



Headquarters,  
Johnstown Castle Estate,  
County Wexford, Ireland

## GREENHOUSE GAS EMISSIONS PERMIT

**Permit Register Number:** IE-GHG190-10516-1

**Operator:** Digital Netherlands VIII B.V.  
Stratus House, Unit 1  
1st Floor, College Business &  
Technology Park  
Blanchardstown  
DUBLIN 15

**Installation Name:** DUB14 Profile Park

**Site Name:** DUB14 Profile Park

**Location:** Grange Castle, Nangor Road  
Dublin 22  
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<sup>o</sup> IE-GHG190-10516.

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](http://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-GHG190-10516-1	13 March 2020	07 April 2020	

### Previous Permits

Permit number	Change Type	Date application received	Date Permit issued	Comment
IE-GHG190-10516-1	GHG Permit Application	13 March 2020		

### 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)	Digital Netherlands VIII B.V.
“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.

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## 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:**

Digital Netherlands VIII B.V.  
Stratus House, Unit 1  
1st Floor, College Business & Technology Park  
Blanchardstown  
DUBLIN 15

Company Registration Number: 906549

to carry out the following

**Categories of activity:**

<b>Annex 1 Activity</b>
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):

DUB14 Profile Park **Installation number:**

located at

Grange Castle, Nangor Road  
Dublin 22  
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 is the first GHG permit granted to the installation.
- 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.:

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	Generator 1	< 50	MW
S2	Generator 2	< 50	MW
S3	Generator 3	< 50	MW
S4	Generator 4	< 50	MW
S5	Generator 5	< 50	MW
S6	Generator 6	< 50	MW
S7	Landlord PBB Generator 7	< 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.*

Sealed by the seal of the Agency on this the 07 April 2020:

PRESENT when the seal of the Agency was affixed hereto:

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Ms. Annette Prendergast  
Inspector/ Authorised Person

# Appendix 1 to Greenhouse Gas Emissions Permit Number IE-GHG190-10516

## 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](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](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](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](mailto: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.

<b>Installation name</b>	DUB14 Profile Park
<b>Site name</b>	DUB14 Profile Park
<b>Address</b>	Grange Castle, Nangor Road Dublin 22 Ireland

<b>Grid reference of site main entrance</b>	E 303909 N 230335
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<b>Licence held pursuant to the Environmental Protection Agency Act 1992, as amended.</b>	No
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Has the regulated activity commenced at the Installation? Yes

<b>Date of Regulated Activity commencement</b>	08 November 2018
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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** Digital Netherlands VIII B.V.

**Company Registration Number** 906549

#### 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
Address Line 2	1st Floor, 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	DUB14 Profile Park Grange Castle, Nagor Road, Dublin 22 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 facility to the west of Dublin. The main purpose of the site is to host data. The site is operated by Digital Netherlands VIII B.V. The activity carried out at the installation is the 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). This is due to the seven on-site gas oil generators which provide standby electricity generation capacity to power the datacentre in the event of a power failure. There are no other combustion units at the installation.

##### 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
DUB14 Profile Park Site Plan and Emission Points v2.pdf	DUB 14 Profile Park Site Plan and Source/Emission Points
Site location map 2 -PBB Gen-labelled.pdf	Site Map 2 S7 generator

#### i. Estimated Annual Emissions

Detail of the estimated annual emission of CO<sub>2</sub> 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 CO<sub>2</sub> excluding CO<sub>2</sub> from biomass.

Estimated Annual Emissions (tonnes CO<sub>2(e)</sub>) 65

Justification for the use of a conservative estimate of CO<sub>2</sub> emissions. DUB14 is estimated to emit <0.5% 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.

<b>Emission Source Reference</b>	<b>Emission Source Description</b>
S1	Generator 1
S2	Generator 2
S3	Generator 3
S4	Generator 4
S5	Generator 5
S6	Generator 6
S7	Landlord PBB Generator 7

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

<b>Emission Source Reference</b>	<b>Emission Source Description</b>
S1	Generator 1
S2	Generator 2
S3	Generator 3
S4	Generator 4
S5	Generator 5
S6	Generator 6
S7	Landlord PBB Generator 7

**l. Emission Points**

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

<b>Emission Point Reference</b>	<b>Emission Point Description</b>
EP1	Generator 1 exhaust
EP2	Generator 2 exhaust

Emission Point Reference	Emission Point Description
EP3	Generator 3 exhaust
EP4	Generator 4 exhaust
EP5	Generator 5 exhaust
EP6	Generator 6 exhaust
EP7	Landlord PBB Generator 7 Exhaust

#### 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	Combustion: Commercial standard fuels	Gas/Diesel Oil

#### 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	S1,S2,S3,S4,S5,S6,S7	EP1,EP2,EP3,EP4,EP5,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<sub>2(e)</sub> 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<sub>2(e)</sub> per year.

Note: the above data shall include transferred CO<sub>2</sub> but exclude CO<sub>2</sub> 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 <sub>2</sub> O	No
Monitoring of PFC	No
Monitoring of transferred / inherent CO <sub>2</sub>	No

**9. Calculation**

**r. Approach Description**

The calculation approach including formulae used to determine annual CO<sub>2</sub> emissions:

Source Stream F1 – Gas/Diesel Oil. The quantity of Gas/Diesel Oil consumed by the standby generators (activity data) is determined from the following method: Monthly run hours are recorded at the end of each month for each generator by the site engineer in the operations team. These are recorded on site on spreadsheets. These spreadsheets get sent to head office on a monthly basis and the external consultants on a quarterly basis. The external consultant then calculate the total run hours of each generator for the reporting year (end run hour read - start run hour read) and multiplies the run hours by the volume of fuel consumed per hour based on the manufacturer specification at 100% full load (prime power). This produces a total annual fuel consumption in litres. Then using the SEAI conversion factors for the annual gas oil fuel density figure: <https://www.seai.ie/resources/seai-statistics/conversion-factors/> converts the litres into tonnes. Litres/density = tonnes (activity data).

As a secondary source of data, the fuel levels from the two bulk tanks and their ultrasonic gauges will be recorded on a monthly basis on the spreadsheet along with any fuel deliveries, so opening and closing reads plus deliveries can be used a secondary method. The determined fuel usage (Activity Data) is recorded in the reporting spreadsheet for the relevant year. The gas/diesel oil consumption from consuming activities are summed together to provide activity data.

The CO<sub>2</sub> 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.

### 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	S1,S2,S3,S4,S5,S6	RH1	run hour meter/ engineer records	N/A	minutes	N/A	On the generator
F1	S1,S2,S3,S4,S5,S6	RH2	run hour meter/engineer records	N/A	minutes	N/A	On the generator
F1	S1,S2,S3,S4,S5,S6	RH3	run hour meter/engineer records	N/A	minutes	N/A	On the generator
F1	S1,S2,S3,S4,S5,S6	RH4	run hour meter/engineer records	N/A	minutes	N/A	On the generator
F1	S1,S2,S3,S4,S5,S6	RH5	run hour meters/engineer records	N/A	minutes	N/A	On the generator
F1	S1,S2,S3,S4,S5,S6	RH6	run hour meters/engineer records	N/A	minutes	N/A	On the generator
F1	S1,S2,S3,S4,S5,S6	EG1 and EG2	Electronic tank gauge	0-35,000	litres	1	On each of the two bulk fuel storage tanks
F1	S7	Landlord RH7	run hour meter/ engineer records	N/A	minutes	N/A	On the generator

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
F1	S1,S2,S3,S4,S5,S6,S7	MD1	Gas Oil Delivery Truck meter	various	litres	7.5	Third Party Delivery Meter

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	RH1	Continual	Operator	N/A	N/A	N/A
F1	RH2	Continual	Operator	N/A	N/A	N/A
F1	RH3	Continual	Operator	N/A	N/A	N/A
F1	RH4	Continual	Operator	N/A	N/A	N/A
F1	RH5	Continual	Operator	N/A	N/A	N/A
F1	RH6	Continual	Operator	N/A	N/A	N/A
F1	EG1 and EG2	Batch	Operator	N/A	N/A	N/A
F1	Landlord RH7	Continual	Operator	N/A	N/A	N/A
F1	MD1	Batch	Trade partner	Yes	Yes	Yes

**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 <sub>2(e)</sub>	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
F1	S1,S2,S3,S4,S5,S6,S7	EG1 and EG2, Landlord RH7, MD1,RH1,RH2, RH3,R	N/A	Standard	No tier	2a	2a	N/A	1	N/A	N/A	65	100	De-minimis	N/A	n/a	n/a

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 <sub>2(e)</sub>	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
		H4,RH5,RH6															

Total Estimated Emissions for Calculation (tonnes CO<sub>2(e)</sub>)

65

**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	S1,S2,S3,S4,S5,S6,S7	No tier	2a	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.

<b>Source Stream Ref.</b>	<b>Emission Source Refs.</b>	<b>Justification for the applied tier</b>	<b>Improvement Plan Reference (where applicable)</b>
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	S1,S2,S3,S4,S5,S6,S7	NCV	Ireland's National Greenhouse Gas Inventory	N/A
F1	S1,S2,S3,S4,S5,S6,S7	EF	Ireland's National Greenhouse Gas Inventory	N/A
F1	S1,S2,S3,S4,S5,S6,S7	OxF	MRR	1

### Sampling and Analysis

Do you undertake sampling and analysis of any of the parameters used in the calculation of your CO<sub>2</sub> 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; Primary contact with 3rd party agencies; Sign off of annual site emissions report; Periodic review (and update) for Policies and Procedures
Senior Data Centre Manager	Day-to-day site implementation and compliance with EUETS; Enforcement of Technical Policies and Procedures; Periodic progress review: Submission of regional data; Management of Policy and Procedure variations; Site level communication and stakeholder engagement
Site technical operations team/Site engineer	Collection and consolidation of site level data; Maintenance of monitoring infrastructure (with third party contractors)
EU ETS Consultants	Annual emission calculations; Query data; Notifications and procedure update

Attachment	Description
DUB14 Profile Park Organisation chart.docx	DUB14 Profile Park Organisation chart

**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 &amp; Operational Risk assigns responsibilities for monitoring and reporting to the Senior Data Centre Manager, who are responsible for day-to-day compliance and who delegates specific tasks to the site operations team according to the competencies required for each task. The site engineers in the operations team managed by the Senior Data Centre Manager, collect the site level data and provide that to external consultants for the emissions calculations. The site operations team and third party contractors carry out the maintenance of the monitoring infrastructure. Senior Data Centre Manager, with consultancy support, carries out internal review and validation of data, ensuring that corrections and corrective actions are identified and actioned as appropriate. They also undertake the enforcement of Technical Policies and Procedures. The Director Sustainability &amp; Operational Risk reviews the performance of the Senior Data Centre Manager on an annual basis, ensuring that they have 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. The Director Sustainability &amp; Operational Risk also reviews the performance of and any consultants who have delegated responsibilities. In turn, the Senior Data Centre Manager reviews the performance of the site technical operations team, 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 &amp; Operational Risk</p> <p>Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s IT system.</p>

Name of IT system used	N/A
List of EN or other standards applied	N/A

**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 Data Centre 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 generators), the Senior Data Centre Manager notifies the Director Sustainability & Operational Risk and the Digital Netherland VIII BV's consultants. At this stage, consideration is also given to potential measures for improvement of the monitoring methodology. Following the review by the Senior Data Centre 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. The assessment of the Monitoring Plan appropriateness includes a cross check between fuel stock readings (level gauges) and delivery invoices and the actual consumption rate of gas oil for combustion based on run hours and evaluation to determine the accuracy and appropriateness of methodology being applied.
	Note that under Article 47 of the MRR, Digital Netherlands VIII BV is exempt from using uncertainty thresholds and applied tiers.
Post or department responsible for the procedure and for any data generated	Senior Data Centre Manager
Location where records are kept	Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s 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	<p>Source Stream F1 (Gas/Diesel Oil):The quantity of Gas/Diesel Oil consumed by the standby generators (activity data) is determined from the following method:Monthly run hours are recorded at the end of each month for each generator by the site engineer in the technical operations team. These are recorded on site on spreadsheets. These spreadsheets get sent to head office on a monthly basis and the external consultants on a quarterly basis.</p> <p>The external consultant then calculate the total run hours of each generator for the reporting year (end run hour read - start run hour read) and multiples the run hours by the volume of fuel consumed per hour based on the manufacturer specification at 100% full load (prime power). This produces a total annual fuel consumption in litres. Then using the SEAI conversion factors for the annual gas oil fuel density figure: <a href="https://www.seai.ie/resources/seai-statistics/conversion-factors/">https://www.seai.ie/resources/seai-statistics/conversion-factors/</a> converts the litres into tonnes. Litres/density = tonnes (activity data). As a secondary source of data, the fuel levels from the two bulk tanks and their ultrasonic gauges will be recorded along on a monthly basis on the spreadsheet with any fuel deliveries, so opening and closing reads plus deliveries can be used a secondary method.The determined fuel usage (Activity Data) is recorded in the reporting spreadsheet for the relevant year. The gas/diesel oil consumption from consuming activities are summed together to provide activity data.</p> <p>The CO2 emissions are determined from the following calculation:</p> <p><math>CO_2 = \text{Activity Data} \times \text{Net Calorific Value (NCV)} \times \text{Emission Factor (EF)} \times \text{Oxidation Factor (OxF)}</math> where NCV, OxF and EF are taken from the latest EPA Ireland country-specific data release.</p> <p>The total consumption figure is multiplied by the NCV, EF and OxF values for diesel/gas oil. The resulting figure is reviewed by the Director Sustainability &amp; Operational Risk and associated consultants and is entered into the annual emissions report. The annual emissions report is reviewed by the Director Sustainability &amp; Operational Risk.</p>
Post or department responsible for the procedure and for any data generated	Director Sustainability & Operational Risk
Location where records are kept	Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s IT system.

Name of IT system used N/A  
 List of EN or other standards applied N/A  
 List of primary data sources Diesel generator run hour records, diesel/gas oil delivery invoices and electronic gauges readings  
 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 (tCO2e) = Activity Data x Net Calorific Value x Emission Factor 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
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 Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s 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	The Source Stream 1 (diesel/gas oil) calculated using recorded run hours and specified flow rates of each generator (as permitted under Article 47 of the MRR). The Senior Data Centre Manager, assisted by the consultants, checks the consumption data on an annual basis in order to ensure that consumption data is consistent. Where inconsistencies are found, e.g. run hours uncertainty, the Senior Data Centre Manager engages with facilities managers in order to understand the causes and puts in place appropriate corrective action. The back up methodology of checking stock levels on the bulk tanks and taking into account deliveries is used as a cross check of the methodology and the equipment will be checked and maintained at regular intervals to ensure quality assurance. The fuel delivery tankers are fitted with flow meters which are subject to national metrological controls. Calibration records are obtained for the gas oil delivery trucks and reviewed upon receipt. The level gauges on the gas oil storage tanks are checked and maintained at regular intervals.
Post or department responsible for the procedure and for any data generated	Senior Data Centre Manager
Location where records are kept	Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s 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 Netherlands VIII BV'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 Data Centre Manager
Location where records are kept	Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s 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 review and validation process includes a check on whether data is complete, comparisons with data over previous years, comparison of fuel consumption reported with purchase records and factor obtained for fuel suppliers with international reference factors , if applicable, and criteria for rejecting data. The Senior Data Centre Manager compiles consumption data with the assistance of site engineers, with support from consultants. The data is checked on a regular basis to ensure that: Data is complete and data is consistent with that reported in previous periods. Emissions calculation factors are reviewed on an annual basis to ensure that the factors used are consistent. The Senior Data Centre Manager and Director Sustainability & Operational Risk, 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	Senior Data Centre Manager
Location where records are kept	Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s IT system.
Name of IT system used	N/A
List of EN or other standards applied	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	EU ETS Procedure 8: Corrections and Corrective Actions
Reference for procedure	EUETSP8
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	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. In accordance with the GHG permit the Senior Data Centre Manager shall notify the Agency in writing within three (3) days of becoming aware of any factors which may prevent compliance with the conditions of this permit, such as any capacity expansion or change to the approved monitoring plan.
Post or department responsible for the procedure and for any data generated	Senior Data Centre Manager
Location where records are kept	Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s IT system.
Name of IT system used	N/A
List of EN or other standards applied	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	EU ETS Procedure 9: Control of Outsourced Activities
Reference for procedure	EUETSP9
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Outsourcing of data flow activities is limited to consultancy support from consultant's collection and management process. The quality of any outsourced data flow activities is checked by the Senior Data Centre 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.
Post or department responsible for the procedure and for any data generated	Director Sustainability & Operational Risk
Location where records are kept	Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital

Name of IT system used Netherland VIII B.V.s IT system.  
 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 the EU ETS Evidence Pack stored on Digital Netherlands VIII BV's IT system and backed up in accordance with Digital Netherlands VIII B.V.'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 Data Centre Manager  
 Location where records are kept Digital Netherlands VIII BV 's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the Digital Netherland VIII B.V.s 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 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.

Title of procedure	EU ETS Procedure 11: Changes in Operation
Reference for procedure	EUETSP11
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	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 Data Centre Manager review the monitoring plan annually to ensure that it is complete and reflective of any changes to the nature and functioning of the installation.
Post or department responsible for the procedure and for any data generated	Senior Data Centre Manager
Location where records are kept	Digital Netherlands VIII BV's EU ETS Evidence Pack, in hard copy and saved in a designated folder on the 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
Confidential - DUB14 -Profile Park Generator Thermal Input Calc 2019_v2.xlsx	Confidential - DUB14 -Profile Park Generator Thermal Input and Estimated Emissions Calc
7721-17-011 - DUB14 Profile Park Phase 3 R1 - 26.10.2017.pdf	Confidential - Generator 1-6 Technical Specifications
Gen A.pdf	Confidential - Gen 1 commissioning sheet
Gen C.pdf	Confidential - Gen 3 commissioning sheet
Gen D.pdf	Confidential - Gen 4 commissioning sheet
GEN F.pdf	Confidential - Gen 5 commissioning sheet
Gen G.pdf	Confidential - Gen 6 commissioning sheet
PBB Gen.pdf	Confidential - Landlord PBB Gen 7 commissioning sheet
Confidential Gen Fuel System.pdf	Confidential -Technical connection of first 5 generators
Confidential S7 generator specification.pdf	Confidential - Landlord PBB Generator 7 specification
Level Gauges.pdf	Specification for electronic level gauges

### 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	Installation Description, Site Plan and Emission Points, Estimated Annual Emissions and Annex I Activities.  Due to the sensitivity of the site use and tenants, the installation activities is deemed to be sensitive in nature.  Emission and sources diagram - European Communities (Access to Information on the Environment) Regulations 2007, Section 9(1)(c)
Emissions Details	Emissions Sources and Emission Points. Due to the sensitivity of the commercial use of the site and it's tenants, and the presence of competitors in the vicinity, the emission details are sensitive European Communities (Access to Information on the Environment) Regulations 2007, Section 9(1)(c)
Additional Information	Thermal calculation and estimated annual emissions document. Generator specifications, commissioning sheets and electronic gauges specifications. Due to the sensitivity of the commercial use of the site and it's tenants, and the presence of competitors in the vicinity, the thermal calculation and estimated annual emissions are sensitive. European Communities (Access to

<b>Section</b>	<b>Justification</b>
	Information on the Environment) Regulations 2007, Section 9(1)(c)

**END of Appendix I.**