

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:	
Organisational Type:	
Completed by:	
Contact details:	

Consultation Questions

1. Is there any additional information that you think should be included in Provisional Tariff Guarantee Notices (PTGNs)?
An estimated timeframe for the review of financial close evidence would be beneficial; it often surprises clients just how long Stage 2 takes. If the review takes too long it often impacts negatively on project timescales - most funders require an approved TG, so delays in Stage 2 review mean that initial funding cannot be secured, nor the project started.
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.

<p>We agree with the proposed approach and recognise that it will give potential participants a greater certainty over the available budget before committing time, money, and resource to preparing a full application. However, the administration needs improving, with the main issues being the length of time taken for Stage 2 review, and the repetition involved in review of the financial close evidence. We often get asked the same questions 2 or 3 times on a single piece of evidence. Also, not all projects will be funded in a 'conventional' way, so a greater degree of flexibility in documents acceptance and review would be appreciated.</p>
<p>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.</p>
<p>This is a little outside our remit but we agree that a clear itinerary of the commissioning minimums must be outlined in guidance.</p>
<p>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.</p>
<p>As above, this is not within our remit.</p>
<p>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.</p>
<p>We agree that there should be clear definitions of 'pre-used plant'.</p> <p>We would also welcome clarification to understand why, as it stands, sites that are not RHI accredited but have previously injected biomethane, are precluded from making a GGSS application.</p>
<p>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>
<p>Agree. The proposed registration process follows an approach that we have seen before under the NDRHI scheme, and it is a sensible route to follow.</p>
<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.</p>

Agree. The approach of making quarterly submissions and receiving quarterly payments is a logical approach. We do not have any issues with having set quarter dates, providing the scheme administrator has the capacity to process submissions in a timely manner.
8. Do you have any comments on the proposed process for submitting injection data?
Agree; this is a similar approach to the one followed under the NDRHI Biomethane scheme, and this has worked well in our experience. The proposed window in which submissions must be made (i.e. within 28 days of end of quarter), seems logical.
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?
Agree. We agree with the information must be demonstrated within the FMS.
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?
<p>There needs to be a system to allow new feedstocks to be added and approved quickly, such as a pre-approved feedstock list, like the Sustainable Fuel Register. We have often found the FMS approval process to be slow, so some automatical approval for conventional feedstocks would be very beneficial.</p> <p>We have also found the NDRHI FMS to be a little too locked-down; we have had difficulties creating FMS' for sites with large numbers of feedstocks due to the small table sizes, and it is difficult to paste data in these documents too.</p> <p>We would also welcome some level of interchangeability of the GGSS FMS with the RTFO scheme and vice versa. I.e., if a feedstock is approved on one scheme, it would be great if it could be automatically approved/recognised on the other.</p>
11. Do you have any comments on the overall arrangements for reporting on the waste and fossil fuel content of feedstocks?
No. We would expect lab tests to be undertaken on AD feedstocks.
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.

<p>Agree. We would like this to remain consistent with the approach followed under the NDRHI.</p> <p>We would like to see the apportioning tool pre-built with calculations to manage deductions in the event they are required; plus, any other associated calculations that Ofgem expect to see. Operators should not be expected to edit the apportioning tool, as this can lead to unnecessary delays.</p>
<p>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.</p>
<p>Agree, but further detail will need to be provided on how participants can demonstrate compliance with land criteria for solid biomass.</p>
<p>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.</p>
<p>Agree. We would like this to remain consistent with the approach followed under the NDRHI.</p>
<p>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.</p>
<p>Agree. We agree that independent audits are critical to help mitigate against any double counting or green washing of units that have already been claimed.</p>
<p>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.</p>
<p>Agree. It would be nice to have the audits combined, for ease and speed of getting the audit completed.</p>
<p>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.</p>

<p>We cannot see any reason why an auditor could not complete the additional requirements on the basis of the full provision of information as managed by the Operator. This is dependent on the Operator on fulfilling the requirement to obtain the information and provide access to the auditor.</p>
<p>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?</p>
<p>From a GGSS perspective, we would expect an operator to be able to provide meter reads and Gemini/Xoserve data to corroborate biomethane injection.</p> <p>We would also welcome some sort of physical metering approach to be considered- a pair of gas flow meters could be arranged in parallel within the grid entry unit. These could be situated between propanation and injection. One of the meters could be registered for GGSS and the other for RTFO. This gives the operator a physical decision to make – the biomethane that is flowed through the 'GGSS meter', would be used as part of a GGSS claim, and likewise for the 'RTFO meter' and RTFO claim. At the end of the reporting period, the meter reads could be used as evidence in a submission.</p>
<p>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.</p>
<p>None.</p>
<p>20. Do you have any additional comments on our proposed administration of GGSS/RTFO interaction?</p>
<p>No. We would welcome a smooth interaction between the two schemes, to make it as easy as possible for generators to claim biomethane under RTFO or GGSS.</p>
<p>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.</p>
<p>Agree; we feel this is a good approach to ensuring sites are compliant and any outstanding issues are quickly smoothed over within the first year. This is providing that the audit results are communicated to the Operator in a timely manner and providing the audit will not unfairly delay the first GGSS payment(s).</p>
<p>22. Do you have any comments on the process for addressing overpayment?</p>
<p>Overpayments should be addressed within one year from the monies being paid. The operator should have the opportunity to negotiate a payment plan with the scheme administrators.</p>

<p>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.</p>
<p>Agree. The proposed approach appears fair but reviewers need to be more timely, as in our experience, they often take significant time to provide an answer. This is time a perspective applicant may not have to spare if securing funding/in build phase.</p>
<p>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.</p>
<p>Agree, this is a fair approach.</p>
<p>25. Do you have any additional comments on how we will administer the change of registration process?</p>
<p>In our experience the change of ownership process is often very long and drawn out, for what should be a simple process. The online form on the account used for NDRHI is not fit for purpose (character restrictions, and only allows one application per account), so we hope this can be improved, or removed. There is too much emphasis on waiting on instruction from the original owner's email address, which often is no longer accessible (administration). The change of ownership process should allow for communication from consultants working for old or new owners, as often they have greater knowledge of what is required at each stage than the owner and can facilitate the change more effectively.</p>
<p>26. Do you have any comments on the process for withdrawing from the scheme?</p>
<p>We would appreciate a middle ground whereby an owner may wish to sell their installation, however they have not secured a new buyer, so cannot engage in change of ownership. It's obviously imperative that the registration remains live during this period, so long as the correct notification is made within 28 days of a change.</p>
<p>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?</p>
<p>None</p>
<p>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.</p>

Will the queuing system proposed for when there is no longer sufficient budget for certain project be managed differently to that for the TG mechanism on the NDRHI? The ability for allocated budget to leapfrog larger installations which may be earlier in the queue and be awarded to smaller installations later in the queue is unfair. This existing practice on the NDRHI means it becomes very difficult to secure budget for large installations, which are often more commercially focussed and more likely to benefit the public.