

Response template for consultation on the Administration of the Green Gas Support Scheme

This template contains all the questions posed within the Administration of the Green Gas Support Scheme (GGSS) consultation document. Through this template we're aiming to collect your feedback on our proposals on how we will administer the Green Gas Support Scheme. 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:	British Sugar plc
Organisational Type:	Food & Drink Manufacturer
Completed by:	Phillip McNaughton (Company Environment Manager)
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Consultation Questions

1. Is there any additional information that you think should be included in Provisional Tariff Guarantee Notices (PTGNs)?
No additional information.
2. Do you agree or disagree with our proposed approach to the administration of tariff guarantees? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We have no specific comments to put forward in this respect, although we would urge consideration of the clearest and simplest way(s) in order to reduce unnecessary bureaucracy. Based on experience, the most significant challenges are associated with this being a multi-stage process, overall being an onerous process and driven by milestones and deadline dates.

3. Do you agree or disagree with the proposed evidence requirements for demonstrating that a plant has commissioned? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We welcome that the commissioning requirements are broadly aligned with previous schemes (e.g. Non-Domestic Renewable Heat Incentive). While more details would be extremely useful, we welcome the general concept.
4. In relation to providing evidence of commissioning, are there other standards, practices, procedures or tests that should be considered? Please provide evidence to support your response.
No further comments.
5. Do you agree or disagree with the equipment we have suggested is included in our interpretation of 'equipment used to produce biomethane' and therefore must not have been previously used to produce biomethane? Please provide evidence to support your response.
No specific comments on this issue; a British Sugar application would be for a new Anaerobic Digestion (AD) plant.
6. In addition to any points made in relation to questions above relating to specific aspects of registration (questions 3-5), do you agree or disagree with our proposed approach to registration? Please provide alternative suggestions, including any evidence to support your response.
<p>We welcome the staged application process, with flexibility with respect to date of gas injection to the grid (i.e. stating the anticipated date of first entry), and also the 6-month slippage allowance included.</p> <p>We would like to propose that a pre-application consultation process would be useful prior to Stage 1 of the application process, as there is a significant amount of upfront work, time and cost commitment prior to submitting the application. We would anticipate that securing a signed gas entry agreement and planning permission would amount to a significant 6-figure expenditure. With respect to planning applications, we have observed inconsistency in approach across different local authorities, which can further increase the time and cost impact.</p> <p>We would also be interested to understand whether Ofgem would welcome the opportunity to discuss potential sector agreements under the GGSS, particularly in cases where significant quantities of biomass to input into AD plants are available.</p>

7. Do you agree or disagree with the proposed approach to making payments? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We have noted that this broadly aligned with the Non-Domestic RHI and FITs schemes, which seems sensible.
8. Do you have any comments on the proposed process for submitting injection data?
No comments.
9. Do you agree or disagree with the proposed fuel measurement and sampling (FMS) process? Do you have any suggestions on how it could be improved?
We would like to see amendments or simplification to the Green Gas Levy proposals, so as to allow sugar beet pulp to be used without restrictions as an AD feedstock, or to allow the biogas we can produce from AD to be used for an onsite boiler plant. We believe that this would maximise the potential of the GGSS and help to unlock further investment in rural areas and rural businesses.
10. We propose that the FMS questionnaire for the GGSS will be a similar format to the existing FMS questionnaire on the NDRHI scheme. Do you have any comments on the NDRHI FMS questionnaire and/or any suggestions on how it could be improved?
We welcome that the FMS questionnaire is consistent with previous schemes.
11. Do you have any comments on the overall arrangements for reporting on the waste and fossil fuel content of feedstocks?
No specific comments; we envisage that this would not be applicable to our proposed feedstock.
12. Do you agree or disagree with the proposed approach to the greenhouse gas criteria? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We are familiar with these requirements and the calculation methodology, and so again welcome the consistency in approach. For our proposed feedstock our GHG sustainability measurement is less than 20g CO ₂ equivalent per MJ of biomethane (vs the maximum threshold of 24g).

13. Do you agree or disagree with the proposed approach to the land criteria? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
Would need further information before we are able to comment fully on this aspect.
14. Do you agree or disagree with the proposals for preparing and submitting annual sustainability audit reports? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We agree with these proposals, which are consistent with what is currently required.
15. Do you agree or disagree with our proposal to require annual, independently assured audit information as further validation of GGSS/RTFO interaction by biomethane producers? Please give your reasons and any appropriate evidence to support your response.
We are supportive of this proposal, and welcome the flexibility point of view in this. However as mentioned in our answer to Q9, we would like to be able to use the biogas we can produce in our AD plant for an onsite Combined Heat and Power boiler under the GGSS, and to be able to claim GGSS tariff for it.
16. Do you agree or disagree with the proposal to require independently assured audit information on GGSS/RTFO interaction as an additional section to an Annual Sustainability Audit rather than as a separate stand-alone report instead? Please provide reasons and any appropriate evidence to support your answer.
We agree with this proposal.
17. Are you aware of any reason why an auditor could not assess the proposed additional requirements, and do you think both the current sustainability reporting requirement and the proposed RTFO interaction section could be provided by the same auditor? Please provide reasons for your answer/s.
We have no comment with respect to the approach in principle. It would be helpful for sites which are only injecting into the gas grid under the GGSS only to be exempt from any RTFO auditing aspects.
18. What documentation and/or evidence would you be able to provide to an independent auditor to demonstrate that dual claiming for the same biomethane is not taking place?
Not applicable (for our proposed scheme(s)).

19. Can you suggest any different approaches that could be taken to evidence GGSS/RTFO interaction by biomethane producers? Please provide reasons for your answer/s and supporting evidence.
No comments.
20. Do you have any additional comments on our proposed administration of GGSS/RTFO interaction?
No comments.
21. Do you have any feedback on our proposal that all registered producers will be subject to a site audit during the first year of operation? Please provide evidence and examples to support your response.
No comments.
22. Do you have any comments on the process for addressing overpayment?
No comments.
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We agree with the proposal.
24. Do you agree or disagree with the proposal that new producers should be able to meet outstanding obligations on behalf of the previous registered producer? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We have no comments, as this would not be applicable to British Sugar.
25. Do you have any additional comments on how we will administer the change of registration process?
No additional comments.
26. Do you have any comments on the process for withdrawing from the scheme?
No comments.

27. Do you have any suggestions for additional information that could be included in quarterly and annual reports, or on the format of the reports?
No suggestions.
28. Do you agree or disagree with the proposed approach to managing a shortfall in scheme funding? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
No additional comments, we agree with the approach.