

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:	Gorsvenor Farms LTD
Organisational Type:	Argi Business
Completed by:	Charlie Steer
Contact details:	charles.steer@grosvenor.com

Consultation Questions

1. Is there any additional information that you think should be included in Provisional Tariff Guarantee Notices (PTGNs)?
No
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.
Yes
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.
No
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

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.
Agree
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.
No comment
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.
Agree
8. Do you have any comments on the proposed process for submitting injection data?
No Comment
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, No
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?
No comments
11. Do you have any comments on the overall arrangements for reporting on the waste and fossil fuel content of feedstocks?
No comments
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.
Not seen
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.
Not seen
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.
Not seen
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.

No comment
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.
No comment
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.
No
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?
No comment
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 comment
20. Do you have any additional comments on our proposed administration of GGSS/RTFO interaction?
No comment
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 feedback
22. Do you have any comments on the process for addressing overpayment?
No comment
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.
No comment
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.
No comment
25. Do you have any additional comments on how we will administer the change of registration process?
No comment
26. Do you have any comments on the process for withdrawing from the scheme?
No comment
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 comment
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 comment
<p>Comments on Eligibility</p> <p>Limitation on kWh production measured through a single injection point may reduce the opportunity to significantly decarbonise the agricultural sector, especially bovines.</p> <p>The concept of several farm based AD's producing biomethane, linked to a central upgrading and injection point makes small on- farm AD a viable proposition. The decarbonisation of the livestock sector then become a valuable part of reduction in UK emissions. Removing methane from the atmosphere provides a quicker fix to reversing climate change than reducing carbon dioxide (https://www.bbc.co.uk/news/science-environment-58174111)</p> <p>On Farm AD provides a host of solution to not on carbon emissions but also allows solution to reduce ammonia emissions as per the clean air consultation 2018, reduce artificial fertiliser usage and it the carbon emissions associated with application, reduce diffuse pollution, and increase soil health and crop yields.</p> <p>The advantages of centralised upgrading facilities are:</p> <ol style="list-style-type: none"> 1. Reduction in capex of AD, making plant construction a financially rewarding proposition for farmers, or groups of farmers. 2. Ability to dry and compress biogas to upgrading facility via low pressure pipework reduces energy in compression and transport via road tanker and associated carbon emissions. 3. Allows a large upgrading facility that can install carbon dioxide capture for transport to BECCS facilities such as HyNet in the north west. If in the vicinity of carbon networks such as West Cheshire carbon dioxide could be piped directly to long term storage. 4. The upgrading facility can be supported by renewable energy eg solar farm/ battery/wind and situated where there is grid capacity to run compression and upgrading equipment, sometimes not possible on more remote farms. The upgrading hub can supply green power back to the AD's for heat pumps for digester heating via direct wire in the same trench as the dry biogas pipeline, allowing for very energy efficient AD plants. 5. One injection point is simple to maintain, quality inspect and meter. <p>We would propose that production is metered on an individual AD plant basis an not as a total for the central upgrading facility.</p>