

## EU ETS Annual Reporting

OPERATOR DETAILS	
Name of Operator:	GREEN MOUNTAIN AS AVDELING OSLO
Name of Installation:	OSL1-Enebakk datasenter
Address of Installation:	Granittveien 100, 1914 Ytre Enebakk
Unique ID:	3220.0051.01
GHG Permit Number:	2025.0092.T
Date(s) of relevant approved MP and period of validity for each plan:	Versjon 1, 03.02.2025
Approving Competent Authority:	Miljødirektoratet
Category:	A
Is the installation a 'low emitter'?	Yes
Annex 1 Activity:	Combustion

EMISSIONS DETAILS	
Reporting Year:	2024
Reference document:	Verifikasjonsid.2024.0478
Date of Emissions Report:	31.03.2025
Process Emissions in tCO <sub>2</sub> e:	
Combustion Emissions in tCO <sub>2</sub> e:	
Total Emissions in tCO <sub>2</sub> e:	
Combustion Source Streams:	Diesel
Process Source Streams:	NA
Methodology used:	Beregning
Emissions factors used:	Standardfaktorer
Changes to the Operator/ installation during the reporting year:	Installert nye generatorer.

SITE VERIFICATION DETAILS	
Operator/ Installation visited during verification:	Yes
Date(s) of visit(s):	21.02.2025

<b>Number of days on-site:</b>	1
<b>Name of EU ETS (lead) auditor(s)/ technical experts undertaking site visit(s):</b>	Geir Inge Øye
<b>AVR Article 31 and 32: Justification for not undertaking site visit</b>	NA
<b>AVR Article 34a: Justification for conducting a virtual site visit</b>	NA
<b>Date of written approval from Competent Authority for waive of site visit:</b>	NA

**COMPLIANCE WITH EU ETS RULES FOR EU ETS tCO2 DECLARED ABOVE**

<b>Monitoring Plan requirements met:</b>	Yes
<b>Permit conditions met:</b>	Yes
<b>EU Regulation on M&amp;R met:</b>	No Biodiesel er brukt på anlegget. Dette er ikke tatt med som kildestrøm i overvåkingsplanen. Se for øvrig Annex 1.

**COMPLIANCE WITH EU REGULATION ON A&V**

<b>Data verified in detail and back to source: (EU ETS AVR Article 14 &amp; Article 16(2)(g))</b>	Yes  If yes, was this part of site verification.... Yes
<b>Control activities are documented, implemented, maintained and effective to mitigate the inherent risks: (EU ETS AVR Article 14(b))</b>	Yes
<b>Procedures listed in monitoring plan are documented, implemented, maintained and effective to mitigate the inherent risks and control risks: (EU ETS AVR Article 14(c))</b>	Yes
<b>Data verification: (EU ETS AVR Article 16)</b>	Yes
<b>Correct application of monitoring methodology:</b>	Yes

(EU ETS AVR Article 17)	
Verification of methods applied for missing data: (EU ETS AVR Article 18)	No Ikke manglende data.
Uncertainty assessment: (EU ETS AVR Article 19)	Yes
Competent Authority (Annex 2) guidance on M&R met:	Yes
Previous year Non-Conformity(ies) corrected:	N/A
Changes etc. identified and not reported to the Competent Authority/included in updated MP:	N/A

**COMPLIANCE WITH THE MONITORING AND REPORTING PRINCIPLES**

Accuracy:	Yes
Completeness:	Yes
Consistency:	Yes
Comparability over time:	No Førstegangs verifikasjon. Utviding hvert år.
Transparency:	Yes
Integrity of methodology:	Yes
Continuous improvement:	Yes. See Annex 1 for recommendations.

**OPINION**

<b>OPINION - verified with comments:</b>	We have conducted a verification of the greenhouse gas data reported by the above Operator in its Annual Emissions Report as presented above. On the basis of the verification work undertaken (see Annex 2) these data are fairly stated, with the exception of:
Comments which qualify the opinion:	<p>1. Biodiesel er tatt i bruk i et testprosjekt uten å være innsøkt i overvåkingsplanen.</p> <p>2. Det mangler 300 liter innkjøpt diesel i rapporteringsgrunnlaget.</p> <p>3. Se for øvrig Annex 1.</p>

#### VERIFICATION TEAM

<b>Lead EU ETS Auditor:</b>	Helen Hoem
<b>EU ETS Auditor(s):</b>	Geir Inge Øye
<b>Technical Expert(s) (EU ETS Auditor):</b>	-
<b>Independent Reviewer:</b>	Benedicte Bergsbakk
<b>Technical Expert(s) (Independent Review):</b>	-

<b>Signed on behalf of Ecoxy AS:</b>	
<b>Name of authorised signatory:</b>	Benedicte Bergsbakk
<b>Date of Opinion:</b>	31.03.25

<b>Name of verifier:</b>	Ecoxy AS
<b>Contact Address:</b>	Julsundvegen 4, 6412 Molde. ets@ecoxy.no
<b>Date of verification contract:</b>	04.02.2025
<b>Is the verifier accredited or a certified natural person?</b>	Accredited
<b>Name of National AB or authority certifying the verifier:</b>	Norsk Akkreditering
<b>Accreditation/ Certification number:</b>	VV 003

**Verification Report - Emissions Trading System  
EU ETS Annual Reporting**

**OSL1-Enebakk datasenter**

**Annex 1A - Misstatements, Non-conformities, Non-compliances and Recommended Improvements**

**A. Scheme: Uncorrected Misstatements that were not corrected before issuance of the verification report Material?**

<b>A1</b>	EU ETS Installation	Biodiesel har blitt rapportert som vanlig diesel i utslippsrapporten. Ut fra fakturaunderlag (faktura DRIV 1063787.pdf) kan det se ut som det dreier seg om 6387 l biodiesel. Dette vil gi en overrapportering på 3 tonn CO <sub>2</sub> , siden biodiesel har lavere NCV og utslippsfaktor enn vanlig diesel. Overrapportering som utgjør 0,8% av totale utslipp. Ikke vesentlig. Henviser også til avvik C1.	No
<b>A2</b>	EU ETS Installation	For fakturanr 1111603 er det en feiltasting i overføring fra faktura til beregningsunderlaget. I fakturaen er det flere linjer med leveranser. En av linjene er på 3501 liter. I sin summering har operatør skrevet 3201 liter. Det blir dermed rapportert 300 liter for lite innkjøpt diesel. Underrapportering som utgjør 0,2% av totalt forbruk. Ikke vesentlig.	No
<b>A3</b>	-- select --		-- select --
<b>A4</b>	-- select --		-- select --
<b>A5</b>	-- select --		-- select --
<b>A6</b>	-- select --		-- select --
<b>A7</b>	-- select --		-- select --
<b>A8</b>	-- select --		-- select --
<b>A9</b>	-- select --		-- select --
<b>A10</b>	-- select --		-- select --

**B. Scheme: Uncorrected Non-conformities with approved Monitoring Plan including discrepancies between approved plan and actual sources, source streams and boundaries etc identified during verification Material?**

<b>B1</b>	EU ETS Installation	Det mangler måletagger på måleutstyret, iht OP kap 8. Ikke påvirkning på rapporterte data, ikke vesentlig.	No
<b>B2</b>	-- select --		-- select --
<b>B3</b>	-- select --		-- select --
<b>B4</b>	-- select --		-- select --
<b>B5</b>	-- select --		-- select --
<b>B6</b>	-- select --		-- select --
<b>B7</b>	-- select --		-- select --
<b>B8</b>	-- select --		-- select --
<b>B9</b>	-- select --		-- select --

<b>B10</b>	-- select --		-- select --
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<b>C. Scheme:</b>		<b>Uncorrected Non-compliances with MRR which were identified during verification</b>	<b>Material?</b>
<b>C1</b>	EU ETS Installation	Operatør oppgir at det har blitt gjort et pilotforsøk med biodiesel. Biodiesel er ikke tatt med som kildestrøm i overvåkingsplanen og rapportert som vanlig diesel. Avvik mot MRR art. 12. Avvik i OP, ikke vesentlig. Se vurdering av vesentlighet av påvirkning på utslipp i avvik A1.	No
<b>C2</b>	EU ETS Installation	Ifølge operatørs oversikt over installerte generatorer oversteg anlegget 20 MW innfyrt effekt i 2020. Det er ikke rapportert kvotepliktige utslipp for noen av de foregående årene. Avvik mot MRR art. 4. Ikke vesentlig for 2024-rapportering.	No
<b>C3</b>	-- select --		-- select --
<b>C4</b>	-- select --		-- select --
<b>C5</b>	-- select --		-- select --
<b>C6</b>	-- select --		-- select --
<b>C7</b>	-- select --		-- select --
<b>C8</b>	-- select --		-- select --
<b>C9</b>	-- select --		-- select --
<b>C10</b>	-- select --		-- select --

<b>D. Scheme:</b>		<b>Recommended Improvements, if any</b>
<b>D1</b>	EU ETS Installation	Ta med i måleutstyrstabell for lagerbeholdning i OP kap 8 hvilke type målere det er.
<b>D2</b>	-- select --	
<b>D3</b>	-- select --	
<b>D4</b>	-- select --	
<b>D5</b>	-- select --	
<b>D6</b>	-- select --	
<b>D7</b>	-- select --	
<b>D8</b>	-- select --	
<b>D9</b>	-- select --	
<b>D10</b>	-- select --	

<b>E. Scheme:</b>		<b>Prior year Non-conformities that have NOT been resolved.</b> <b>Any prior year Non-conformities reported in the previous Verification Report that have been resolved do not need to be listed here.</b>
<b>E1</b>	EU ETS Installation	NOT APPLICABLE
<b>E2</b>	-- select --	
<b>E3</b>	-- select --	
<b>E4</b>	-- select --	
<b>E5</b>	-- select --	
<b>E6</b>	-- select --	

<b>E7</b>	-- select --	
<b>E8</b>	-- select --	
<b>E9</b>	-- select --	
<b>E10</b>	-- select --	

## Annex 1B - Methodologies to close data gaps

### Scheme: EU ETS Installation

Was a data gap method required?	No
If Yes, was this approved by the competent authority before completion of the verification?	-- select --
If Yes, did the number of flights with data gaps exceed 5% of the annual reported flights?	-- select --
If No, -	
- was the method used conservative (If No, please provide more details)	-- select --
- did the method lead to a material misstatement (If Yes, please provide more details)	-- select --

### Scheme: EU ETS Installation

Was a data gap method required?	No
If Yes, was this approved by the competent authority before completion of the verification?	-- select --
If Yes, did the number of flights with data gaps exceed 5% of the annual reported flights?	-- select --
If No, -	
- was the method used conservative (If No, please provide more details)	-- select --
- did the method lead to a material misstatement (If Yes, please provide more details)	-- select --

**Verification Report - Emissions Trading System  
EU ETS Annual Reporting**

**OSL1-Enebakk datasenter**

**Annex 2 - Further information of relevance to the Opinion**

<b>Objectives and scope of the Verification:</b>	To verify the Operator's annual emissions to a reasonable level of assurance for the Annual Emissions Report (as summarised in the attached Opinion Statement) under the EU Emissions Trading System and to confirm compliance with approved monitoring requirements, approved monitoring plan and the EU Regulation on Monitoring and Reporting.
<b>Responsibilities:</b>	<p>The Operator is solely responsible for the preparation and reporting of their annual greenhouse gas (GHG) emissions for the purposes of the EU ETS in accordance with the rules and their approved monitoring plan (as listed in the attached Opinion Statement); for any information and assessments that support the reported data; for determining the installation's objectives in relation to GHG information and for establishing and maintaining appropriate procedures, performance management and internal control systems from which the reported information is derived.</p> <p>The Competent Authority is responsible for</p> <ul style="list-style-type: none"><li>- issuing and varying applicable permits to Operators or Aircraft Operators</li><li>- enforcing the requirements of Regulation EU no. 2018/2066 on monitoring and reporting (MRR) and any conditions of applicable permits;</li><li>- agreeing certain aspects of the verification process, e.g. site visit waivers;</li></ul> <p>In exceptional circumstances, including those stated in Article 70(1) and 70(2) of the MRR, the CA may determine an Operator's or Aircraft operator's emissions [tonne-kilometre data] for the purposes of the ETS.</p> <p>The Verifier (as named on the Opinion Statement) is responsible for, in accordance with its verification contract and Commission Regulation EU no. 2018/2067 on Accreditation and Verification, carrying out the verification of an Operator or Aircraft operator in the public interest, independent of the Operator or Aircraft operator and the competent authorities responsible for Directive 2003/87/EC. It is the responsibility of the Verifier to form an independent opinion, based on the examination of information and data presented in the Annual Emissions Report [Tonne-Kilometre Report], and to report that opinion to the Operator or Aircraft Operator. We also report if, in our opinion:</p> <ul style="list-style-type: none"><li>• the Annual Emissions Report [Tonne-Kilometre Report] is or may be associated with misstatements (omissions, misrepresentations or errors) or non-conformities; or</li><li>• the Operator is not complying with Regulation EU no. 2018/2066 on monitoring and reporting, even if the monitoring plan is approved by the competent authority.</li></ul>

<p><b>Work performed &amp; basis of the opinion:</b></p>	<ul style="list-style-type: none"> <li>• the EU ETS lead auditor/auditor has not received all the information and explanations that they require to conduct their examination to a reasonable level of assurance; or</li> <li>• improvements can be made to the Operator's performance in monitoring and reporting of emissions and/or compliance with the approved monitoring plan and Regulation EU no. 2018/2066 on monitoring and reporting.</li> </ul> <p>We conducted our examination having regard to the verification criteria reference documents outlined below. This involved examining, based upon our risk analysis, evidence to give us reasonable assurance that the amounts and disclosures relating to the data have been properly prepared in accordance with the Regulations and principles of the EU Emissions Trading System, as outlined in the EU ETS criteria reference documents below, and the Operator's approved monitoring plan. This also involved assessing where necessary estimates and judgements made by the Operator in preparing the data and considering the overall adequacy of the presentation of the data in the Annual Emissions Report and its potential for material misstatement.</p>
<p><b>Materiality level</b></p>	<p>Unless otherwise stated in Annex 1, the materiality level was 5% of the total reported emissions for the period subject to verification.</p> <p><i>Ifølge operatørs oversikt over installerte generatorer oversteg anlegget 20 MW innfyrt effekt i 2020. Det er ikke rapportert kvotepliktige utslipp for noen av de foregående årene.</i></p> <p>GHG quantification is subject to inherent uncertainty due to the designed capability of measurement instrumentation and testing methodologies and incomplete scientific knowledge used in the determination of emissions factors and global warming potentials</p>

<p>Reference documents cited :</p>	<p><b><u>Conduct of the Verification (1) - For Accredited Verifiers</u></b></p> <p>1) EU Regulation EU no. 2018/2067 on verification of data and the accreditation of verifiers pursuant to Directive 2003/87/EC..... (AVR)</p> <p>2) EN ISO 14065:2020 General principles and requirements for bodies validating and verifying environmental information</p> <p>3) EN ISO 14064-3:2019 Specification with guidance for the validation and verification of GHG assertions</p> <p>4) IAF MD 6:2014 International Accreditation Forum (IAF) Mandatory Document for the Application of ISO 14065:2013 (Issue 2, March 2014)</p> <p>5) Guidance developed by European Commission Services on verification and accreditation</p> <p>6) EA-6/03 European Co-operation for Accreditation Guidance For the Recognition of Verifiers under EU ETS Directive</p> <p>Member State-specific guidance is listed here:  Select Relevant guidance documents from the list  Select Relevant guidance documents from the list</p>
	<p><b><u>Rules etc of the EU ETS</u></b></p> <p>A) EC Regulation EU no. 2018/2066 on the Monitoring and Reporting of GHGs pursuant to Directive 2003/87/EC (MRR)</p> <p>B) EU Guidance developed by the European Commission Services to support the harmonised interpretation of the Monitoring and Reporting Regulation</p> <p>C) EU Guidance material developed by the European Commission Services to support the harmonised interpretation of the AVR</p> <p>D) need to insert any other national requirements/ guidance that are applicable</p>

Verification Opinion - Emissions Trading System  
EU ETS Annual Reporting

OSL1-Enebakk datasenter

Annex 3 - Summary of conditions / changes/ clarification / variations

A) approved by the Competent Authority but which have NOT been incorporated within a re-issued Permit/ Monitoring Plan at completion of verification

Scheme:		
1	EU ETS Installation	NOT APPLICABLE
2	-- select --	
3	-- select --	
4	-- select --	
5	-- select --	
6	-- select --	
7	-- select --	
8	-- select --	
9	-- select --	
10	-- select --	
11	-- select --	

B) identified by the verifier and which have NOT been reported by 31 December of the reporting year

Scheme:		
1	EU ETS Installation	NOT APPLICABLE
2	-- select --	
3	-- select --	
4	-- select --	
5	-- select --	
6	-- select --	
7	-- select --	
8	-- select --	
9	-- select --	
10	-- select --	
11	-- select --	