

## Response template for Administration of Green Gas Levy Consultation

This template contains all the questions posed in the Administration of the Green Gas Levy consultation document. Through this template we're aiming to collect your feedback on our proposals on how we will administer the Green Gas Levy. We welcome your views and encourage you to respond to the questions that are of most interest. Please provide your contact details in the fields below. To respond, please provide your views in the space below the relevant question.

Organisation Name:	Regent Gas
Organisational Type:	Gas Supplier
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## Consultation questions

1. Do you have any comments on the first proposal on data collection methods? Do you have any further suggestions for how data collection could be improved?

When: At the start of each quarter

Who: obligated licensed gas suppliers

What: submit the total number of meter points (sum of Meter Point Reference Numbers (MPRNs)) they served for each day of the previous quarter on a dedicated register.

What for: calculate each supplier's levy obligation for that quarter  
calculate the following quarter's credit cover requirement

Regent Gas doesn't have any comment.

2. Do you have any comments on the alternative proposal that Ofgem could collect data from a third-party and require suppliers to validate this?

Alternative approach: obtain suppliers' meter point data from a third party and require suppliers to verify this and confirm whether the figure is accurate.

Regent Gas finds that a third party collecting the data is a good alternative, as there will be only one central point of collection and one interface with Ofgem. Letting the suppliers collect and share their data with Ofgem could lead to several issues as:

- Different format
- Delay in sending the data
- Connection issue when sending

An organisation like Xoserve would be perfect for that, as it already have all the data requested for the Green Gas levy. The suppliers would have only to validate the data.

3. Do you have any comments on the proposed list of information required to support a notification that a supplier is likely to be an exempt supplier? Is there any additional information that you believe will help support a notification?

licensed gas suppliers whose total gas supplied during a scheme year includes at least 95% certified green gas (certified biomethane) in the form of retired certificates issued under an approved certification scheme, will be exempt from paying the levy for that year.

Suppliers who believe that they are likely to be an exempt supplier for a forthcoming scheme year must notify us ahead of that scheme year and by a date specified in the scheme schedule. The notification must be supported by:

- any information we may request to support their notification and
- written confirmation from a responsible officer that the information provided is correct

Evidence The requirements for supporting information will be set out in guidance, and we

propose that this may include, but not be limited to:

- Copies of Gas Purchase Agreements (GPAs) for the relevant scheme year
- Any contractual agreements related to the purchase or trading of green gas certificates that are separate to the above
- Evidenced detail on the volume of gas supplied in the previous years, and the proportion of gas certified as green within that supply volume
- A letter of intent from the supplier signed by a responsible person, stating that the supplier intends to be a green gas supplier for the duration of that scheme year

Regent Gas doesn't have any comment.
4. From your experience of providing credit cover for other purposes previously, do you anticipate any difficulties in being able to obtain the issue of a letter of credit that would meet the criteria requested and in the timeframes required? If there are concerns or there have been previous issues please provide evidence of this within your response.
Regent Gas doesn't have any concerns
5. Do you agree or disagree with Ofgem's proposed approach to the discretionary return of excess credit cover in quarters 1-3 each year, including limiting requests to once per year, and the proposed de minimis threshold for returns? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
Regent Gas agrees with that.
6. From your experience of providing credit cover for other purposes do you have any feedback on any of the aspects proposed which could be made more efficient or easier to administer for either Ofgem or suppliers? Please provide evidence to support your response.
Regent Gas doesn't have any feedback
7. Do you agree or disagree with the proposed timings for making a mutualisation payment? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
<p>Where a supplier defaults on a levy payment, and <del>has</del> funds recovered through credit cover draw down are insufficient to cover their full levy payment due, we will be required to carry out a mutualisation process after the levy payment due date to make up the shortfall in levy payments.</p> <p>We expect to be able to issue any mutualisation notices needed within a period of 7 to 21 days after a levy payment was due. The timeframes will vary to allow an adequate period of time to draw down on available credit cover – the drawdown of which may vary in duration depending on the type of cover provided. Scheme suppliers will have no more than 10 working days to make a mutualisation payment from the date at which the invoice is issued by us.</p> <p>Regent Gas agrees with that.</p>

8. Do you agree or disagree with the proposal to include compliance with the Green Gas Levy in the Supplier Performance Report, and to use the same scoring methodology as used for other schemes? If not, please provide any other suggestions.

The register will be published in a format that meets government accessibility guidance. The data will be presented in both aggregated and supplier-level formats, and may include commentary. We propose keeping the information on our website for a period of 5 years.

The SPR records non-compliance such as suppliers failing to provide data by the date specified in legislation, providing incorrect data, or failing to make payments. Incidents of non-compliances are given a score based on the severity of impact, ranging from 1 (lowest impact) to 4 (highest impact).

Regent Gas agrees with that.

9. Are there any ways that we can help reduce the administrative burden for suppliers who are serving a low number of meter points, while ensuring that Ofgem and suppliers meet their obligations as will be set out within the regulations? Please provide evidence to support your response.

Regent Gas Regent Gas doesn't have any comment.