

# MONITORING OF BIOGAS IN EU ETS PHASE 4

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Amanda Hagerman, Swedish EPA

# Monitoring of biogas in gas grids

## Revision of article 39, MRR

Allows for operators to claim the amount of biogas bought from a natural gas grid, not physically delivered to and combusted at the installation

➔ Condition: Certain requirements has to be fulfilled

Changes enter into force from 1 Jan 2022

At present: The actual used amount of biogas shall be monitored. *But* a derogation states analysis of the biogas fraction are *not* allowed if GO's has been issued for the biogas in the grid.

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## Revision of article 39, MRR

### **Article 39.3 states the derogation:**

Analyses or estimation methods shall not be used to determine the biomass fraction of gas received from a natural gas grid.

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## Revision of article 39, MRR

### **Article 39.4 describes the method and criteria:**

Purchase records may be used to determine the biomass fraction provided that certain criteras are fulfilled:

- No double counting of the same biogas quantity
- The operator and the producer of the biogas are connected to the same gas grid

The biogas shall comply with the RED-II criteria set out in article 38.

A database may be used to ensure compliance with the criteria

# Monitoring of biogas in gas grids

Revision of article 39, MRR

## Outcome in Sweden:

A most welcomed change to the MRR!



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### Outcome in Sweden:

#### Consequenses:

*Operator and producer of the biogas proved to be connected to the same gas grid* →

- Operators connected to local gas grids (e.g. Stockholm) are not able buy and claim biogas injected to the European gas grid
- If "connected" always should be interpreted as physically connected; for operator or producers which receives/delivers gas from/to a grid through intermediary technical steps (such as liquefaction) the article 39 cannot be applied



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### Outcome in Sweden:

#### Next steps:

- Identify features needed in a database to ensure compliance
- Identify which database is suitable
- Develop guidance to the verifiers and the operators
- Further analyse consequences to the ESR sector as well as clarify guidance in reporting of emissions.

# Open questions:

## Definitions:

- What are "the same gas grid"?
- Does "connected" always mean physically connected?

## Monitoring, reporting and verification:

- What documentation shall the CA ask for when approving the monitoring plan?
- What documentation are acceptable evidence to ensure there is no double counting?
- What documentation is needed to prove the biogas is injected into the same gas grid?

# Open questions:

## Biogas in the ESR and in other member states:

- What evidence should CA and the verifier ask for when biogas is bought from other MS?
- How do we ensure the same biogas quantity is not claimed in the ESR sector?

## Using a database as a tool for compliance:

- Is it possible to prove there is no double counting without using a database?
- What information and application would be needed in a database?



# Thank you for your attention!

**Amanda Hagerman**

**amanda.hagerman@swedishepa.se**

**Swedish Environmental Protection Agency**