## Independent Reasonable Assurance Verification Report Opinion Statement - Emissions Trading System

### **EU ETS Annual Reporting**

OPERATOR DETAILS	
Name of Operator:	GREEN MOUNTAIN INNLANDET AS
Name of Installation:	OSL2-Hamar datasenter
Address of Installation:	Stabekkvegen 130, 2324 Vang På Hedmark
Unique ID:	3403.0219.01
GHG Permit Number:	2025.0063.T
Date(s) of relevant approved MP	Versjon 1, 27.01.2025
and period of validity for each	
plan:	
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.2024.0479	
Date of Emissions Report:	31.03.2025	
Process Emissions in tCO2e:	0	
Combustion Emissions in tCO2e:	6 620	
Total Emissions in tCO2e:	6 620	
Combustion Source Streams:	Diesel	
Process Source Streams:	NA	
Methodology used:	Beregning	
Emissions factors used:	Standardfaktorer	
Changes to the Operator/	Nytt anlegg. OSL-HAM startet opp drift i tre etapper i 2024. Første del startet	
installation during the reporting	opp i May, del to startet opp i august, og tredje del startet opp i October.	
year:		

SITE VERIFICATION DETAILS		
Operator/ Installation visited during verification:	Yes	
Date(s) of visit(s):	28.02.2025	

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

site visit:		
COMPLIANCE WIT	THE FILE OF THE FOR ELLETS 4002 DECLARED ABOVE	
COMPLIANCE WITH EU ETS RULES FOR EU ETS tCO2 DECLARED ABOVE		
Monitoring Plan requirements met:	No	
I wontoning Flan requirements met.	110	
	Inngående lagerbeholdning er ikke målt, som beskrevet i OP, men er sum av	
	påfylt mengde diesel i 2023.	
Permit conditions met:	Yes	
Ell Begulation on MCB moti	No	
EU Regulation on M&R met:	INO	
	Se Annex 1.	
COMPLIANCE WITH EU REGULATION	ON ON A&V	
Data verified in detail and back to	Yes	
source:		
(EU ETS AVR Article 14 & Article		
16(2)(g))		
( 7.6//	If yes, was this part of site verification	
	Yes	
	165	
	N/	
Control activities are	Yes	
documented, implemented,		
maintained and effective to		
mitigate the inherent risks:		
(EU ETS AVR Article 14(b))		
Procedures listed in monitoring	Yes	
plan are documented,		
implemented, maintained and		
effective to mitigate the inherent		
risks and control risks:		
(EU ETS AVR Article 14(c))		
Data verification:	Yes	
(EU ETS AVR Article 16)		
ľ		

Correct application of monitoring methodology:	No
(EU ETS AVR Article 17)	Inngående lagerbeholdning er ikke målt, som beskrevet i OP, men er sum av påfylt mengde diesel i 2023.
Verification of methods applied for missing data:	Yes
(EU ETS AVR Article 18)	
Uncertainty assessment: (EU ETS AVR Article 19)	Yes
Competent Authority (Annex 2) guidance on M&R met:	Yes
	D.V.A
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	VITH THE MONITORING AND REPORTING PRINCIPLES
Accuracy:	Yes
Completeness:	Yes
Consistency:	Yes
Comparability over time:	No
	Nytt anlegg i 2024.
Transparency:	Yes
Integrity of methodology:	Yes
Continuous improvement:	No, no improvements identified as required.

	OPINION
OPINION - verified with comments:	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:	1. Se annex 1.
	VERIFICATION TEAM
Lead EU ETS Auditor:	Helen Hoem
EU ETS Auditor(s):	Geir Inge Øye
Technical Expert(s) (EU ETS Auditor):	-
Independent Reviewer:	Benedicte Bergsbakk
Technical Expert(s) (Independent	-
Review):	
Signed on behalf of Ecoxy AS:  Name of authorised signatory:	Benedicte Bergsbakk
Date of Opinion:	31.03.25
Name of verifier:	Ecoxy AS
Contact Address:	Julsundvegen 4, 6412 Molde. ets@ecoxy.no
Date of verification contract:	04.02.2025
Is the verifier accredited or a	Accredited
certified natural person?	
Name of National AB or authority	Norsk Akkreditering
certifying the verifier:	
Accreditation/ Certification	VV 003
number:	

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

**OSL2-Hamar datasenter** 

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

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

A1		Det har vært byggeaktivitet i 2024 i forbindelse med oppføring av anlegget. Siden det ikke har vært mulig å skille hvilken diesel som har gått til kvotepliktig og ikke-kvotepliktig diesel i denne perioden har operatør valgt konservativ å rapportere all diesel som kvotepliktig. Dette har potensiale til å være en vesentlig overrapportering av kvotepliktige utslipp, men er den mest sikre måten å unngå underrapportering i denne situasjonen. Avviket vurderes derfor ikke som vesentlig.	No
A2	select		select
A3	select		select
A4	select		select
A5	select		select
A6	select		select
A7	select		select
A8	select		select
A9	select		select
A10	select		select

### B. Uncorrected Non-conformities with approved Monitoring Plan

Scheme: including discrepancies between approved plan and actual sources, source streams and boundaries etc identified during verification

Material?

		boundaries etc identified during verification	wateriar:
B1	EU ETS Installation	Inngående lagerbeholdning er ikke målt, men er sum av påfylt mengde diesel i 2023. Dette er konservativt, da noe av dieselen er brukt til bygningsstrøm osv i 2023, men er avvik siden det ikke er iht metoden beskrevet i OP kap 8. Vurderes av verifikatør som den mest nøyaktige metoden for IB med de dataene som er tilgjengelig, siden det ikke er gjort tankavlesninger før kjøring.	No
B2	select		select
B3	select		select
B4	select		select
B5	select		select
<b>B6</b>	select		select
<b>B</b> 7	select		select
B8	select		select
B9	select		select

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B10	select	select

C.	Scheme:	Uncorrected Non-compliances with MRR which were identified during verification	Material?
C1	EU ETS Installation	Detmangler målertagger på anlegget. Avvik mot MRR art. 59.3 og art. 60. Ikke påvirkning på rapporterte data, ikke vesentlig.	No
C2	EU ETS Installation	Det er brukt midlertidige generatorer og tilhørende tanker på anlegget i 2024 i forbindelse med oppføring av generatorbyggene. Det meste er brukt til byggestrøm o.l. men noe er også brukt til drift etter hva verifikatør forstår på operatør. Dette vil da være utslippskilder og tanker som ikke er tatt med i overvåkingsplanen. Avvik mot MRR art. 12 og 15. Alt midlertidig utstyr er fjernet før 31.12.2024. Ikke vesentlig pga alt forbruk er tatt med.	No
СЗ	EU ETS Installation	"Fuel used by liters" for hver måned i beregningsark "Grunnlag Forbruk basert på volum OSL-HAM" skal ifølge formel regnes ut ved diff mellom start og slutt av måneden og tatt høyde for påfylt. Kolonnen for påfylt mengde er ikke fylt ut, dermed blir utregningen feil og i noen tilfeller blir det et "negativt" forbruk hvis det er fylt på mer enn det er brukt. Disse verdiene benyttes ikke for kvoterapportering, og avviket er dermed ikke vesentilg, men det kan føre til forvirring og bør være riktig. Avvik mot MRR art. 67.	No
C4	select		select
C5	select		select
C6	select		select
C7	select		select
C8	select		select
C9	select		select
C10	select		select

D. Scheme: Recommended Improvements, if any

D1	EU ETS Installation	NOT APPLICABLE
D2	select	
D3	select	
D4	select	
D5	select	
D6	select	
D7	select	
D8	select	
D9	select	
D10	select	

E. Scheme: Prior year Non-conformities that have NOT been resolved.

Any prior year Non-conformities reported in the previous Verification Report that have been resolved do not need to be listed here.

E1	EU ETS Installation	NOT APPLICABLE
E2	select	
E3	select	
E4	select	
E5	select	
<b>E</b> 6	select	
<b>E</b> 7	select	
E8	select	
<b>E</b> 9	select	
E10	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

#### **OSL2-Hamar datasenter**

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

## Objectives and scope of the Verification:

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.

#### Responsibilities:

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.

The Competent Authority is responsible for

- issuing and varying applicable permits to Operators or Aircraft Operators
- enforcing the requirements of Regulation EU no. 2018/2066 on monitoring and reporting (MRR) and any conditions of applicable permits;
- agreeing certain aspects of the verification process, e.g. site visit waivers; 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.

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:

- the Annual Emissions Report [Tonne-Kilometre Report] is or may be associated with misstatements (omissions, misrepresentations or errors) or non-conformities; or
- 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.

## • 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

• 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.

## Work performed & basis of the opinion:

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.

#### Materiality level

Unless otherwise stated in Annex 1, the materiality level was 5% of the total reported emissions for the period subject to verification.

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

## Reference documents cited :

#### Reference documents | Conduct of the Verification (1) - For Accredited Verifiers

- 1) EU Regulation EU no. 2018/2067 on verification of data and the accreditation of verifiers pursuant to Directive 2003/87/EC..... (AVR)
- 2) EN ISO 14065:2020 General principles and requirements for bodies validating and verifying environmental information
- 3) EN ISO 14064-3:2019 Specification with guidance for the validation and verification of GHG assertions
- 4) IAF MD 6:2014 International Accreditation Forum (IAF) Mandatory Document for the Application of ISO 14065:2013 (Issue 2, March 2014)
- 5) Guidance developed by European Commission Services on verification and accreditation
- 6) EA-6/03 European Co-operation for Accreditation Guidance For the Recognition of Verifiers under EU ETS Directive

Member State-specific guidance is listed here:

Select Relevant guidance documents from the list

Select Relevant guidance documents from the list

#### Rules etc of the EU ETS

- A) EC Regulation EU no. 2018/2066 on the Monitoring and Reporting of GHGs pursuant to Directive 2003/87/EC (MRR)
- B) EU Guidance developed by the European Commission Services to support the harmonised interpretation of the Monitoring and Reporting Regulation
- C) EU Guidance material developed by the European Commission Services to support the harmonised interpretation of the AVR
- D) need to insert any other national requirements/ guidance that are applicable

# Verification Opinion - Emissions Trading System EU ETS Annual Reporting

### OSL2-Hamar 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	
	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	