

Priekšlikumu un komentāru kopsavilkums*, kas saņemti publiskās apspriešanas ietvaros par grozījumiem gāzes domēna protokolā (Publiskā apspriešana noritēja no 19.04.2024. līdz 03.05.2024.) *Atbildes sagatavotas tādā valodā kādā saņemti attiecīgie priekšlikumi

Summary* of proposals and comments received as part of the Public Consultation on Amendments to the Gas Domain Protocol (Public consultation took place from 19.04.2024 to 03.05.2024) *The answers are prepared in the language in which the respective proposals were received

Nr./ No.	Attiecīgā dokumenta norma / Relevant regulation norm or initial proposal for the amendments	Komentārs vai priekšlikums / Comment or proposal	Conexus viedoklis par komentāru vai priekšlikumu / The Opinion of Conexus regarding the comment or proposal
1.	(amended) C.1.4 Overview of the gas market (and overall Latvian energy market) can be accessed on the webpage of national regulatory authority of Latvia – the Public Utilities Commission (hereinafter also – the Regulator): https://www.sprk.gov.lv/en/content/natural-gas There is a potential of market access for remotely located biomethane producers, that would want to inject biomethane into the interconnected gas network, by transporting biomethane as bioCNG using vehicles for biomethane injection into the interconnected gas network, following the concept of “virtual pipeline”. In this case	C.1.5. It will be useful to relate the changes also to straight deliveries from producer to Customer.	Thank you for the proposal. Since described scenario is about processes regarding gas, that is produced and delivered without injecting it into the interconnected gas system, and delivery in your described scenario is done directly from production facility to customer, it is out of the scope of this Domain Protocol. Section 117. ⁴ of Energy Law foresees, that: <i>"The Cabinet of Ministers determines the procedure for monitoring and accounting for the circulation of biomethane that is not fed into the interconnected system, as well as the procedure for supporting</i>

	<p>metering of the gross energy is performed at the injection point into the interconnected gas network by the same Authorised Measurement body as in the case of network-connected Production Devices. The amount of the Net energy for issuing of the EECS GOs is calculated following the same procedure as in the case of network-connected Production Devices (see section E.1).</p>		<p><i>commercial activities for gas obtained from renewable energy resources.</i>"</p> <p>Domain Protocol may include issues that have a subordinate regulatory framework, where there is no such for off-grid gas. After introduction of appropriate national regulation, it then in future might be reflected in this Domain Protocol.</p>
2.	<p>(new) C.2.11 In order to avoid double counting of biomethane delivered via the virtual pipeline to the biomethane injection point in the interconnected gas network, an Account Holder applying for an EECS GO is prohibited from certifying the same energy unit twice, other than with the voluntary schemes for sustainability certification, the details and reference of which are provided to the Conexus for inclusion in the EECS GO, when submitting the EECS GO issuing request.</p>	<p>C.2.11. What voluntary scheme data will be required? PoS ID number or more info?</p>	<p>Since this is a voluntary process, any of the optional data can be provided – all together or separate data fields as described in ANNEX 5 of the Domain Protocol.</p> <p>This means that person requesting EECS GOs can submit only PoS ID providing it in the ANNEX 5, data field “Sustainability additional information” and it shall be approved by Production Auditor, or it is possible to add any other optional information about Sustainability Certification Body, Sustainability Scheme, Link to Sustainability audit report etc., based on the persons’ needs. Issuing Body will include this information in the EECS GO. Submission of information described in ANNEX 5 is the producer's free choice and responsibility as to whether the amount</p>

			of data submitted will be satisfactory to its client after EECS GO issuance.
3.	(new) C.2.11 In order to avoid double counting of biomethane delivered via the virtual pipeline to the biomethane injection point in the interconnected gas network, an Account Holder applying for an EECS GO is prohibited from certifying the same energy unit twice, other than with the voluntary schemes for sustainability certification, the details and reference of which are provided to the Conexus for inclusion in the EECS GO, when submitting the EECS GO issuing request.	C2.11. To foresee biomethane transfer to Estonian, Finland markets. In Estonia for example is different certification system and it could be valuable if Conexus issues biomethane transfer to Estonia acknowledgment instead of GO certificates. At least that is what colleagues in Estonia ask for – acknowledgement – that gas was not used in Latvia.	Way to prove that biomethane is actually biomethane, is by issuing EECS GO. As long as EECS GO is not cancelled, EECS GO is a proof that biomethane is not consumed. Conexus has no mandate as GO issuing body or gas Transmission system operator to issue mentioned other document, as “acknowledgement”. At the same time regarding biomethanes’ export to Estonia, Elering AS as the nationally appointed competent body for guarantees of origin is working towards allowing cross-border transfer of GOs via Association of Issuing Bodies’ central hub.
4.	(amended reference) D.1.8 The request is considered submitted only after the applicant has submitted to Conexus all documents and additional information requested by Conexus pursuant to section D.1.1. Conexus shall within five business days from the receipt of the documents and additional information prepare the STC and shall send it to the applicant electronically.	D1.8. Please, specify what does it mean by "all additional information"?	This means, in accordance with D.1.1, that to register as an Account Holder in the Registry applicant must submit documents and information described in Annex 2. In case any of the information or documents are missing, Conexus informs applicant what “additional information” is missing and needed, and only when ANNEX 2 with enclosed documents is

			<p>fully submitted, Conexus within 5 business days prepares and sends Standard Terms and Conditions to the applicant.</p> <p>To clarify, proposal to amend domain protocol as follows:</p> <p>D.1.8 The request is considered submitted only after the applicant has submitted to Conexus all information pursuant to Annex 2 of this Domain Protocol. Conexus shall within five business days from the receipt of the documents and additional information, as foreseen in Annex 2 of this Domain Protocol, prepare the STC and shall send it to the applicant electronically.</p>
5.	<p>D.5.1.1 Registrants shall provide the following information to Conexus, where plant requirements are always related to the EECS standard, and that is: (...)</p> <p>e. details of the Exit Measurement Point(s) where the Export Meter(s) are for the Production Device and whether or not Production Device is connected to gas transmission system; or gas distribution system or transported by vehicle to the biomethane injection point, where the measurements of that point are used to</p>	<p>D5.1.1. Please, provide more information what means by “virtual gas meter”?</p>	<p>To explain, this is concept for Conexus IT system, meaning that Conexus will develop internal solution of how to allocate the readings of single physical metering device at the biomethane injection point to each Production Device. It is required to:</p> <ol style="list-style-type: none"> 1) ensure corresponding data requirements and protocols of the GO electronic registry “G-Rex”; 2) ensure the accounting of the biomethane cargo amount injected by the relevant

	<p>determine how much was produced at that Production Device. For this purpose, Conexus creates virtual gas meter;</p>		<p>production device and the correct reflection of the data in the IT system.</p> <p>Conexus is the Authorised Measuring body for grid injected gas; therefore, Conexus has access and data about measurement devices at the grid injection, details on measurement devices can be provided by Conexus.</p> <p>D.5.1.1 Registrants shall provide the following information to Conexus, where plant requirements are always related to the EECS standard, and that is: (...) e. details of the Exit Measurement Point(s) for the Production Device; where the Export Meter(s) are for the Production Device and whether or not Production Device is connected to gas transmission system; or gas distribution system or transported by vehicle to the biomethane injection point, where the measurements of that point are used to determine how much was produced at that Production Device. For this purpose Conexus creates virtual gas meter;</p>
6.	D.5.1.1 Registrants shall provide the following information to Conexus, where	D.5.1.1. (e) Clarify – purpose of Conexus virtual gas meter – gas metering results	Since Conexus is nationally appointed gas measuring body for grid injected gas,

	<p>plant requirements are always related to the EECS standard, and that is: (...)</p> <p>e. details of the Exit Measurement Point(s) where the Export Meter(s) are for the Production Device and whether or not Production Device is connected to gas transmission system; or gas distribution system or transported by vehicle to the biomethane injection point, where the measurements of that point are used to determine how much was produced at that Production Device. For this purpose Conexus creates virtual gas meter;</p>	<p>from injection point will determine how much was produced at Production device?</p>	<p>Conexus issues EECS GOs only for the gas physically injected into the system.</p> <p>The purpose of the “virtual meter” is to allocate and track in Conexus IT systems (Conexus client portal and G-Rex GO Registry) the amount of gas injected into the system by each individual Production Device, which are not physically connected to either transmission or distribution system. See also explanation on (5)</p>
7.	<p>D.5.1.1 Registrants shall provide the following information to Conexus, where plant requirements are always related to the EECS standard, and that is: (...)</p> <p>f. details of any Production Auxiliaries associated with the Production Device;</p>	<p>D 5.1.1. (f) Please, provide description of Production Auxiliaries and Production Device. What are examples of Production Auxiliaries?</p>	<p>Auxiliary determination is within the auditor's competence by checking the production process and following the EECS rules and the CEN standard, where the Renewable Energy Directive states that it shall be ensured that the imposed requirements comply with the standard CEN - EN 16325.</p> <p>1) According to EECS Rules: Production Auxiliary - A device that consumes some of the energy produced by a Production Device in order to prepare Input for consumption by that Production Device.</p>

			<p>Nett Gas Production - The Gas produced by a Production Device as evidenced by measured values collected and determined by an Authorised Measurement Body (or, where appropriate, an Approved Measurement Body) with reference to its Import and Export Meters (adjusted by meter amendments and the outcome of any disputes) minus the demand of any Production Auxiliaries and minus losses due to heating, compression and pumping on the site of the Production Device. The energy consumed by a Production Auxiliary from a non-gaseous energy carrier is quantified as the equivalent energy content of the amount of gas that can be produced with this auxiliary energy, and state-of-the-art methods shall be used to determine conversion reference efficiency in accordance with the EECS Rules Subsidiary Document “Determination of Conversion Efficiency.</p> <p>2) According to draft CEN EN EN16325</p> <p>auxiliary - item of the production device that consumes energy and is required for the functional operation of that production device.</p>
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8.	D.8.4 In case of using biomethane injection points, Producer is obliged to maintain an auditable log of deliveries of produced energy for entry in an amount that provides assurance to the Production Auditor about the traceability of deliveries.	D 8.4. We should have better understanding what data would be required in this “auditable cargo movement registry” – is it date, place and gas volumes or something more is expected?	The proposed minimum is acceptable, while it is important to ensure that the auditor is comfortable with path/cargo movement tracking. Auditable log organization is the manufacturer's own free provision of business processes, in which Conexus does not interfere and which is approved by the independent, accredited auditor.

9.	<p>D.8.6 Registrant must notify of all changes to the information concerning the Production Device, otherwise production is not eligible for EECS GO issuance. This is particularly important as regards information concerning changes in ownership and metering. If a Production Device does not fulfil the verification requirements, or if the registration information has changed significantly, production is not eligible for EECS GOs issuance until corrective measures have been taken.</p>	<p>D 8.6. For those producing biomethane away from grid and delivering with virtual pipeline – Production Device metering devices are located at injection point – and requirements apply there? Commercial metering intended only at site of injection.</p>	<p>Comment fully noted. Measuring of injected gas is done at the injection point and is responsibility of Conexus, therefore proposal to amend D.8.6. as follows:</p> <p>D.8.6 Registrant must notify of all changes to the information concerning the Production Device, otherwise production is not eligible for EECS GO issuance. This is particularly important as regards information concerning changes in ownership and metering. If a Production Device does not fulfil the verification requirements, or if the registration information has changed significantly, production is not eligible for EECS GOs issuance until corrective measures have been taken.</p>
10.	<p>E.1.16 Each vehicle can transport biomethane for injection at the biomethane injection point from only one Production Device at a time.</p>	<p>E1.16. Change the vehicle to the "container" or at least clarify – that here – that truck itself can be different. It will be good to explain that containers could be exchange between the biomethane producers, but couldn't be exchanged between natural gas and biomethane. Add to Domain restrictions – to what are criteria when compressed biomethane containers</p>	<p>Thank you for the proposal, it is taken into account.</p> <p>Please see amended E.1.16. as follows: E.1.16 Each container can transport biomethane for injection to the biomethane injection point from only one Production Device at a time.</p>

		can be used to bring gas to injection point from two different producers.	To request EECS GOs - 1) need to register account in the Conexus registry; 2) register Production Device (detailed procedure in addition to Domain Protocol explained here: https://www.conexus.lv/how-obtain-gas-guarantees-origin) Technical criteria, cooperation and grid access is regulated in separate agreements.
11.	E.1.18 The Registrant must ensure the retention of auditable records related to biomethane production and transportation to the biomethane injection point for at least 10 years after production of relevant biomethane unit.	E 1.18. Add more precise scope of data to be stored for 10 year, as well as please explain necessity to store so long period. The period must be equal the life time of GO certificate.	<p>Thank you for your comment. Having records of relevant data for longer period comparing to EECS GO lifetime is a requirement from EECS Rules. EECS Rules C.5.1.2. gives obligation to retain all records to EECS GO for not less than 6 years after its Cancellation or Expiry.</p> <p>In electricity sector Latvian issuing body for electricity has a rule for being able to ensure data retention for no less than 10 years after EECS GO cancellation or expiry.</p> <p>Conexus notes your comment and proposes to amend E.1.18. as follows:</p> <p>E.1.18 The Registrant must ensure the retention of auditable records related to</p>

			biomethane production and transportation to the biomethane injection point for at least <u>6</u> years after production of relevant biomethane <u>in the Production Device</u> .
12.	E.1.20. Any grid injected biomethane must comply with the Rules of Cabinet of Ministers of September 13, 2022 No. 567 “Rules on requirements for the introduction and transportation of biomethane and liquefied natural gas converted into a gaseous state into the natural gas transmission and distribution system” (available here: https://likumi.lv/ta/id/335532), where according to Annex 1, among other, ethane (C ₂ H ₆), propane (C ₃ H ₈), butane (C ₄ H ₁₀ and higher hydrocarbons) presence is not allowed. In case any of these parameters occur, the injection must be stopped until appropriate gas quality is ensured and EECS GOs are not issued for the amount of gas in which the existence of the above-mentioned parameters was ascertained.	E 1.20. In practice we should leave some tolerance here – our colleagues in Finland say – that few ppm (few parts per million molecules) could be higher hydrocarbons – naturally created by biogas. Any fossil mixtures would have them in thousands.	For Conexus it is mandatory to work within the framework of prescribed legal acts, where the requirements for the gas to be injected into the interconnected gas system are determined by the Cabinet of Ministers Rules (No. 567 “Rules on requirements for the introduction and transportation of biomethane and liquefied natural gas converted into a gaseous state into the natural gas transmission and distribution system”) in accordance with the Energy Law.
13.	E.4.2 No EECS GOs are cancelled at the Input and issued for the Output of an energy storage device such as Inčukalns Underground gas storage, except for the	E4.2. What do you understand under shrinking gas, we propose to change to: fuel gas or cushion gas or technological demand gas.	Thank you for your proposal. Fully noted and E.4.2. will be amended as follows:

	<p>biomethane supplied as shrinkage gas and used for the injection of biomethane into the Inčukalns underground gas storage facility. The amount of GOs to be cancelled will be determined according to the data provided by the storage operator according to the rules of the use of Inčukalns underground gas storage.</p>		<p>E.4.2 No EECS GOs are cancelled at the Input and issued for the Output of an energy storage device such as Inčukalns Underground gas storage, except for the biomethane supplied as fuel gas and used for the injection of biomethane into the Inčukalns underground gas storage facility. The amount of GOs to be cancelled will be determined according to the data provided by the storage operator according to the rules of the use of Inčukalns underground gas storage.</p>
14.	N/A	<p>Secināms, ka domēna protokolam vēl ir nepieciešami uzlabojumi, jo definīciju trūkums liedz dokumentu izvērtēt pietiekamā kvalitātē. Salīdzinot ar EECS (European Energy Certificate System) noteikumiem, GDP trūkst definīciju tādiem svarīgiem lielumiem kā Output, Export Energy, Gross Gas un, lasot dokumentu, tā arī netop skaidrs, kā īsti sistēma strādās dažādos gadījumos.</p> <p>Pie tam ir ieviestas jaunas definīcijas, kurām arī ir nepieciešams precīzs izskaidrojums, jo nav skaidra to nozīme (piemēram, virtual gas meter).</p> <p>Gribam atzīmēt, ka balstoties uz EECS metodoloģiju (shematiski norāde atrodama</p>	<p>Atbilstoši Enerģētikas likumam Conexus ir atbildīgā institūcija par savstarpēji savienotajā sistēmā ievadāmās gāzes uzskaiti un kvalitātes kontroli. Attiecīgi balstoties uz Enerģētikas likumu un ievērojot EECS noteikumu prasības, Conexus ir valsts izraudzītā mērinstitūcija (Authorized Measurement Body), kura var veikt saražotās gāzes uzskaiti un kvalitātes kontroli tikai sistēmā ievadītajai gāzei.</p> <p>Vienīgais veids kā īstenot atbilstošu par mērījumiem atbildīgās institūcijas funkciju un izdot izcelsmes apliecinājumus ir izdot tos par sistēmā ievadīto gāzes daudzumu atņemot palīgiekārtu (Production Auxiliary) patēriņu.</p>

		<p>6.lpp), Gross daudzums, kas atsaucas uz eksporta mērītāju, ir daudzums, kas tiek saražots biometāna stacijā. To pamato sekojošas definīcijas:</p> <ol style="list-style-type: none"> 1. Output An amount of nett energy content of a specific Energy Carrier yielded by a Production Device and measured by a Measurement Body. 2. Export Meter - Has the meaning assigned to an Exit Measurement Point by the definition in section B1.1.1 of the EECS Rules and refers to a device, or collection of devices, and supporting arrangements for determining the quantity of Gas flowing from a Production Device to a distribution or transportation system. 3. The total gross Gas produced by a Production Device; as evidenced by measured values collected and determined by an Authorised Body with reference to its Import and Export Meters (adjusted by meter amendments and the outcome of any disputes). <p>Savukārt domēna protokolā parādās punkts C.1.4., kas pasaka, ka “metering of the gross energy is performed at the injection point”, kas ir pretrunā ar EECS standartu, jo iespiešanas punkts vairs nevar būt Ražošanas iekārtas sastāvdaļa.</p>	<p>“Virtual gas meter” skaidrības labad ir dzēsts no domēna protokola vienlaikus bez izmaiņām Domēna protokolā teikts, ka definīcijas un intepretācijas, kuras tajā izmantotas ir skatāmas EECS noteikumu izpratnē.</p> <p>Atbilstoši spēkā esošajam tiesiskajam regulējumam un deleģējumam, šobrīd izcelsmes apliecinājumus iespējams izdot tikai sistēmā ievadītai gāzei, atbilstoši kompetentās mērinstitūcijas veiktajai gāzes uzskaitēi un kvalitātes kontrolei, atņemot ražošanas palīgiekārtu (Production Auxiliary) patēriņu.</p> <p>Gāzes uzskaitēi ārpus savstarpēji savienotās gāzes sistēmas ir nepieciešams regulējums un attiecīga nozīmētā kompetentā mērinstitūcija-</p>
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		Šis traktējums ir pretrunā arī ar Eiropas komisijas apstiprinātajām ilgtspējas oglekļa sertifikācijas shēmām, kurām piederības robežas ir skaidri norādītas (ražošanas iekārtu adresē) un ilgtspējas sertifikācija notiek pēc noteikumiem, kas pielīdzināmi EECS standartiem.	
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