

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:	CNG Services Ltd
Organisational Type:	SME
Completed by:	John Baldwin
Contact details:	John.baldwin@cngservices.co.uk 07831 241217

Consultation Questions

1. Is there any additional information that you think should be included in Provisional Tariff Guarantee Notices (PTGNs)?
Please see REA response which we support
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.
Please see REA response which we support

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.
Please see REA response which we support
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.
Please see REA response which we support
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.
Please see REA response which we support
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.
Please see REA response which we support
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.
Please see REA response which we support
8. Do you have any comments on the proposed process for submitting injection data?
Please see REA response which we support
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?
Please see REA response which we support

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?
Please see REA response which we support
11. Do you have any comments on the overall arrangements for reporting on the waste and fossil fuel content of feedstocks?
Please see REA response which we support
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.
Please see REA response which we support
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.
Please see REA response which we support
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.
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.
Please see REA response which we support
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.
Please see REA response which we support

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.
Please see REA response which we support
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?
Please see REA response which we support
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.
Please see REA response which we support
20. Do you have any additional comments on our proposed administration of GGSS/RTFO interaction?
Please see REA response which we support
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.
Please see REA response which we support
22. Do you have any comments on the process for addressing overpayment?
Please see REA response which we support
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.
Please see REA response which we support
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.
Please see REA response which we support

25. Do you have any additional comments on how we will administer the change of registration process?
Please see REA response which we support
26. Do you have any comments on the process for withdrawing from the scheme?
Please see REA response which we support
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?
Please see REA response which we support
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.
Please see REA response which we support

Additional Comment

We are working on a project in Cheshire that will involve a network of dry biogas pipelines from AD plants that use cattle slurry as the primary feedstock. There are a number of significant advantages to the proposed approach, the key one is to reduce the capex/opex of the AD plants which have been uneconomic at <500 scm/h of biogas. The approach also allows a single plant to capture all the biogas CO₂. Our proposal would allow the remote AD sites to be registered for GGSS and receive payments directly at the lower tier (they will typically be 10 – 20 million kWh/annum).

We believe that the existing regulations may already permit this and set out this in the attached PDF. However, one change we are suggesting is that any methane slip at a downstream upgrading plant should be apportioned to the AD plant kWh. This is something that does not apply today.

It may be other approaches are possible to achieve the same result of supporting such AD plants but the approach we set out may be the simplest and easiest for Ofgem to audit and ensure compliance with the fundamental principles of the GGSS.