

Country: Finland		Author: Finextra		
		Actual implementation in the MS	Comments	Instructions for assessment/explanations
Date: 2022/02/28				
GENERAL				
	Disclosure system implemented	YES		NO : No legislation and no system in place Almost in line: have a legislation in place but does not consider all elements required by the directive e.g. no environmental legislation YES : legislation in place + all elements disclosed
	- <i>Legislation</i>	By the Act on Guarantees of Origin for Energy (1050/2021) (Laki energian alkuperätakuista, unofficial translation: https://www.finlex.fi/en/laki/kaannokset/2021/en20211050.pdf) and in secondary legislation, by The Governmentl Decree on Guarantees of Origin for Energy (1081/2021) (Valtioneuvoston asetus energian alkuperätakuista, unofficial translation: https://www.finlex.fi/en/laki/kaannokset/2021/en20211081.pdf). This Act and Decree transpose Article 19 of (EU) 2018/2001 (RED II), (EU) 2019/944 (Internal Electricity Market Directive) and 2012/27/EU (Energy Efficiency Directive).		<i>Please name the relevant regulations and provide an internet reference (preferably a version in English)</i>
	- <i>When did the regulation(s) regarding disclosure come into force?</i>	The updated act and governmental decree came into force in December 2021. Disclosure has been required for electricity since 2004.		<i>Please name the date in which the regulation(s) came into force.</i>
	- <i>Competent Body (who is and since when?)</i>	Energy Authority		<i>Please specify and provide reference to legal nomination and the date since when the body was appointed</i>
	RE-GO system implemented	YES		NO : no secondary legislation and no system in place Almost inline : secondary legislation in place but no registry YES : Secondary legislation in place + registry

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- Competent Body (who is and since when?)	Fingrid since 1.3.2014 (for electricity)		<i>Please specify and provide reference to legal nomination and the date since when the body was appointed</i>
- Is the appointed Competent Body the only competent body in your domain for Gos (Who and When)?	No, Gasgrid Finland Oy (gas and hydrogen) and the Energy Authority (heating and cooling).		<i>Please specify</i>
CHP-GO system implemented	YES		<p>NO : no secondary legislation and no system in place Almost inline : secondary legislation in place but no registry YES : Secondary legislation in place + registry</p>

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	- Competent Body (who is and since when?)	Fingrid since 1.3.2014 for HEC, the Energy Authority 1.1.2022 for heating/cooling.		Please specify and provide reference to legal nomination and the date since when the body was appointed
	- Is the appointed Competent Body the only competent body in your domain for Gos (Who and When)?	No, Fingrid for HEC (electricity) and Energy Authority for heating/cooling.		Please specify and provide reference to legal nomination and the date since when the body was appointed
ID	Implementation of the elements of the Directive Related to GOs			
Definition				
	The sole function of a GO is the usage for disclosure purposes for final customers.	YES		YES: in the Domain GO is defined as such (electronic energy certificate that meets the requirement of the RES Directive for RE-GO) NO: in the Domain GO is not defined as such NA: No RE-GO system in place
Implementation of Article 15 of the Directive				
	Have you fully implemented the requirements of Art. 15 of the RES-Directive?	YES	REDII implemented	
	If not, please specify the ones which you have not implemented yet.			
ID	RE-DISS BPR			
12th Month Rule				
	Metered production periods for issuing GOs are not longer than a calendar month.	YES		NO : metered periods for issuing GOs are longer than a calendar year YES : If true Nota Bene : in case only RES GOs implemented only assess RES-GO system

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	Metered production periods for issuing GOs do not run across the start and end of disclosure periods. Longer intervals up to one year are acceptable for very small plants, for example.	YES		NO : Metered periods for issuing GO run across the start and end of disclosure periods. YES : If true Nota Bene : in case only RES GOs implemented only assess RES-GO system
	If possible, issuing of GOs is done DIRECTLY after the end of each production period (potential exemption PV)	YES	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.	NO : more than 6 months after the end of the production period Almost in line : between 3 and 6 months after the PP YES : within 3 months after the production period
	Lifetime of GO is limited to 12 months after the end of the production period.	YES		NO : is not true YES : is true Nota Bene: in case only RES GOs implemented only assess RES-GO system <i>In the description section, please identify if this is true for other GO systems in place as well</i>
	GOs that have reached this lifetime (and haven't been used for disclosure) are collected into the Residual Mix	YES		NO : is not true YES : is true Nota Bene: in case only RES GOs implemented only assess RES-GO system <i>In the description section, please identify if this is true for other GO systems in place as well</i>
	Cancellations of GO relating to production periods in a given year X which take place until a given deadline in year X+1 count for disclosure in year X. Later cancellations count for disclosure in year X+1. (In case that disclosure periods differ from the calendar year, the deadline is defined accordingly.)	YES		Answer is YES or NO Nota Bene : in case only RES GO is implemented only assess RES-GO system <i>Please provide details of the system in place in the Domain.</i>
	Deadline is set on 31 March X+1	YES		YES: Deadline is the stated one NO: Different Deadline <i>If other, Please state the deadline in the description column.</i>
	The same allocation rule applies for expired GO: The date of expiry thus determines the disclosure period for which information from expired GO will be used.	YES		Answer is YES or NO" Nota Bene : in case only RES GOs implemented only assess RES-GO system

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Usage of EECS				
	The implementation of GO in all countries in Europe is based on the European Energy Certificate System (EECS) operated by the Association of Issuing Bodies (AIB). In case that national GO systems are established outside the EECS, then EECS is at least used for transfers between registries.	YES		NO : transfers of GOs between registries are not done through EECS YES : transfers of GOs between registries are done through EECS
	Is the GO system in the country established exclusively according to EECS?	Almost in line		YES: If true Almost in Line: both national GO and EECS system NO: if not true
	Does the domain utilise the AIB Hub for international transfers?	YES		Yes: If true Almost in Line: also use other systems for transfer of GO besides the AIB Hub No: if not true
	In case that not all European countries are members of EECS, appropriate connections between the EECS system and non-EECS members as well as between different non-EECS members are to be established. These include inter alia procedures for assessing the reliability and accuracy of the GO issued in a certain country and interfaces for the electronic transfer of GO.	NO	The Energy Authority verifies the realibility and accuracy of non-EECS GOs. Non-EECSs are handled separately from the EECS-GO registry.	NO : no procedure to assess reliability and accuracy of GO YES : procedures in place to assess reliability and accuracy of GO
	Ex-domain cancellations of GO, where a GO is cancelled in one registry and a proof of cancellation is then transferred to another country in order to be used there for disclosure purposes, are only used if there is no possibility for a secure electronic transfer and if there is an agreement on such ex-domain cancellations between the competent bodies involved. Statistical information on all ex-domain cancellations are be made available in order to support Residual Mix calculations.	YES		NO : none of the two statements are true Almost in line : one of the statements is true YES : Both statements are true Nota Bene : in case only RES GOs implemented only assess RES-GO system
Issuing of GOs for different energy sources and generation technologies				
	GOs are issued only for the net generation of a power plant, i.e. gross generation minus the consumption of all auxiliaries related to the process of power production. For hydro power plants involving pumped storage this means that GOs are issued only for the net generation which can be attributed to natural inflow into the reservoir.	YES		NO : If not true YES : If true

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	Verification mechanisms are implemented for ongoing control of registered data (e.g. reaudits, random checks, etc.).	YES		NO : If not true YES : If true
	Correct accounting of RES share of combustion plants is assured by adequate measures (EECS Rules)	YES		NO : If not true YES : If true
	The competent body can correct errors in GOs it has issued before they are exported, and is the only one with this competence.	YES		NO : If not true YES : If true
	The GO system is extended beyond RES & cogeneration to all types of electricity generation.	NO	Nuclear GOs are issued.	NO : no extension YES : extension in place
	GOs are issued for all electricity production, unless an RTS applies for that production, e.g. for the disclosure of supported electricity	NO		NO : If not true YES : If true
	The Competent body has made the use of GOs mandatory for all electricity supplied to final consumers (full disclosure implemented).	NO		NO : If not true YES : If true
	All types of GO are handled in one comprehensive registry system per country. (For an exception see the coexistence of national GO systems and EECS)	NO	See above.	Almost in line: if more than one registry, but closely coordinated YES: one comprehensive registry NO: Different registries
	Technical changes to plants are registered as soon as is reasonably practicable.	YES		NO : If not true YES : If true
	GOs have no function in terms of target compliance and should not be used as support instrument. All GOs are linked to disclosure.	YES		YES : all GOs are linked to disclosure Almost in line : if at least RES GO system is linked with disclosure, but others not clearly NO : no GO system is linked to disclosure
	A GO is considered as being used only once it has been electronically cancelled.	YES		NO : If not true YES : If true
	After cancellation, no further cancellation, transfer or export of the given GO is possible	YES		NO : If not true YES : If true

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	After expiry, no further cancellation, transfer or export of the given GO is possible	YES		NO : If not true YES : If true
	An exported GO is marked as removed from the exporting registry	YES		NO : If not true YES : If true
	Processes in the registry excludes duplication of GOs.	YES		NO : If not true YES : If true
	Registries are audited on a regular basis.	YES		NO : If not true YES : If true
	If multiple certificates are to be issued, e.g. a GO for disclosure and a support certificate for management of a support system, then these are legally separated.	N/A		NO : not legally separated YES : legally separated NA: no multiple certificates
	This GO combines the functionalities of a RES-GO and a high efficiency cogeneration GO.	YES		NO : the GO does not combine both informations (lost of one information). YES : the GO combines both RES and CHP in one GO
	<u><i>GO as the unique "tracking certificate"</i></u>			
	GO is the only "tracking certificate" used. Any other tracking systems of a similar purpose and function as GO are closely coordinated with GO and eventually converted to GO.	YES	GO is the only tracking certificate for renewable and nuclear electricity. With FOS it is possible to use the known origin (own production/contract based tracking)	YES : GO is the only tracking certificate Almost in line : coordination between GO and other certificate NO : no coordination between the 2 systems
	Besides GO, only Reliable Tracking Systems (which may include contract based tracking) and the Residual Mix is available for usage for disclosure. No other tracking mechanisms are accepted.	YES		YES : GO + RM or GO + RM + RTS NO : GO + other tracking system which is not a RTS + (RM)
	Green power quality labels use GO as the unique tracking mechanism.	YES		either YES or NO or NA if no green power label
	<u><i>Recognition of GO imported from other countries</i></u>			

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	<p>European countries choose one of the two following options and apply it consistently for all foreign GO :</p> <ul style="list-style-type: none"> - Rejection of GOs only relates to the cancellation of GOs and subsequent use for disclosure purposes in the respective country and does not restrict the transfers of GOs between the registry of the considered country and the registries of their countries. This means that the decision about the recognition of a GO does not hinder its import into the considered country. - Rejection of GOs implies blocking their import to the national registry. 	YES	The decision about the recognition of a GO does not hinder its import into the considered country.	<p>YES : If one of the options is applied NO : If none of the options is applied NA : no rejection of GO foreseen in the legislation</p>
	The choice of one or the other option is transparent for all market parties and clearly communicated.	YES		<p>YES : If true NO : If not true NA : no rejection of GO foreseen in the legislation</p>
	Within the rules set by the respective Directives, European countries consider their criteria for the acceptance of imported GOs for purposes of disclosure.	Almost in line	The Energy Authority evaluates the acceptance of imported Gos.	<p>NO : no rejection criteria YES : Rejection criteria have been listed Almost in line : Rejection criteria being discussed</p>
	These criteria address imports at least from all EU member states, other members of the European Economic Area (EEA) and Switzerland. The parties to the Energy Community Treaty are considered as well, as soon as GO imports from these countries become relevant.	Yes	The Energy Authority evaluates the acceptance of imported Gos.	<p>NO :criteria do not address imports of GO YES :criteria address imports of GO</p>
	The criteria specify the electronic interfaces, data format and contents of GOs to be imported, which the respective country accepts for imports of GOs (such as the EECS Hub).	YES	GOs compatible with AIB hub can be imported with no further investigation.	<p>NO : criteria do not specify electronic interface, data format and contents of GO to be imported YES :criteria do specify electronic interface, data format and contents of GO to be imported</p>
	Conditions for the recognition of GOs from other countries are that they were issued based on Art. 15 of Directive 2009/28/EC or compatible national legislation, and that they meet the explicit requirements set in Art. 15, for example, regarding the information content of the GOs.	YES		<p>NO : If not true YES : If true</p>
	The recognition of GOs from other countries is rejected if these countries have not implemented an electricity disclosure system.	YES	The Energy Authority evaluates the acceptance of imported Gos.	<p>NO : If not true YES : If true</p>

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	The recognition of GOs from other countries is rejected if the country which has issued the GOs or the country which is exporting the GOs have not implemented appropriate measures which effectively avoid double counting of the attributes represented by the GOs. Such appropriate measures ensure the exclusivity of the GOs for representing the attributes of the underlying electricity generation, implement clear rules for disclosure, establish a proper Residual Mix or equivalent measures, and ensure their actual use. Furthermore, the appropriate measures ensure that attributes of exported GOs are subtracted from the Residual Mix of the exporting country and cannot be used for disclosure at any time in the issuing or the exporting country by explicit mechanisms, unless the GOs are re-imported and cancelled there.	YES	The Energy Authority evaluates the acceptance of imported Gos.	NO : If not true YES : If true Almost in line: if part of the measures are implemented
Disclosure Schemes and other Reliable Tracking Systems				
	Full disclosure schemes are implemented, including the disclosure of CO ₂ emissions and radioactive waste.	NO		YES or NO or Almost in line if only CO ₂ or Nuclear waste or other restriction (e.g. only provided on website and not with bills and information material) <i>In the description column please specify:</i> - If the answer is almost in line, please describe the attribute that is missing (or any other restriction). - Please insert the energy sources (fuels) that have to be distinguished. - Also specify if certain attributes are allocated as "unknown" share in the fuel mix?
	RTS (Reliable Tracking Systems) can comprise, where applicable: - Homogeneous disclosure mixes for regulated market segments where no choice of supplier or different products exists, - Support systems whose interaction with disclosure requires a certain allocation of the attributes of supported generation (e.g. a pro-rata allocation to all consumers in a country where RES electricity is supported by a feed-in tariff), - Contract based tracking	NO	GO is the only tracking certificate for renewable and nuclear electricity. With FOS it is possible to use the known origin (own production/contract based tracking)	NA YES : if true Almost in line NO is not allowed
Calculations of Residual Mixes				

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	Where a full-disclosure system has not been implemented in the country, the countries provide a Residual Mix (RM) as a default set of data for disclosure of energy volumes for which no attributes are available based on cancelled GO or based on other Reliable Tracking Systems. The use of uncorrected generation statistics (e.g. on national or UCTE, Nordel etc. levels) are avoided.	YES	Nordel organization no longer exists	YES : proper RM calculation, or fully explicit tracking system applied based on GO and RTS Almost in line : default set of data avoiding double counting of RES attributes; or fully explicit tracking system applies, but not fully based on GO and RTS NO : No RM
	The calculation of the Residual Mix follows the methodology developed in the RE-DISS project and taken over by the AIB.	YES		YES : use of RE-DISS European Residual mix or of RE-DISS national RM NO : no use of RE-DISS mixes
	The Competent body from my country cooperates with AIB in order to adjust the Residual Mix in reflection of cross-border transfers of physical energy, GO and RTS.	YES		YES : if true (including e.g. Data collection of RE-DISS) NO : if not true
	For purposes of this cross-border adjustment, the competent body uses data provided by RE-DISS. The competent body also supports the collection of input data for the related calculations by the AIB (and its consultant).	Almost in line		The focus is on the first part of the sentence YES : use of AIB RM data (RE-DISS methodology) Almost in line: use of EAM data (in case of deficit domains) NO : no use of AIB data NA : fully explicit disclosure system (without unknown shares)
	As a default, the Residual Mix is calculated on a national level. However, in case that electricity markets of several countries are closely integrated (e.g. in the Nordic region), a regional approach to the Residual Mix may be taken. This should only be done after an agreement has been concluded amongst all countries in this region which ensures a coordinated usage of the regional Residual Mix.	YES		YES : coordinated regional approach or national approach NO : uncoordinated regional approach or no RM NA
Contract based tracking				
	If contract based tracking (CBT) is allowed in a country, it is regulated clearly and declared in the domain protocol.	NA	CBT not allowed for RES. Only allowed for Non-RES. Not declared in Domain Protocol.	YES : true or CBT accepted NO : not true Almost in line : CBT exists and efforts have been made to regulate it NA : CBT not allowed

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	Such regulations ensure that - The rules of the tracking system are transparent and comprehensive and are clearly understood by all participants in the system. - Double counting of attributes and loss of disclosure information is minimised within the contract based tracking scheme and also in the interaction of the contract based tracking scheme to GO and other RTS (if applicable). As a precondition for this, the contract based tracking scheme is able to provide comprehensive statistics about the volumes and types of electricity attributes which are tracked through it. - The relevant information for disclosure purposes is available in time to meet the timing requirements	NA		YES : true NO : not true Almost in line : CBT exists and efforts have been made to regulate it NA : when CBT is not allowed
Timing of Disclosure				
	Electricity disclosure is based on calendar years.	YES		YES or NO Almost in line: if calendar year + another period can be chosen (ex. Financial year) <i>In the description column, if other period is used, please identify it: starting date-end date</i>
	The deadline for cancelling GO for purposes of disclosure in a given year X is 31 March of year X+1.	YES		Yes: Deadline is the stated one No: Different Deadline <i>If other, Please state the deadline in the description column.</i>
Further Recommendations on Disclosure				
	The relation between support schemes for RES & cogeneration on the one side and GO and disclosure schemes on the other side are clarified. Where necessary, the support schemes should be defined as RTS	YES		YES : clear allocation of supported attributes NO : no clear allocation of supported attributes Almost in line : not allowed NA : No legislation <i>In the description column please describe how supported energy is allocated to consumers in terms of disclosure.</i>
	If support schemes are using transferable certificates, then these certificates are separated from GO	N/A		NO : not legally separated YES : legally seperated NA: no multiple certficates

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	All electricity products offered by suppliers with claims regarding the origin of the energy (e.g. green or low-carbon power) are based exclusively on cancelled GO. No other tracking systems are allowed, with the exception of mechanisms defined by law, e.g. a pro-rata allocation of generation attributes to all consumers which is related to a support scheme.	YES		YES : only GOs accepted for green products NO : other TS accepted for green products NA : no green products on the market Almost in line : not allowed
	As required by Art. 3 (9) of the IEM Directive 2009/72/EC annual disclosure of the supplier mix on or with the bill is mandatory. This also includes information on environmental impacts.	YES		NO : annual disclosure of supplier mix is not mandatory on or with the energy bill and it does not include information on environmental parameters. YES : annual disclosure of supplier mix is mandatory on or with the energy bill and it does include information on environmental parameters Almost in line: annual disclosure of supplier mix is mandatory on or with the energy bill but it does not include information on environmental parameters NA : no disclosure system in place
	Suppliers offering two or more products which are differentiated regarding the origin of the energy are required to give product-related disclosure information to all their customers, including those which are buying the “default” remaining product of the supplier.	YES		YES or NO NA : no green products on the market Almost in line : only product mix is disclosed, but not the (mandatory) supplier mix
	There are clear rules for the claims which suppliers of e.g. green power can make towards their consumers. There are rules on how the “additionality” of such products can be measured (the effect which the product has on actually reducing the environmental impact of power generation), and suppliers are required to provide to consumers the rating of each product based on these rules.	NO		YES : clear rules on green products NO : no clear rules NA : no green products on the market Almost in line : not allowed
	Claims made by suppliers and consumers of green or other low-carbon energy relating to carbon emissions or carbon reductions are regulated clearly. These regulations avoid double counting of low-carbon energy in such claims. A decision is taken whether such claims should adequately reflect whether the energy purchased was “additional” or not.	NO		YES : clear rules on green products NO : no clear rules NA : no green products on the market Almost in line : not allowed

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	In case that suppliers are serving final consumers in several countries rules are developed and implemented consistently in the countries involved on whether the company disclosure mix of these suppliers relates to all consumers or only to those in a single country.	YES		For most countries Not Known (NK) applies if information cannot be found YES : clear rules on level of disclosure NO : known practices of international disclosure by suppliers Almost in line : some progress has been made NA : not allowed
	The following recommendations are followed with respect to the relation of disclosure to cooperation mechanisms (Art 6 - 11 of Directive 2009/28/EC):	YES		
	a) If EU MS or MS or any other country agree on Joint Projects, such agreements also clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the respective power plants	N/A		YES: If agreements for Joint Projects clarify the allocation of attributes NO: If the proposal is not true NA: No joint projects
	b) If EU MS agree on Joint Support Schemes, such agreements clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the power plants supported under these schemes	N/A		YES: If agreements for Joint Support Schemes clarify the allocation of attributes NO: If the proposal is not true NA: No joint projects

Information on the Recognition of GO				
Extra questions on recognition of GO				Instructions for assessment/explanations
	<i>Does the Domain treat imported GO as national GO when it comes to disclosure? If so, please specify.</i>	YES		NO: It treats imported GO differently from national issued GO in disclosure (for example: has criteria for accepting imported GO). YES: treats them equally "Almost in line" is not possible
	<i>Does the Domain have criteria in place for accepting foreign GO for disclosure?</i>	YES		YES : criteria in place NO : no criteria in place "Almost in line" is not possible NA : no rejection of GO foreseen in the legislation

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- If yes, please specify the criteria which are in place	The legislation refers to RED II. Energy Authority has published instructions according to which GOs compatible with AIB hub and AIB rules are imported and accepted without further investigation, except GOs from Switzerland that are not accepted by the law. The acceptance of GOs from outside AIB hub will be investigated separately. No decisions on rejection of GOs from certain MS have been made.		<i>Please state which criteria of Art. 15 (6) RES Directive are implemented: Electronic database in place One competent body appointed by law all GOs linked to disclosure CO₂ emissions and radioactive waste included in disclosure display transparent publication of disclosure information others, please specify</i>
<i>Since when do you have these criteria in place?</i>	September 2014		<i>Please specify</i>
<i>Are the criteria transparently published in your country?</i>	YES, published on Energy Authority's webpage (only in Finnish): http://www.energiavirasto.fi/en		<i>Please specify and indicate where those are published. If electronically please provide a link.</i>

Information on Environmental Parameters			
What are the data basis for disclosing CO ₂ emissions and radioactive waste when using GOs or other Reliable Tracking Systems for disclosing specific supplier mixes?	RM or based on own production or contracted supply. If other methods than RM is used, the customers must be informed on the methods used in calculation.		<i>Please describe how it is done in the Domain</i>

Information on Disclosure aspects			
Extra questions regarding the provision of disclosure information on a disclosure statement towards end consumers			Instructions for assessment/explanations

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Are there any regulations on graphical display of disclosure information by suppliers (requirements on how to display, fixed format of disclosure statement, ...)	NO		<i>Pls. Provide short explanation plus reference to website/regulation.</i>
Is there a requirement to provide comparison values besides supplier- and product mix? If so, which one (e.g. national production mix)	NO		<i>Pls. Provide short explanation plus reference to website/regulation.</i>
Is disclosure information somehow controlled by an official or independent institution? By whom? If so, is it audited or approved or calculated by that body?	Supervised by spot checks by Energy Authority, the suppliers calculate the disclosure information by themselves. Energy Authority publishes the RM.		<i>Pls. Provide short explanation plus reference to website/regulation.</i>
Is disclosure information of different suppliers centrally available (e.g. at the Competent Body, on a central website)?	YES, https://www.sahkonhinta.fi/		<i>Pls. Provide short explanation plus reference to website/regulation.</i>
Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.	NO		<i>Pls. Provide short explanation plus reference to website/regulation.</i>
Is there a specific regulation on disclosure of (high-efficient) CHP in your domain?	YES	In Finextra's DP	<i>Pls. Provide short explanation plus reference to website/regulation.</i>