailed data for calculation factors:

Biomass fraction: select as source reference number the source that has been filled in D.7.d), the remaining parts can be left blank as the % may be different.

Emissions report

In the emissions report, the operator shall report the calculation factors in accordance with the approved monitoring plan. Under 'BioC' (biomass fraction), the operator shall indicate the percentage of natural gas replaced by biogas. The percentage shall be calculated from the ratio of the amount of heat from biogas to the amount of heat from natural gas on the basis of invoices/guarantees of origin. The form then calculates CO₂ from fossil fuels and CO₂ from biomass (these emissions are not included in the total emissions of the plant.)

Verification of the emissions report

The verifier shall verify the emissions report of the operator claiming a guarantee of origin for biogas in accordance with the relevant legislation and these Guidelines. The operator shall make available to the verifier proof of the cancellation of the biogas guarantee of origin in the SK Registry of Renewable Gases in favour of the operator and the natural gas invoices on the basis of which it shall check the calculation of the biomass fraction.