

Finland	Electricity	Space for comments	
	Issuing body: Finextra Disclosure competent body: The Energy Authority		
	Actual implementation in the MS		Instructions for assessment/explanations
	14/05/2025		

Section A

Legislation

Implementation of Article 19 (8) of the Directive 2018/2001 and amended with 2023/2413

Have you fully implemented the requirements of Art. 19 (8) of Directive 2018/2001(EU) amended with 2023/2413(EU)			If GOs are cancelled for disclosure period 1.4.Y to 31.3.Y+1, is it required that GOs with a production period within those limits are used? Yes/No
- If not, please specify which elements you have not implemented yet.	Not yet Implementation of RED III has not yet started		Please specify

Timing of disclosure

Do the production period on the GO and the disclosure period coincide?	Yes		Yes/No
Are GOs valid for transactions for more than 12 months after the production of the energy unit?	No		Yes/No
- If yes, please specify			Please specify
Do GOs that have not been cancelled expire at the latest 18 months after the production of the energy unit?	Yes		Yes/No
- If no, please specify			Please specify
Are expired GOs collected into the Residual Mix (by fulfilling the statistic requirements of AIB)?	Yes		Yes/No
- If no, please specify			Please specify
When is the deadline for disclosure?	31 March year X+1		please specify; ex. 31 March Year X+1

Recognition of GOs from other countries

Do you have criteria in place for accepting foreign GO for disclosure?	Yes		Yes/No
- If yes: Are the criteria transparently published in your country?	Yes		Please specify and indicate where those are published. If electronically please provide a link.
Do you accept imported GOs for disclosure from all EU member states and other members of the European Economic Area (EEA)?	Yes		Yes/No
- If no, please name the countries from which you do not accept imported GOs for disclosure			Please specify
- If yes, please specify the reasoning for accepting	The GOs issued in accordance with the RED		Please specify
Do you accept imported GOs from parties to the Energy Community Treaty?	No		Yes/No
- If yes, please name the countries from which you do import			Please specify
- If yes, please specify the reasoning for accepting			Please specify
Do you accept for disclosure imported GOs from other countries than EU and EEA?	No		Yes/No. This question is merely oriented towards countries from EU and EEA, but others are welcome to fill in
- If yes, please name the countries from which you accept imported GOs for disclosure			Please specify
- If yes, please specify the reasoning for accepting			Please specify
Does the customer get information on the country of origin of the GOs in the disclosure statement?	Yes		Yes, please specify where and how/No

Energy Storage

Can storage prolong the lifetime of a GO for more than 12 month after the production of the energy unit?	No		Please describe
Does your system facilitate "Storage Issuance" (= cancel GOs for the input into storage and issue GOs for the storage output, with new production period?)	No		Yes/No
- If yes, do you provide separate cancellation statistics for energy that goes into storage?			Please describe
- If yes, do GO issuance statistics have a separate category for energy released from storage?			Please describe

Member States reporting to EC on GO statistics and renewable energy consumption			
Which principles do you use to report GO statistics and renewable energy consumption in Annex XVI of the Commission Implementing Regulation (EU) 2022/2299?	Principles defined in the Act and reporting template in question		Link to Commission Implementing Regulation
Do the reported figures differ from your published GO statistics?	No		Yes/No
- If yes, how do they differ?			Please describe
Do the reported figures differ from the reported consumption data for the annual residual mix exercise?	No		Yes/No
- If yes, how do they differ?			Please describe

Issuing and cancelling of Guarantees of Origin

Unit of energy represented by a GO			
Is the unit of a GO MWh?	Yes		Yes/No
Do you use smaller units than MWh for GOs?	No		Yes/No
Is the standard size for smaller size GOs equal to 1 Wh?	Not applicable		Yes/No
- If no: please specify			please specify

Usage of ex-domain cancellations			
Do you issue your GOs under the European Energy Certificate System (EECS) of AIB?	Yes		Yes/No
Do you allow for ex-domain cancellations, which means cancelling a GO in your registry for the usage in another registry?	Yes		Yes/No
- If yes, please describe under which conditions?	Not allowed to other AIB countries		please describe
- If yes, are ex-domain cancellations reported to the AIB for statistical purposes?	Yes		Yes/No
How do you ensure that GOs, cancelled for another domain, are not also claimed for consumption in your own domain?	The GO cancelled for another domain cannot be cancelled for our own domain. All cancellations for Finnish consumption are operated by the Issuing Body, which reports them to the Disclosure Competent Body		please describe

Production data sources			
What is the data source for production data?	Finnish Energy		Please specify
- If possible, link to data source	https://energia.fi/en/statistics/statistics-on-electricity/ and request for information		Please specify the website for the data source and which party is in charge
When are the statistics based on production measurement data available for calendar year X?	In May year x+1		Please specify yearly deadline
Is production data available with (sub)hourly granularity?	No		Yes/No
- If yes, which production categories?			Please specify
- If yes, what is the granularity of the data?			10mins/15mins/20mins/...
- If yes, how long after the production period is the data available?			Please specify

GO usage per system boundary			
Do you have rules in place that restrict the usage of GOs to a certain system boundary?	No		Yes /No (E.g. are there restrictions for where to use electricity GOs? Can hydrogen GOs be used for consumption from the natural gas grid? Can biomethane GOs be used for consumption from a hydrogen grid? Any specifics on vehicle transported gases? Restrictions on where heating and cooling GOs can be used? e.g. can heating and cooling GOs be exported? can they be used on another heating grid than where they were produced? etc)
- If yes, please specify			Please specify
Does your member state provide GO cancellation statistics for energy that changes dissemination level during its chain of custody?	No		Yes/No
Do you distinguish different types of GO cancellations: cancellations for final energy consumption vs. GO cancellation for input into energy carrier conversion, for storage, or other?	Yes: Cancellations for final energy consumption, conversion for gas and heating, ex-domain cancellation		Yes/No/Please specify
Does your member state provide statistics on GOs that are cancelled for input into energy carrier conversion (= for GO Conversion Issuance)?	No		Yes/No
Link to the detailed cancellation statistics	https://www.fingrid.fi/en/electricity-market-information/transactions-of-gos2/transactions-of-gos/		Please provide weblink

Disclosure

General			
Does your member state have a disclosure obligation for origin of supplied/comsumed energy?	Yes		Yes/No
- If yes, To which economic operators does it apply?	All electricity suppliers, producers and users that are marketing electricity produced from renewable energy resources or with nuclear power		Please specify (categories like: regulated suppliers, corporate consumers, all, ...)
- If yes, Under what rules it is governed?	Act on Guarantees of Origin for Energy (1050/2021)		Please name the relevant regulations and provide a reference (preferably a version in English)
who is the Competent Body in charge for the supervision of disclosure?	Energy Authority		Please specify name
- Under which legal nomination (law/decreet/decision) are they appointed as competent body?	Act on Guarantees of Origin for Energy (1050/2021)		Provide reference to legal nomination
Are GOs the only instrument for disclosing known origin in disclosure statements to final customers?	Yes		Yes/No
- If no, please specify the other instruments			Please specify
Which measures are in place for supervision of suppliers regarding their disclosure of the origin of the gas of their supply?			Gas only, please describe Yes/No.
Do suppliers submit samples of their invoices to the disclosure supervisor?	No		Disclosure supervisor for electricity : the authority supervising the obligation on suppliers to inform their clients about their supplier mix and product mix according to Electricity Directive 2019/944, Annex I, Article 5 Disclosure of energy sources.
Is there a public report on the result of the disclosure supervision?	No		Yes/No
- If yes, where can it be found?			Please specify
If a supplier is active in multiple Member States: does the supplier mix in your country/region account for this?	Yes		Yes/No
- If yes: how does this influence the supplier mix in your country/region?	Overall energy mix of the electricity sold by the electricity supplier over the preceding year have be provided also concerning electricity sold in the European Union if the electricity supplier operates in more than one Member State.		Please specify
Customer-specific disclosure			
Can a consumer cancel their own GOs?	Yes		Yes/No.
Can other parties than licensed suppliers cancel GOs?	Yes		Yes/No.
When offered energy products include claims on the origin of the energy, are they always exclusively based on cancelled GOs?	Yes		Yes/No
- If no: please specify			please specify: when are deviations possible, what are claims based on otherwise.
Calculations of Residual Mixes			
Gas only: Does your Member State calculate the residual mix for gases?			Yes/No
- If yes, which method is used to determine this?			Please specify
- If yes, who calculates the Residual Mix in your Member State?			Name of organisation
- Weblink to the results of the national publication of the residual mix			weblink or explanation from when onwards this is expected
Electricity only: Do you use the data of the Residual Mix calculated by the AIB?	Yes		Yes/No
- If no, please specify which data you use?			Please specify
Information on Disclosure communication			
Is the annual disclosure of the supplier mix displayed on the energy bill?	Yes		Yes/No
- If no, please specify where it is displayed.			Please describe
Is disclosure information of different suppliers centrally available (e.g. reports) ?	No		Pls. Provide short explanation plus reference to website/regulation.
If not, how is such consumption demonstrated and how is it reflected in the residual mix?	Consumption figure used in residual mix calculation is provided by the Finnish Energy (Finnish Energy association)		
Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.	No		Pls. Provide short explanation plus reference to website/regulation.
Consumption data			
What is the data source for consumption data?	Finnish Energy		Please specify

- If possible, link to data source	https://energia.fi/en/statistics/statistics-on-electricity/		Please specify the link to the data source
When are the statistics based on consumption measurement consumption data available for the calendar year X?	In May year x+1		Please specify

Timeline of disclosure

When is the residual mix communicated to suppliers?	By the end of the June of the following year.		Indicate approximate timing every year
When do suppliers provide disclosure figures (product mixes) to the disclosure authority?	Not applicable. Suppliers shall use the most recent residual mix no later than three months after its publication and publish the mixes according to the Act and the instructions of the Energy Authority.		Indicate approximate timing every year
When does the disclosure authority validate and publish the disclosure figures: product mixes, supplier mixes, other disclosure mixes (if applicable)?	Not applicable. The Energy Authority is the supervisory authority referred to in the Act and supervises compliance with the Act and the provisions issued under the Act as well as attends to the other duties laid down for it in the Act.		Indicate approximate timing every year
When do the suppliers inform their clients about the disclosure figures?	No later than three months after the publication of residual mix.		Indicate approximate timing every year. E.g., is it by the 1st September of year X+1 for disclosure figures of year X or another deadline?

Union Database (UDB) and disclosure supervision

Will a link between GO Registry and UDB be provided in your domain?			Yes/No
- If yes: which institution/authority will provide			Please provide name of institution/authority
Will the Disclosure Competent Body have access to the UDB?			Yes/No
What mechanism is in place for the interaction between the GO registry and the UDB?			Please describe
- If none yet, what ideas or plans are there regarding the future for this interaction between GOs and UDB?			Please describe
Is data from the Union Database for sustainable biofuels checked to confirm the location of renewable energy consumption?			Yes/No
- If yes, please describe the principles of this check			Please describe
Is a consistency check done regarding information in the UDB and the beneficiary of cancelled GOs for the same gas?			Please describe

Other issues

Full disclosure

Have you implemented a full disclosure system in your country?	No		Yes/No
- If yes, since when?			Please specify date of entry into force

Purposes of the GO

Do GOs have a function in terms of target compliance and are used as support instrument?	No		Yes/ No (in case all GOs are linked to disclosure)
Is a GO the only "tracking certificate" used?	Yes		Yes/No
- If no: Are any other tracking systems of a similar purpose and function as GO closely coordinated with GO?			
- If no: please name the other organisations active in the market (voluntary schemes/non governmental bodies/private initiatives), their role and the task they perform.			Please specify
Besides GO, is there only the Residual Mix available for usage for disclosure?	Yes		Yes/No (No meaning there are other tracking mechanisms accepted)
- If no, please specify			Please specify
Are GOs issued for self-consumed energy?	No		Yes/No
- If yes: what are the rules on disclosure for such GOs?			Please specify

Regulations on Power Purchase Agreements (PPAs)			
In terms of disclosure, how do you treat energy that is bought in a competitive setting or in a long-term power purchase agreement?	Same way as the others		Please describe
Who is responsible for disclosing/cancelling the GOs for competitive settings or long-term purchase agreements?	It depends on the kind of agreement they have made.		supplier/plant operator/customer? Please specify

Section B

Information on Environmental Parameters			
Does the supplier mix include information on environmental impacts?	Yes		Yes/No. Note the legal requirement for such information for electricity : Electricity Directive 2019/944, Annex I, Article 5(b)
Please indicate the data source for disclosing environmental information with the supplier mix?	An electricity supplier shall disclose at least once a year in or with electricity bills information on the quantity of carbon dioxide emissions and radioactive waste resulting from the energy sources used to produce the electricity sold by the electricity supplier over the preceding year.		Please describe how it is done in the Domain
Is there information on the guarantee of origin issued in your domain about meeting sustainability criteria and emission savings?	No		Yes/No
- If yes, in segments where compliance with sustainability and emission saving criteria is required (e.g. transport or heating), do you require that the supply (consumption) in this segment is confirmed by a GO?			Yes/No
- If not, how is such consumption demonstrated and how is it reflected in the residual mix?	Not applicable		please describe
How do you treat sustainability information in disclosure statements?	It can be added on a voluntary basis		please describe
Other Reliable Tracking Systems (RTS) and evidence of criteria-compliance like Proofs of Sustainability (PoS)			
Next to GOs, do you also allow other RTS as basis for Disclosure? (ex. Contract based tracking, Residual Mix, tradeable Proofs of Sustainability (PoS), etc)			Yes/No
- If yes, please describe			Please describe
- If yes, are they treated in a way that is legally separated from GOs?			Please describe
How do Proofs of Sustainability interact with the GO system?			Please specify if GO and PoS are either 1) issued separately (please describe), 2) may be connected on an integrated mechanism (please describe how), 3) always only on an integrated document or mechanism (please describe this mechanism), 4) other (please describe)
Do you prohibit statistical data to be used for determining the energy sources of energy obtained from exchanges?			Yes/No
- If no, under what circumstances do you allow statistical data to be used for determining the energy source of energy from an exchange?			Please describe
Do you prohibit statistical data to be used for determining the energy sources of imported energy?			Yes/No
- If no, under what circumstances do you allow statistical data to be used for determining the energy source of imported energy?			Please describe
Who is in charge of collecting statistics for Proofs of Sustainability (PoS) issued in your Domain?			Please specify
When are the PoS made available?			Please specify the time delay after the end of the energy production period, within which the PoS is made available.
Is it possible to separately issue a PoS and a GO for the same energy production?			Yes/No
- If no, how is this ensured that only one of the two instruments is provided to a producer?			Please describe
- If yes, can the PoS be allocated to a different consumer than the consumer for whom the GO is cancelled?			Please specify
- If only a PoS can be issued, how will you ensure that the new obligation for gas suppliers under RED III Article 19(8) is fulfilled?			Please specify
What measures prevent that a Proof of Sustainability is allocated to a different consumer than the GO that was issued for the same energy? (Double disclosure)			Please describe