



Headquarters,
Johnstown Castle Estate,
County Wexford, Ireland

GREENHOUSE GAS EMISSIONS PERMIT

Permit Register Number: IE-GHG176-10473-4

Operator: Waspar Limited
Stratus House, Unit 1, 1st Floor
College Business & Technology Park
Blanchardstown
Dublin 15

Installation Name: Waspar Limited

Site Name: Waspar Limited DUB10

Location: Unit 9
Blanchardstown Corporate Park
Blanchardstown
Dublin 15
Ireland

Introductory Note

This introductory note does not form a part of the Greenhouse Gas Emissions Permit.

This Greenhouse Gas Emissions Permit authorises the holder to undertake named activities resulting in emissions of Carbon Dioxide from the listed emission sources. It also contains requirements that must be met in respect of such emissions, including monitoring and reporting requirements. This Greenhouse Gas Emissions Permit places an obligation on the Operator to surrender allowances to the Agency equal to the annual reportable emissions of carbon dioxide equivalent from the installation in each calendar year, no later than four months after the end of each such year.

Contact with Agency:

If you contact the Agency about this Greenhouse Gas Emissions Permit please quote the following reference: Greenhouse Gas Emissions Permit N^o IE-GHG176-10473.

All correspondence in relation to this permit should be addressed to:

Email: help.ets@epa.ie

By Post: Climate Change Unit, Environmental Protection Agency
P.O. Box 3000, Johnstown Castle Estate,
Co. Wexford

Updating of the permit:

This Greenhouse Gas Emissions Permit may be updated by the Agency, subject to compliance with Condition 2. The current Greenhouse Gas Emissions Permit will normally be available on the Agency's website at www.epa.ie and [ETSWAP](#).

Surrender of the permit:

Before this Greenhouse Gas Emissions Permit can be wholly or partially surrendered, a written application must be made to the on-line ETS portal, and written permission received from, the Agency through [ETSWAP](#).

Transfer of the permit or part of the permit:

Before this Greenhouse Gas Emissions Permit can be wholly or partially transferred to another Operator a joint written application to transfer this Greenhouse Gas Emissions Permit must be made (by both the existing and proposed Operators) to, and written permission received from, the Agency through the on-line ETS portal [ETSWAP](#).

Licence held pursuant to the Environmental Protection Agency Act 1992, as amended. (as of the date of this permit):

Status Log

Current Permit

Permit number	Date application received	Date Permit issued	Comment
IE-GHG176-10473-4	09 December 2020	21 April 2021	1. Update of Operator Registered address. 2.Replacement Natural Gas Rotary flow meter added to Measurement Devices Table. 3.Role and responsibilities in Management Procedures updated.

Previous Permits

Permit number	Change Type	Date application received	Date Permit issued	Comment
IE-GHG176-10473-1	GHG Permit Application	10 October 2014	20 November 2014	
IE-GHG176-10473-2	GHG Variation	22 January 2015	27 March 2015	Update of Measurement Devices Table to include additional measurement devices for gas oil at each emission source and to include delivery truck meters; Update of Applied Tiers Table in relation to Natural gas and Gas Oil; Update of Application Details and Operator Details in relation to service contact, roles and responsibility and date of commencement of regulated activity; Update of Procedures in Management Section relating to roles and responsibility.
IE-GHG176-10473-3	GHG Variation	16 February 2016	12 August 2016	1. Changes to the methodology of calculating gas/diesel oil consumption. 2. Updating of Role and responsibilities in Management Procedures

End of Introductory Note

Glossary of Terms

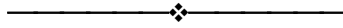
For the purposes of this permit the terms listed in the left hand column shall have the meaning given in the right hand column below:

The Agency	Environmental Protection Agency.
Agreement	Agreement in writing.
Allowance	Permission to emit to the atmosphere one tonne of carbon dioxide equivalent during a specified period issued for the purposes of Directive 2003/87/EC by the Agency or by a designated national competent authority of a Member State of the European Union.
Annual Reportable Emissions	Reportable Emissions of carbon dioxide made in any calendar year commencing from 1 January 2005 or the year of commencement of the activity, whichever is the later.
A & V Regulation	Commission Regulation (EU) No 600/2012 of 21 June 2012 on the verification of greenhouse gas emission reports and tonne-kilometre reports and the accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council and any amendments or revisions thereto.
Category A Installation	As defined in Article 19.2 (a) of the M&R Regulation.
Category B Installation	As defined in Article 19.2 (b) of the M&R Regulation.
Category C Installation	As defined in Article 19.2 (c) of the M&R Regulation.
The Directive	Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.
Emissions	The release of greenhouse gases into the atmosphere from sources in an installation.
EPA	Environmental Protection Agency.
Fall-Back Methodology	As defined in Article 22 of the M&R Regulation.
GHG	Greenhouse gas.
GHG Permit	Greenhouse gas emissions permit.
Greenhouse Gas	Any of the gases in Schedule 2 of the Regulations.
IPC/IE	Integrated Pollution Control/Industrial Emissions.
Installation	Any stationary technical unit where one or more activities listed in Schedule 1 to the Regulations are carried out. Also any other directly associated activities which have a technical connection with the activities carried out on that site and which could have an effect on emissions and pollution. References to an installation include references to part of an installation.

Installation with low emissions	As defined in Article 47 of the M&R Regulation.
Major Source Streams	As defined in Article 19.3 (c) of the M&R Regulation.
M&R Regulation	Commission Regulation (EU) No 601/2012 of 21 June 2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council and any amendments or revisions thereto.
Mis-statement	An omission, misrepresentation or error in the Operators reported data, not considering the uncertainty permissible pursuant to Article 12(1)(a) of Regulation (EU) no 601/2012.
N/A	Not applicable.
Monitoring Plan	The Plan submitted and approved in accordance with Condition 3.1 of this permit and attached at Appendix 1.
Non-conformity	Any act or omission by the Operator, either intentional or unintentional, that is contrary to the greenhouse gas emissions permit and the requirements of the Monitoring Plan.
The National Administrator	The person so designated in accordance with the requirements of any Regulations adopted as provided for under Article 19.3 of Directive 2003/87/EC.
The Operator (for the purposes of this permit)	Waspar Limited
“operator”	Any person who operates or controls an installation or to whom decisive economic power over the functioning of the installation has been delegated.
Person	Any natural or legal person.
Reportable emissions	The total releases to the atmosphere of carbon dioxide (expressed in tonnes of carbon dioxide equivalent) from the emission sources specified in Table 2 and arising from the Schedule 1 activities which are specified in Table 1.
The Regulations	European Communities (Greenhouse Gas Emissions Trading) Regulations 2012 (S.I. No 490 of 2012) and any amendments or revisions thereto.
The Verifier	A legal person or another legal entity carrying out verification activities pursuant to Regulation (EU) No 600/2012 and accredited by a national accreditation body pursuant to Regulation (EC) No 765/2008 and Regulation (EU) No 600/2012 or a natural person otherwise authorised, without prejudice to Article 5(2) of Regulation (EC) No 765/2008, at the time a verification report is issued.
The Registry	The Registry as provided for under Article 19 of Directive 2003/87/EC.

Schedule 1

Schedule 1 to the Regulations.



Reasons for the Decision

The Agency is satisfied, on the basis of the information available, that subject to compliance with the conditions of this permit, the Operator is capable of monitoring and reporting emissions in accordance with the requirements of the Regulations.

Activities Permitted

Pursuant to the Regulations the Agency issues this Greenhouse Gas Emissions Permit, subject to any subsequent revisions, corrections or modifications it deems appropriate, to:

The Operator:

Waspar Limited
Stratus House, Unit 1, 1st Floor
College Business & Technology Park
Blanchardstown
Dublin 15

Company Registration Number: 423801

to carry out the following

Categories of activity:

Annex 1 Activity
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

at the following installation(s):

Waspar Limited **Installation number:** 206992

located at

Unit 9
Blanchardstown Corporate Park
Blanchardstown
Dublin 15
Ireland

subject to the five conditions contained herein, with the reasons therefor and associated tables attached thereto.

Conditions

Condition 1. The Permitted Installation

- 1.1 This permit is being granted in substitution for the previous GHG permit granted to the Operator as listed in the Status Log of this GHG permit.
- 1.2 The Operator is authorised to undertake the activities and/or the directly associated activities specified in Table 1 below resulting in the emission of carbon dioxide:

Table 1 - Activities which are listed in Schedule 1 of the Regulations and other directly associated activities carried out on the site:

Installation No.: 206992

Activity Description
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
Directly Associated Activity Description
N/A

- 1.3 Carbon dioxide from Schedule 1 activities shall be emitted to atmosphere only from the emission sources as listed in Table 2 below:

Table 2 Emission Sources and Capacities:

Emission Source Reference	Emission Source Description	Capacity	Capacity Units
S1	GEN 01	<50	MW
S2	GEN 02	<50	MW
S3	GEN 03	<50	MW
S4	GEN 04	<50	MW
S5	GEN 05	<50	MW
S6	Boiler 1	<50	MW
S7	Boiler 2	<50	MW

- 1.4 The activity shall be controlled, operated and maintained so that emissions of carbon dioxide shall take place only as set out in this GHG Emissions Permit. The permit does not control emissions of gases other than carbon dioxide. All agreed plans, programmes and methodologies required to be carried out under the terms of this permit, become part of this permit.
- 1.5 This GHG Permit is for the purposes of GHG emissions permitting under the European Communities (Greenhouse Gas Emissions Trading) Regulations 2012 and any amendments to the same only and nothing in this permit shall be construed as negating the Operator's statutory obligations or requirements under any other enactments or regulations unless specifically amended by the Regulations.
- 1.6 Any reference in this permit to 'installation' shall mean the installation as described in the Greenhouse Gas Emissions Permit application and any amendments approved by the Agency.

Reason: To describe the installation and clarify the scope of this permit.

Condition 2. Notification

- 2.1 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in a change in:
- 2.1.1 the nature or functioning of the installation;
 - 2.1.2 the capacity of the installation as detailed in this permit;
 - 2.1.3 the fuels used at the installation;
 - 2.1.4 the range of activities to be carried out at the installation
- that may require updating of the GHG permit shall be carried out or commenced without prior notice to and without the prior written agreement of the Agency.
- 2.2 The Operator shall notify the Agency in writing of the cessation of all or part of any activity listed in Table 1 of this permit no later than one month from the date of cessation or by 31 December of the year of cessation, whichever is sooner.
- 2.3 The Operator shall apply for an update of this GHG Permit where there is a change to the Operator name and/or registered address of the Operator, within seven days of the change.
- 2.4 For installations or parts of installations which have not come into operation when the application for this permit was made the Operator shall notify the Agency of the date of commencement of the activity within seven days of commencement.
- 2.5 The Operator shall notify the Agency in writing within three days of becoming aware of any factors which may prevent compliance with the conditions of this permit.
- 2.6 The Operator shall submit to the Agency by 21 January of each year a declaration of operability. The declaration submitted shall be in the format required by the Agency.
- 2.7 All notifications required under Condition 2 above shall be made to the address given in the Explanatory Note included with this permit.

Reason: To provide for the notification of updated information on the activity.

Condition 3. Monitoring and Reporting

- 3.1 The Operator shall monitor and record greenhouse gas emissions on site in accordance with the M&R Regulation and the approved Monitoring Plan attached at Appendix 1 to this GHG permit and

in compliance with any other guidance approved by the Agency for the purposes of implementing the Directive and/or the Regulations.

3.2 The Operator shall modify the monitoring plan in any of the following situations:

- 3.2.1 new emissions occur due to new activities carried out or due to the use of new fuels or materials not yet contained in the monitoring plan;
- 3.2.2 the change of availability of data, due to the use of new measurement instrument types, sampling methods or analysis methods, or for other reasons, leads to higher accuracy in the determination of emissions;
- 3.2.3 data resulting from the previously applied monitoring methodology has been found incorrect;
- 3.2.4 changing the monitoring plan improves the accuracy of the reported data, unless this is technically not feasible or incurs unreasonable costs;
- 3.2.5 the monitoring plan is not in conformity with the requirements of the M&R Regulation and the Agency requests a change;
- 3.2.6 it is necessary to respond to the suggestions for improvement of the monitoring plan contained in the verification report.

The Operator shall notify any proposals for modification of the monitoring plan to the Agency without undue delay. Any significant modifications of the monitoring plan, as defined in Article 15 of the M&R Regulation, shall be subject to approval by the Agency. Where approved these changes shall be implemented within a timeframe agreed by the Agency.

3.3 Temporary changes to the monitoring methodology:

- 3.3.1 Where it is for technical reasons temporarily not feasible to apply the tier in the monitoring plan for the activity data or each calculation factor of a fuel or material stream as approved by the Agency, the Operator shall apply the highest achievable tier until the conditions for application of the tier approved in the monitoring plan have been restored. The Operator shall take all necessary measures to allow the prompt restoration of the tier in the approved monitoring plan. The Operator shall notify the temporary change to the monitoring methodology without undue delay to the Agency specifying:
 - (i) The reasons for the deviation from the tier;
 - (ii) in detail, the interim monitoring methodology applied by the Operator to determine the emissions until the conditions for the application of the tier in the monitoring plan have been restored;
 - (iii) the measures the Operator is taking to restore the conditions for the application of the tier in the approved monitoring plan;
 - (iv) the anticipated point in time when application of the approved tier will be resumed.
- 3.3.2 A record of all non-compliances with the approved monitoring plan shall be maintained on-site and shall be available on-site for inspection by authorised persons of the Agency and/or by the Verifier at all reasonable times.

3.4 The Operator shall appoint a Verifier to ensure that, before their submission, the reports required by Condition 3.5 below are verified in accordance with the criteria set out in Schedule 5 of the Regulations, the A&V Regulation and any more detailed requirements of the Agency.

3.5 The written report of the verified annual reportable emissions and the verification report in respect of each calendar year shall be submitted to the Agency by the Operator no later than 31 March of

the following year. The reports shall be in the format required by the Agency and meet the criteria set out in the M&R and A&V Regulations.

- 3.6 The Operator shall enter the verified annual reportable emissions figure for the preceding year into the Registry no later than 31 March of the following year. This figure shall be electronically approved by the Verifier in the registry no later than 31 March of each year.
- 3.7 Where an Operator is applying the Fall-Back methodology, the Operator shall assess and quantify each year the uncertainties of all parameters used for the determination of the annual emissions in accordance with the ISO Guide to the Expression of Uncertainty in Measurement or another equivalent internationally accepted standard and include the verified results in the written report of the verified annual reportable emissions to be submitted to the Agency by 31 March each year.
- 3.8 An Operator shall submit to the Agency for approval a report containing the information detailed in (i) or (ii) below, where appropriate, by the following deadlines:
- (a) for a category A installation, by 30 June every four years;
 - (b) for a category B installation, by 30 June every two years;
 - (c) for a category C installation, by 30 June every year.
- (i) Where the Operator does not apply at least the tiers required pursuant to the first subparagraph of Article 26(1) and to Article 41(1) of the M&R Regulation, the Operator shall provide a justification as to why it is technically not feasible or would incur unreasonable costs to apply the required tiers. Where evidence is found that measures needed for reaching those tiers have become technically feasible and do not incur unreasonable costs, the Operator shall notify the Agency of appropriate modifications to the monitoring plan and submit proposals for implementing appropriate measures and its timing.
- (ii) Where the Operator applies a fall-back monitoring methodology, the Operator shall provide a justification as to why it is technically not feasible or would incur unreasonable costs to apply at least tier 1 for one or more major or minor source streams. Where evidence is found that measures needed for reaching at least tier 1 for those source streams have become technically feasible and do not incur unreasonable costs, the Operator shall notify the Agency of appropriate modifications to the monitoring plan, submit proposals and a timeframe for implementing appropriate measures.
- 3.9 Where the verification report states outstanding non conformities, misstatements or recommendations for improvements the Operator shall submit a report to the Agency for approval by 30 June of the year in which the verification report is issued. This requirement does not apply to the Operator of an installation with low emissions where the verification report contains recommendations for improvements only. The report shall describe how and when the Operator has rectified or plans to rectify the non-conformities identified and to implement recommended improvements. Where recommended improvements would not lead to an improvement of the monitoring methodology this must be justified by the Operator. Where the recommended improvements would incur unreasonable costs the Operator shall provide evidence of the unreasonable nature of the costs. The Operator shall implement the improvements specified by the Agency in response to the report submitted in accordance with this Condition in accordance with a timeframe set by the Agency.
- 3.10 The Operator shall make available to the Verifier and to the Agency any information and data relating to emissions of carbon dioxide which are required in order to verify the reports referred to in Condition 3.5 above or as required by the Agency to facilitate it in establishing benchmarks and/or best practice guidance.
- 3.11 Provision shall also be made for the transfer of environmental information, in relation to this permit, to the Agency's computer system, as may be requested by the Agency.

- 3.12 The Operator shall retain all information as specified in the M&R Regulation for a period of at least 10 years after the submission of the relevant annual report.
- 3.13 A record of independent confirmation of capacities listed in this permit shall be available on-site for inspection by authorised persons of the Agency at all reasonable times.
- 3.14 The Operator shall keep records of all modifications of the monitoring plan. The records shall include the information specified in Article 16.3 of the M&R Regulation.
- 3.15 The Operator shall ensure that members of the public can view a copy of this permit and any reports submitted to the Agency in accordance with this permit at all reasonable times. This requirement shall be integrated with the requirements of any public information programme approved by the Agency in relation to any other permit or licence held by the Operator for the site.

Reason: To provide for monitoring and reporting in accordance with the Regulations.

Condition 4. Allowances

- 4.1 Surrender of Allowances
- 4.1.1 The Operator shall, by 30 April in each year, surrender to the Agency, or other appropriate body specified by the Agency, allowances equal to the annual reportable emissions in the preceding calendar year.
- 4.1.2 The number of allowances to be surrendered shall be the annual reportable emissions for the preceding calendar year plus such allowances as may be necessary to cover any earlier calendar year in respect of which allowances remain outstanding and due. This includes allowances to cover the amount of any annual reportable emissions in respect of which allowances were not surrendered in accordance with Condition 4.1.1 in the previous year, and the amount of any reportable emissions which were discovered during the previous year to have been unreported in reports submitted under Condition 3 in that or in earlier years.
- 4.1.3 In relation to activities or parts of activities which have ceased to take place and have been notified to the Agency in accordance with Condition 2.2 above, the Operator shall surrender to the Agency allowances equal to the annual reportable emissions from such activities in the preceding calendar year or part thereof, together with such allowances as may be necessary to cover any earlier calendar year in respect of which allowances remain outstanding and due as described in Condition 4.1.2 above.
- 4.1.4 The Operator may, from 2008 onwards, subject to the provisions of the Regulations and the relevant National Allocation Plan for that compliance year, surrender emission reduction units (ERUs) and certified emission reduction units (CERs) in place of allowances.
- 4.2 The holding, transfer, surrender and cancellation of allowances shall be in accordance with the requirements of any Regulations adopted as provided for under Article 19.3 of Directive 2003/87/EC, any amendment or revision to the same and any guidance issued by the Agency or the National Administrator.
- 4.3 The Operator shall provide the National Administrator with all the necessary information for the opening of an Operator holding account for the installation described in Condition 1 of this permit within twenty working days of the issue of this permit, unless such an account is already open.

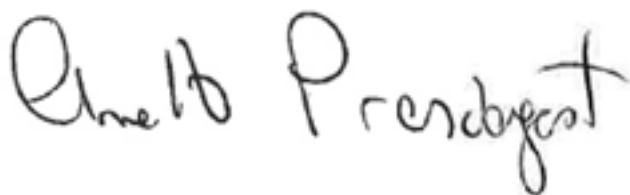
Reason: To provide for the surrendering, holding, transfer and cancellation of allowances in respect of reported emissions.

Condition 5. Penalties

5.1 Any Operator who fails to comply with Condition 4.1 above shall be subject to the provisions of the Regulations, including, but not limited to the payment of penalties.

Reason: To provide for the payment of excess emissions penalties as required under the Regulations.

Signed by the Authorised Person on this the 21 April 2021:



Ms. Annette Prendergast
Inspector/ Authorised Person

Appendix 1 to Greenhouse Gas Emissions Permit Number IE-GHG176-10473

Monitoring Plan

1. Guidelines & Conditions

1. Directive 2003/87/EC as amended by Directive 2009/29/EC (hereinafter "the (revised) EU ETS Directive") requires operators of installations which are included in the European Greenhouse Gas Emission Trading Scheme (the EU ETS) to hold a valid GHG emission permit issued by the relevant Competent Authority and to monitor and report their emissions and have the reports verified by an independent and accredited verifier.

The Directive can be downloaded from:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2003L0087:20090625:EN:PDF>

2. The Monitoring and Reporting Regulation (Commission Regulation (EU) No 601/2012) (hereinafter the "MRR") defines further requirements for monitoring and reporting.

The MRR can be downloaded from:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:181:0030:0104:EN:PDF>

Article 12 of the MRR sets out specific requirements for the content and submission of the monitoring plan and its updates. Article 12 outlines the importance of the Monitoring plan as follows:

The monitoring plan shall consist of a detailed complete and transparent documentation of the monitoring methodology of a specific installation [or aircraft operator] and shall contain at least the elements laid down in Annex I.

Furthermore Article 74(1) states:

Member States may require the operator and aircraft operator to use electronic templates or specific file formats for submission of monitoring plans and changes to the monitoring plan as well as for submission of annual emissions reports tonne-kilometre data reports verification reports and improvement reports. Those templates or file format specifications established by the Member States shall at least contain the information contained in electronic templates or file format specifications published by the Commission

3. All Commission guidance documents on the Monitoring and Reporting Regulation will be published at the link below as they become available:

http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm

(a) Information sources:

EU Websites:

EU-Legislation: <http://eur-lex.europa.eu/en/index.htm>

EU ETS general: http://ec.europa.eu/clima/policies/ets/index_en.htm

Monitoring and Reporting in the EU ETS: http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm

Environmental Protection Agency Website:

<http://www.epa.ie>

Environmental Protection Agency Contact:

GHGpermit@epa.ie

2. Application Details

The Installation Name, Site Name and the address of the site of the installation are detailed below. The Site Name and address can be updated from the Organisation Details Page on the ETSWAP website. The Installation Name can only be updated by your Competent Authority.

Installation name	Waspar Limited
Site name	Waspar Limited DUB10
Address	Unit 9 Blanchardstown Corporate Park Blanchardstown Dublin 15 Ireland

Grid reference of site main entrance	308405 E 241463 N
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Licence held pursuant to the Environmental Protection Agency Act 1992, as amended.	No
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Has the regulated activity commenced at the Installation? Yes

Date of Regulated Activity commencement	18 December 2006
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This information is only required to identify the first relevant reporting year of an installation. If the installation was in operation from the beginning of 2008 and held a Greenhouse Gas Emissions Permit from this point, 1 January 2008 will be used where the actual date of commencement is not readily known.

3. About the Operator

The information about the "Operator" is listed below. The "Operator" is defined as the person who it is proposed will have control over the relevant Regulated Activities in the installation in respect of which this application is being made.

(b) Operator Details

The name of the operator and where applicable the company registration number are detailed below. These details can only be updated by the Environmental Protection Agency.

Operator name Waspar Limited

Company Registration Number 423801

Operator Legal status

The legal status of the operator is: Company / Corporate Body

(c) Company / Corporate Body

Is the trading / business name different to the operator name? No

Registered office address

Address Line 1	Stratus House, Unit 1, 1st Floor
Address Line 2	College Business & Technology Park
City/Town	Blanchardstown
County	N/A
Postcode	Dublin 15

Principal office address

Is the principal office address different to the registered office address? No

Holding company

Does the company belong to a holding company? Yes

Holding company name Digital Realty Trust, Inc

Holding company address

Address Line 1	Four Embarcadero Center
Address Line 2	Suite 3200
City/Town	San Francisco
County	N/A
Postcode	CA 94111
Company registration number	26-0081711

Is the holding company principal address different to the holding company address? No

(d) Operator Authority

Does the operator named above have the authority and ability to:

- a. manage site operations through having day-to-day control of plant operation including the manner and rate of operation Yes
- b. ensure that permit conditions are effectively complied with Yes
- c. control monitor and report specified emissions Yes
- d. be responsible for trading in Allowances so that at the end of a reporting period allowances can be balanced against reported emissions. Yes

4. Service Contact

e. Service Contact

Address	Unit 9 Blanchardstown Corporate Park Blanchardstown Dublin 15 Ireland
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5. Installation Activities

f. Installation Description

Below is a description of the installation and its activities, a brief outline description of the site and the installation and the location of the installation on the site. The description also includes a non-technical summary of the activities carried out at the installation briefly describing each activity performed and the technical units used within each activity.

The site is a data centre located on the outskirts of Dublin. The main purpose of the site is to host data. The site is operated by Waspar Limited, a subsidiary of Digital Realty (UK) Limited. The installation captured by the EU ETS is a suite of standby generators. These units provide standby electricity generation capacity to power the data centre in the event of a power failure. The standby generators use diesel, and diesel combustion is one process operated by Waspar Limited on the site that gives rise to the production of carbon dioxide by the installation. Additional carbon dioxide emissions result from combustion of gas in boilers for space heating.

g. Annex 1 Activities

The table below lists the technical details for each Annex 1 activity carried out at the installation.

Note that 'capacity' in this context means:

- Rated thermal input (for combustion installations) which is defined as the rate at which fuel can be burned at the maximum continuous rating of the installation multiplied by the calorific value of the fuel and expressed as megawatts thermal.
- Production capacity for those specified Annex I activities for which production capacity determines ETS eligibility.

Annex 1 Activity	Total Capacity	Capacity units	Specified Emissions
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)	<50	MW	Carbon Dioxide

h. Site Diagram

The table below lists attachments (if available) that provide a simple diagram showing emissions sources source streams sampling points and metering/measurement equipment.

Attachment	Description
Unit 9 Blanchardstown Corp Park_Site plan with Gens and boilers CONFIDENTIAL.pdf	Site Map - CONFIDENTIAL

i. Estimated Annual Emissions

Detail of the estimated annual emission of CO₂ equivalent. This information enables categorisation of the installation in accordance with Article 19 of the MRR and is based on the average verified annual emissions of the previous trading period data OR if this data is not available or is inappropriate a conservative estimate of annual average emissions including transferred CO₂ excluding CO₂ from biomass.

Estimated Annual Emissions (tonnes CO_{2(e)}) 258.9

Justification for the use of a conservative estimate of CO₂ emissions. The Waspar Limited (DUB10) installation is estimated to emit <1% of the threshold for classification as an installation with low emissions, according to Article 47 of the MRR. As such, the use of a conservative estimate as opposed to the average verified annual emissions of the last trading period is believed to be justified.

Installation Category: A

6. Emissions Details

j. About your emissions

Annex I of the Monitoring and Reporting Regulations (MRR) requires that monitoring plans include a description of "the installation" and activities to be carried out and monitored including a list of emission sources and source streams. The information provided in this template relates to the Annex I activity(ies) comprised in the installation in question and should relate to a single installation. It includes any activities carried out by the operator and does not include related activities carried out by other operators.

k. Emission Sources

The table below lists all the emission sources at the installation, which may include directly associated activities/excluded activities.

Emission Source Reference	Emission Source Description
S1	GEN 01
S2	GEN 02
S3	GEN 03
S4	GEN 04
S5	GEN 05
S6	Boiler 1
S7	Boiler 2

The table below lists the emission sources which are linked to the Regulated Activities at the installation.

Emission Source Reference	Emission Source Description
S1	GEN 01
S2	GEN 02
S3	GEN 03
S4	GEN 04
S5	GEN 05
S6	Boiler 1
S7	Boiler 2

l. Emission Points

The table below lists all the emission points at the installation, which may include directly associated activities/excluded activities.

Emission Point Reference	Emission Point Description
EP1	GEN 01
EP2	GEN 02

Emission Point Reference	Emission Point Description
EP3	GEN 03
EP4	GEN 04
EP5	GEN 05
EP6	Boiler 1
EP7	Boiler 2

m. Source Streams (fuels and/or materials)

The table below lists the source streams which are used in Schedule 1 Activities at the installation.

Source Stream Reference	Source Stream Type	Source Stream Description
F1 (Gas Oil)	Combustion: Commercial standard fuels	Gas/Diesel Oil
F2 (Natural Gas)	Combustion: Other gaseous & liquid fuels	Natural Gas

n. Emissions Summary

The table below provides a summary of the emission source and source stream details in the installation.

Source streams (Fuel / Material)	Emission Source Refs.	Emission Point Refs.	Annex 1 Activity
F1 (Gas Oil)	S1,S2,S3,S4,S5	EP1,EP2,EP3,EP4,EP5	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
F2 (Natural Gas)	S6,S7	EP6,EP7	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

o. Excluded Activities

Certain activities that result in greenhouse gas emissions may be excluded under the EU ETS Directive for example truly mobile sources such as vehicle emissions.

Do you have any excluded activities which need to be identified in your monitoring plan? No

7. Low Emissions Eligibility

p. Low Emissions Eligibility

The operator may submit a simplified monitoring plan for an installation where no nitrous oxide activities are carried out and it can be demonstrated that:

(a) the average verified annual emissions of the installation during the previous trading period was less than 25 000 tonnes CO_{2(e)} per year or;

(b) where this data is not available or inappropriate a conservative estimate shows that emissions for the next 5 years will be less than 25 000 tonnes CO_{2(e)} per year.

Note: the above data shall include transferred CO₂ but exclude CO₂ stemming from biomass.

Does the installation satisfy the criteria for installations with low emissions (as defined by Article 47 of the MRR)? Yes

If the installation is an installation with low emissions as defined above there are a number of special provisions which may be applied to provide a simplified monitoring plan. These provisions are set out in Article 47 of the MRR.

8. Monitoring Approaches

q. Monitoring Approaches

Emissions may be determined using either a calculation based methodology ("calculation") or measurement based methodology ("measurement") except where the use of a specific methodology is mandatory according to the provisions of the MRR. [MRR Article 21].

Note: the operator may subject to competent authority approval combine measurement and calculation for different sources. The operator is required to ensure and demonstrate that neither gaps nor double counting of reportable emissions occurs.

Please specify whether or not you propose to apply the following monitoring approaches. Select all monitoring approaches that are applicable to you. The consecutive sections will become mandatory based on the selected approaches.

Calculation	Yes
Measurement	No
Fall-back approach	No
Monitoring of N ₂ O	No
Monitoring of PFC	No
Monitoring of transferred / inherent CO ₂	No

9. Calculation

r. Approach Description

The calculation approach including formulae used to determine annual CO₂ emissions:

F1 Source Stream 1 (gas/diesel oil): A simplified approach is taken in line with Article 47 of the MRR. The calculation approach in relation to gas oil used at the installation is as follows: The total quantity of diesel is determined from the monthly run hours recorded for each generator, then applying the run hours to the volume of fuel consumed per hour based on the manufacturer specification. This data is held on a spreadsheet covering the relevant reporting period and is filed, along with primary evidence within our Evidence Pack. As a back up, fuel level readings are manually taken from the ultrasonic diesel meter on a monthly basis and logged into the EU ETS Evidence Pack. The figures are crossed checked against any fuel delivery receipts for deliveries within the reporting period which is also taken into account in the calculation of the gas oil consumption. The determined fuel usage (Activity Data) is recorded in the reporting spreadsheet for the relevant year and converted from litres to tonnes using a standard density figure for gas oil. The CO₂ emissions are determined from the following calculation:

$$\text{CO}_2 = \text{Activity Data} \times \text{Net Calorific Value (NCV)} \times \text{Emission Factor (EF)} \times \text{Oxidation Factor (OxF)}$$

Where NCV, OxF and EF are taken from the latest EPA Ireland country-specific data release.

F2 Source Stream 2 (natural gas): A simplified approach is taken, in line with Article 47 of the MRR. MRR Article 26(3) states that for de minimis source streams (<1000 tonnes), operators may use conservative estimations rather than tiers for activity data and each calculation factor. A Tier 1 approach for fuel consumption, NCV derived from gas bills (Tier 2b) and the country specific emission factor for Natural Gas (Tier 2a) have been applied for Natural Gas at this installation. The calculation approach used at the installation for natural gas is as follows: Step 1: Read activity data from gas bills (KWh). Convert KWh by multiplying by the gross to net conversion factor, and then to TJ by multiplying by 3.6×10^{-6} . Step 2: Convert the annual actual gas volume to the standardised gas volume (Nm³). Step 3: Calculate the net calorific value of the fuel (TJ/Nm³). Step 4: Tonnes of CO₂ arising are calculated by multiplying the resulting NCV figure (TJ/Nm³) by the total standardised gas volume consumed in the reporting period (Nm³) by the current EPA Ireland country -specific Emission Factor (tCO₂/TJ) and by the Oxidation factor (1.0).

s. Measurement Devices

Below is a description of the specification and location of the measurement systems used for each source stream where emissions are determined by calculation

Also a description of all measurement devices including sub-meters and meters used to deduct non-Annex I activities to be used for each source and source stream.

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
F1 (Gas Oil)	S1	MD2	Ultrasonic meter	1 - 26	ft	N/A	Fuel tanks
F2 (Natural Gas)	S6,S7	MD1	Rotary meter	1.6 - 250	m3/h	2	On site
F1 (Gas Oil)	S2	MD3	Ultrasonic meter	1-26	ft	N/A	Fuel tanks
F1 (Gas Oil)	S3	MD4	Ultrasonic meter	1-26	ft	N/A	Fuel tanks
F1 (Gas Oil)	S4	MD5	Ultrasonic meter	1-26	ft	N/A	Fuel tanks
F1 (Gas Oil)	S5	MD6	Ultrasonic meter	1-26	ft	N/A	Fuel tanks
F1 (Gas Oil)	S1,S2,S3,S4,S5	MD7	Truck meters	N/A	litres	N/A	Trade partner trucks
F1 (Gas Oil)	S1,S2,S3,S4,S5	MD8 MD9 MD10 MD11 MD12	Run hour meters	N/A	Hours	N/A	On generators

Source Stream Refs.	Measurement Device Ref.	Determination Method	Instrument Under Control Of	Conditions Of Article 29(1) Satisfied	Invoices Used To Determine Amount Of Fuel Or Material	Trade Partner And Operator Independent
F1 (Gas Oil)	MD2	Continual	Operator	N/A	N/A	N/A
F2 (Natural Gas)	MD1	Continual	Trade partner	Yes	Yes	Yes
F1 (Gas Oil)	MD3	Continual	Operator	N/A	N/A	N/A
F1 (Gas Oil)	MD4	Continual	Operator	N/A	N/A	N/A
F1 (Gas Oil)	MD5	Continual	Operator	N/A	N/A	N/A
F1 (Gas Oil)	MD6	Continual	Operator	N/A	N/A	N/A

Source Stream Refs.	Measurement Device Ref.	Determination Method	Instrument Under Control Of	Conditions Of Article 29(1) Satisfied	Invoices Used To Determine Amount Of Fuel Or Material	Trade Partner And Operator Independent
F1 (Gas Oil)	MD7	Batch	Trade partner	Yes	Yes	Yes
F1 (Gas Oil)	MD8 MD9 MD10 MD11 MD12	Continual	Operator	N/A	N/A	N/A

t. Applied Tiers

The table below identifies the tiers applied against the relevant input data for each source stream and confirms whether a standard (MRR Article 24) or mass balance (MRR Article 25) approach is applied.

(i) The highest tiers as defined in Annex II of the MRR should be used by Category B and C installations to determine the activity data and each calculation factor (except the oxidation factor and conversion factor) for each major source stream. Category A installations should apply as a minimum the tiers listed in Annex V.

(ii) Operators may apply a tier one level lower than those referred to in sub paragraph (i) above for Category C installations and up to two levels lower for Category A and B installations with a minimum of tier 1 if the operator can demonstrate to the satisfaction of the competent authority that this is not technically feasible or would lead to unreasonable cost to apply the higher tier. The justification for not applying the higher tier should be recorded when completing the tier table.

(iii) The competent authority may allow an operator to apply even lower tiers than those referred to in the sub paragraph (ii) with a minimum of tier 1 for a transition period of up to three years if the operator can demonstrate to the satisfaction of the competent authority that this is not technically feasible or would lead to unreasonable cost to apply the higher tier and provides an improvement plan detailing how and by when at least the tier referred to in sub paragraph (ii) will be achieved. The improvement plan should be referenced in subsequent table and provided to the competent authority at the time of submission of this plan.

(iv) For minor source streams operators shall apply the highest tier which is technically feasible and will not lead to unreasonable costs with a minimum of tier 1 for activity data and each calculation factor. For de-minimis source streams operators may use conservative estimations rather than tiers unless a defined tier can be achieved without additional effort (MRR Article 26(2)).

(v) Installations with low emissions as identified in section 6(d) may apply as a minimum tier 1 for determining activity data and calculation factors for all source streams unless higher accuracy is achievable without additional effort.

* Note 1: For commercial standard fuels the minimum tiers listed in Annex V of the MRR may be applied for all activities in all installations.

* Note 2: If you are intending to apply a fall-back approach please complete the table below and select "n/a" for the tiers to be applied for each source stream where a fall-back approach is used. Section 10 "Fall-back" must also be completed for these source streams.

* Note 3: For biomass or mixed fuels the emission factor is the preliminary emission factor as defined in Definition 35 Article 3 of the MRR.

Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
F1 (Gas Oil)	S1,S2,S3,S4,S5	MD2, MD3, MD4, MD5, MD6, MD7, MD8, MD9, MD10, MD11, MD12	N/A	Standard	No tier	2a	2a	n/a	1	n/a	n/a	21.02	8.12	De-minimis	N/A	n/a	n/a
F2 (Natural Gas)	S6,S7	MD1	<7.5%	Standard	1	2b	2a	n/a	1	n/a	n/a	237.87	91.88	De-minimis	Yes	n/a	n/a

Total Estimated Emissions for Calculation (tonnes CO_{2(e)})

258.89

u. Applied tiers

Applied tiers for each source stream

Source Stream Ref.	Emission Source Refs.	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied
F1 (Gas Oil)	S1,S2,S3,S4,S5	No tier	2a	2a	n/a	1	n/a	n/a
F2 (Natural Gas)	S6,S7	1	2b	2a	n/a	1	n/a	n/a

v. Justification for Applied tiers

Justifications for the applied tiers for each major source stream where highest tiers are not currently achieved.

Source Stream Ref.	Emission Source Refs.	Justification for the applied tier	Improvement Plan Reference (where applicable)
N/A	N/A	N/A	N/A

10. Calculation Factors

w. Default Values

The table below lists, for each parameter, where default values are to be used for calculation factors.

Source Stream Refs.	Emission Source Refs.	Parameter	Reference Source	Default Value applied (where appropriate)
F1 (Gas Oil)	S1,S2,S3,S4,S5	NCV and Emission Factor	Ireland's National Greenhouse Gas Inventory	n/a
F2 (Natural Gas)	S6,S7	EF	Ireland's National Greenhouse Gas Inventory	n/a
F1 (Gas Oil),F2 (Natural Gas)	S1,S2,S3,S4,S5,S6,S7	OxF	MRR	1.0

Sampling and Analysis

Do you undertake sampling and analysis of any of the parameters used in the calculation of your CO₂ emissions? No

11. Management

x. Monitoring and Reporting Responsibilities

Responsibilities for monitoring and reporting emissions from the installation are listed below:

Relevant job titles/posts and provide a succinct summary of their role relevant to monitoring and reporting are listed below.

Job Title / Post	Responsibilities
Director Sustainability & Operational Risk	Overall EU ETS program management ; Responsible for permit sign-off and annual EU ETS emissions report for Waspar Limited (DUB10);Primary contact with 3rd party agencies; Collection, consolidation and submission of regional data; Periodic review (and update) for Policies and Procedures
Senior Real Estate Manager	Day-to-day site implementation and compliance with EU ETS; Collection and consolidation of site level data;Enforcement of Technical Policies and Procedures; Maintenance of monitoring infrastructure;Periodic progress review;Sign off of annual site emissions report; Management of Policy and Procedure variations; Site level communication and stakeholder engagement

Attachment	Description
N/A	N/A

y. Assignment of Responsibilities

Details of the procedure used for managing the assignment of responsibilities for monitoring and reporting within the installation and for managing the competencies of responsible personnel in accordance with Article 58(3)(c) of the MRR:

This procedure identifies how the monitoring and reporting responsibilities for the roles identified above are assigned and how training and reviews are undertaken.

<p>Title of procedure</p> <p>Reference for procedure</p> <p>Diagram reference</p> <p>Brief description of procedure. The description should cover the essential parameters and operations performed</p>	<p>EU ETS Procedure 1: Assignment of Responsibilities</p> <p>EUETSP1</p> <p>N/A</p> <p>The Director Sustainability & Operational Risk assigns responsibilities for monitoring and reporting to the Senior Real Estate Manager, who is responsible for day-to-day compliance and who delegates specific tasks to facilities managers and consultants according to the competencies required for each task. The Senior Real Estate Manager with consultant support carries out internal review and validation of data, ensuring that corrections and corrective actions are identified and actioned as appropriate.</p> <p>The Director Sustainability & Operational Risk reviews the performance of the Senior Real Estate Manager on an annual basis, ensuring that the Senior Real Estate Manager has the appropriate skills and competencies to fulfil their role, appropriate to the scale and complexity of the portfolio. Training needs are considered as part of the review, and additional resources provided as appropriate, e.g. consultancy support.</p> <p>In turn, the Senior Real Estate Manager reviews the performance of the facilities managers and any consultants who have delegated responsibilities, considering the skills and competencies required for the fulfilment of their role and identifying training requirements as appropriate.</p>
<p>Post or department responsible for the procedure and for any data generated</p> <p>Location where records are kept</p>	<p>Director Sustainability & Operational Risk</p> <p>Digital Realty’s EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.</p>
<p>Name of IT system used</p> <p>List of EN or other standards applied</p>	<p>N/A</p> <p>N/A</p>

z. Monitoring Plan Appropriateness

Details of the procedure used for regular evaluation of the monitoring plan's appropriateness covering in particular any potential measures for the improvement of the monitoring methodology:

Title of procedure	EU ETS Procedure 2: Monitoring Plan Appropriateness
Reference for procedure	EUETSP2
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The monitoring plan is evaluated by the Senior Real Estate Manager on an annual basis; and in the case of any potential changes to emissions sources and source streams (e.g. the installation or removal of new heating or generators). The Senior Real Estate Manager notifies the Director Sustainability & Operational Risk and the Digital Realty's consultants. At this stage, consideration is also given to potential measures for improvement of the monitoring methodology. Following the review by the Senior Real Estate Manager, the Director Sustainability & Operational Risk with consultancy support reviews the monitoring plan to ensure that the list of emissions sources and source streams is complete and reflects any changes to the nature and functioning of the installation.
Post or department responsible for the procedure and for any data generated	Senior Real Estate Manager
Location where records are kept	Digital Realty's EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.
Name of IT system used	N/A
List of EN or other standards applied	N/A

aa. Data Flow Activities

Details of the procedures used to manage data flow activities in accordance with Article 57 of the MRR:

Title of procedure	EU ETS Procedure 3: Data Flow Activities
Reference for procedure	EUETSP3
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Source Stream 1 (gas/diesel oil):- The quantity of gas oil consumed is determined by the following methodology: the run hours of each generator is recorded at least monthly and stored in a designated folder on the Digital Realty IT system. Using the manufacturer specification details on fuel use at 100% load i.e. litres/hour and the total run hours in the reporting period, the quantity of fuel consumed through each generator is calculated. The fuel consumed from each generator is added together to give a total quantity of fuel consumed. As a cross check backup fuel delivery invoices (including the quantity of fuel in litres) are scanned upon receipt and saved into our EU ETS Evidence Pack. For any temporary equipment used, delivery invoices will be used to determined quantities of fuel consumed. In

addition, the quantity of fuel from each delivery is reviewed and entered into an Excel spreadsheet and totalled for the reporting period. The total consumption figure in litres is converted to tonnes of gas oil using a standard density figure for gas oil. CO2 emissions arising are then calculated using Ireland's specific NCV, emission factor and oxidation factors for diesel/gas oil. The resulting figure is reviewed by the Director Sustainability & Operational Risk and consultants, and is entered into the annual emissions report.

Source Stream 2 (natural gas):-An annual consumption report is requested from the gas supplier, covering fuel consumption for the reporting period. This figure is checked against invoices for the reporting period. The total consumption figure (kWh) is multiplied by a gross to net conversion factor and then by 3.6×10^{-6} to convert to TJ. The NCV(TJ/Nm³) is calculated having converted the volume to standardised gas volume. The resulting NCV figure (TJ/Nm³) is multiplied by the standardised volume of natural gas consumed (Nm³) to calculate the total TJ. The total TJ is multiplied by the country specific Emission Factor (tCO₂/TJ) for Natural Gas and by the Oxidation Factor (1.0) and the resulting tonnes CO₂ arising is entered into the annual emissions report. The annual emissions report is reviewed by the Director Sustainability & Operational Risk.

Post or department responsible for the procedure and for any data generated	Director Sustainability & Operational Risk
Location where records are kept	Digital Realty's EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.
Name of IT system used	N/A
List of EN or other standards applied	N/A
List of primary data sources	Run hours, diesel / gas oil delivery invoices, stock estimations, annual consumption report and gas invoices
Description of the relevant processing steps for each specific data flow activity.	Each step is described in the procedure description above. Emissions are calculated using the standard formula: Emissions (t) = activity data (Nm ³ or l or t) x NCV (TJ/Nm ³ or TJ/t) x Emissions Factor (tCO ₂ /TJ) X Oxidation Factor
Identify each step in the data flow and include the formulas and data used to determine emissions from the primary data. Include details of any relevant electronic data processing and storage systems and other inputs (including manual inputs) and confirm how outputs of data flow activities are recorded	
Submit relevant documents to record data flow activities	

Attachment	Description
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Attachment	Description
N/A	N/A

bb. Assessing and Controlling Risks

Details of the procedures used to assess inherent risks and control risks in accordance with Article 58 of the MRR:

Title of procedure	EU ETS Procedure 4: Assessing and Controlling Risks
Reference for procedure	EUETSP4
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Risks associated with combustion activities are assessed as part of the annual review process, taking into consideration the activities on site and the associated emissions. Associated controls are also assessed to ensure that they are adequate to effectively control identified risks. One such risk is misstatement of data in the annual emissions report. This risk is controlled by the procedures EUETSP1, 2 and 3; namely those for assignment of responsibilities, monitoring plan appropriateness, and data flow activities.
Post or department responsible for the procedure and for any data generated	Director Sustainability & Operational Risk
Location where records are kept	Digital Realty’s EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.
Name of IT system used	N/A
List of EN or other standards applied	N/A

cc. Quality Assurance of Metering / Measuring Equipment

Details of the procedures used to ensure quality assurance of measuring equipment in accordance with Article 58 and 59 of the MRR.

Title of procedure	EU ETS Procedure 5: Quality Assurance of Metering / Measuring Equipment
Reference for procedure	EUETSP5
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Metering equipment for Source Streams 1 and 2 (in this case the run hour meters, ultrasonic diesel meter and the main site gas meter) is checked periodically in accordance with the MRR and proportionate to the risks involved. The Senior Real Estate Manager and consultants check the consumption data on an annual basis in order to ensure that consumption data is consistent. Where inconsistencies are found, utilities providers and facilities managers are engaged in order to understand the causes and put in place appropriate corrective action.

Post or department responsible for the procedure and for any data generated	Senior Real Estate Manager
Location where records are kept	Digital Realty's EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.
Name of IT system used	N/A
List of EN or other standards applied	N/A

dd. Quality Assurance of Information Technology used for Data Flow Activities

Details of the procedures used to ensure quality assurance of information technology used for data flow activities in accordance with Article 58 and 60 of the MRR:

Title of procedure	EU ETS Procedure 6: Quality Assurance of Information Technology used for Data Flow Activities
Reference for procedure	EUETSP6
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	All data associated with measuring and control of combustion activities is held on Digital Realty's IT system and in their EU ETS Evidence Pack. As a global data centre provider, IT systems are business critical backup systems and detailed backup, recovery systems, security policies and continuity plans are in place reflecting this. These policies and procedures are available on request.
Post or department responsible for the procedure and for any data generated	Senior Real Estate Manager
Location where records are kept	Digital Realty's EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.
Name of IT system used	N/A
List of EN or other standards applied	N/A

ee. Review and Validation of Data

Details of the procedures used to ensure regular internal reviews and validation of data in accordance with Articles 58 and 62 of the MRR.

Title of procedure	EU ETS Procedure 7: Review and Validation of Data
Reference for procedure	EUETSP7
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The Senior Real Estate Manager compiles consumption data with the assistance of facilities managers, with support from consultants. The data is checked on a regular basis, to ensure that: Data is complete; Data is consistent with that reported in previous periods; Data from different data collection methods is consistent (e.g. data from annual consumption report checked with invoice estimate). Emissions calculation factors are reviewed on an annual

basis to ensure that the factors used are consistent.

The Senior Real Estate Manager, with support from consultants, reviews emissions data when reviewing the annual emissions report.

Post or department responsible for the procedure and for any data generated
 Location where records are kept
 Name of IT system used
 List of EN or other standards applied

Senior Real Estate Manager
 Digital Realty’s EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.
 N/A
 N/A

ff. Corrections and Corrective Actions

Details of the procedures used to handle corrections and corrective actions in accordance with Articles 58 and 63 of the MRR:

Title of procedure
 Reference for procedure
 Diagram reference
 Brief description of procedure. The description should cover the essential parameters and operations performed
 Post or department responsible for the procedure and for any data generated
 Location where records are kept
 Name of IT system used
 List of EN or other standards applied

EU ETS Procedure 8: Corrections and Corrective Actions
 EUETSP8
 N/A
 If inconsistencies are found, utilities providers and facilities managers are engaged in order to understand the causes, make appropriate corrections and put in place appropriate corrective action. Corrections and corrective actions are addressed in a way commensurate to the inherent risks and control risks associated with combustion activities.
 Senior Real Estate Manager
 Digital Realty’s EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.
 N/A
 N/A

gg. Control of Outsourced Activities

Details of the procedures used to control outsourced processes in accordance with Articles 59 and 64 of the MRR.

Title of procedure
 Reference for procedure
 Diagram reference
 Brief description of procedure. The description should cover the essential parameters and operations performed

EU ETS Procedure 9: Control of Outsourced Activities
 EUETSP9
 N/A
 Outsourcing of data flow activities is limited to consultancy support from consultant's data collection and management process. The quality of any outsourced data flow activities is checked by the Senior Real Estate Manager, and the final report further reviewed by the Director Sustainability & Operational Risk. Outsourced activities that are carried out

take consideration of the inherent risks and control risks identified. Utilities providers are engaged if inconsistencies are found, in order to understand the causes, make appropriate corrections and put in place appropriate corrective action.

Post or department responsible for the procedure and for any data generated Director Sustainability & Operational Risk

Location where records are kept Digital Realty’s EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.

Name of IT system used N/A

List of EN or other standards applied N/A

hh. Record Keeping and Documentation

Details of the procedures used to manage record keeping and documentation:

Title of procedure EU ETS Procedure 10: Record Keeping and Documentation

Reference for procedure EUETSP10

Diagram reference N/A

Brief description of procedure. The description should cover the essential parameters and operations performed Records of all relevant data and information are kept in accordance with Annex IX of the MRR, for at least 10 years. These are held within Digital Realty’s EU ETS Evidence Pack stored on Digital Realty’s IT system and backed up in accordance with Digital Realty’s rigorous IT Security policies. The monitoring plan, annual emissions reports and all data associated with the procedures described in the permit application are stored electronically on the IT system, in such a way that data can be made readily available upon request of the competent authority or verifier.

Post or department responsible for the procedure and for any data generated Senior Real Estate Manager

Location where records are kept Digital Realty’s EU ETS Evidence Pack, in hard copy and as saved in a designated folder on the Digital Realty IT system.

Name of IT system used N/A

List of EN or other standards applied N/A

ii. Risk Assessment

The results of a risk assessment that demonstrates that the control activities and procedures are commensurate with the risks identified:

Attachment	Description
N/A	N/A

jj. Environmental Management System

Does your organisation have a documented Environmental Management System? Yes

Is the Environmental Management System certified by an accredited organisation? Yes

The standard to which the Environmental Management System is certified: ISO 14001

12. Changes in Operation

kk. Changes in Operation

Article 24(1) of Commission Decision 2011/278/EC requires that Member States must ensure that all relevant information about any planned or effective changes to the capacity activity level and operation of an installation is submitted by the operator to the competent authority by 31 December each year. Article 12(3) of the MRR further provides that Member States may require information to be included in the monitoring plan of an installation for the purposes of meeting these requirements.

Details of the procedure used to ensure regular reviews are carried out to identify any planned or effective changes to the capacity activity level and operation of the installation that have an impact on the installation's allocation:

The procedure specified below cover the following:

- planning and carrying out regular checks to determine whether any planned or effective changes to the capacity activity level and operation of an installation are relevant under Commission Decision 2011/278/EC; and
- Procedures to ensure such information is submitted to the competent authority by 31 December of each year.

<p>Title of procedure</p> <p>Reference for procedure</p> <p>Diagram reference</p> <p>Brief description of procedure. The description should cover the essential parameters and operations performed</p>	<p>EU ETS Procedure 11: Changes in Operation</p> <p>EUETSP11</p> <p>N/A</p> <p>The monitoring plan is reviewed on a regular basis or in the case of any planned or effective changes to activities at the installation. Given that the installation is a data centre, significant changes to operation are considered unlikely; nonetheless any changes will be taken into account should they arise. The Senior Real Estate Manager reviews the monitoring plan annually to ensure that it is complete and reflective of any changes to the nature and functioning of</p>
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the installation.

Post or department responsible for the procedure and for any data generated Senior Real Estate Manager
 Location where records are kept Digital Realty's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Realty IT system.
 Name of IT system used N/A

13. Abbreviations

II. Abbreviations Acronyms or definitions

Abbreviations acronyms or definitions that have been used in this monitoring plan:

Abbreviation	Definition
N/A	N/A

14. Additional Information

Any other information:

Attachment	Description
Emissions_calcs.xlsx	Emissions calculations
CONFIDENTIAL-Technical Data Sheet for backup generators.pdf	Technical data sheet for back up generators
CONFIDENTIAL-Boiler specs.pdf	Technical data sheet for boilers
Ultrasonic Liquid Level Transmitter CONFIDENTIAL.pdf	Ultrasonic meter specs
Elster RABO Datasheet EN - new gas meter spec 2020.pdf	2020 gas meter spec

15. Confidentiality

mm. Confidentiality Statement

It is the Environmental Protection Agency's policy to make information received by it in the course of its work open to inspection by any person on request. This is in accordance with the provisions of the European Communities (Access to Information on the Environment) Regulations 2007 to 2011.

In the event that you considered that some of the information being submitted of a confidential nature, then the nature of this information and the reasons why it should be considered confidential, with reference to the European Communities (Access to Information on the Environment) Regulations 2007 to 2011 and any amendments must be explicitly requested using the facility below. The Board of the Environmental Protection Agency will consider the requests and if the information can be deemed as confidential and necessary.

Notwithstanding any request for confidentiality, the Environmental Protection Agency explicitly reserves the right to release data to the Commission, including emissions and allocations to the public, on the basis that the data will be used for the purposes foreseen in Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.

Please tick this box if you consider that any part of your form should be treated as commercially confidential/sensitive: true

The table below identifies which (if any) sections of the form the operator considers should be treated as commercially confidential and explains why disclosure of this information would cause an adverse effect to commercial interests.

Section	Justification
Installation Activities - Site Diagram	European Communities (Access to Information on the Environment) Regulations 2007, Section 9(1)(c)
Additional Information - spec sheets	European Communities (Access to Information on the Environment) Regulations 2007, Section 9(1)(c)
Emissions Details - details of generators and boilers	European Communities (Access to Information on the Environment) Regulations 2007, Section 9(1)(c)
Installation Activities - Annex I activities	European Communities (Access to Information on the Environment) Regulations 2007, Section 9(1)(c)

END of Appendix I.