

## 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.

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Organisational Type:	Gas Shipper
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## Consultation Questions

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.

We have no issues with the proposed approach that, very sensibly, builds on experience with the RHI. However, we would urge all to be conscious that the world does not stay still. Innovative approaches can be anticipated as the market responds to the available incentives and while these may meet all the requirements set in Regulations, they may not fit easily within the proposed approach. As such, the approach must remain flexible and be adapted as necessary to encourage rather than stifle innovation.

As an example, innovative approaches are being developed such as the possibility of shared facilities that support biomethane being compressed and so able to be injected to the NTS, creating reverse flow from a distribution network to the NTS. This approach can help to make smaller AD plants economic since some costs can be shared with

others and can also ensure network capacity is available to allow injection, overcoming the local network constraints that can prevent some AD plants being developed. Approaches such as this that meet the requirements of the Regulations should be encouraged even if they do not sit easily with the details proposed in the consultation on the Administration of the Green Gas Support Scheme.