

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:	Renewable Energy Assurance Limited (administrators of the Green Gas Certification Scheme)
Organisational Type:	Non-for-profit company
Completed by:	Jesse Scharf
Contact details:	jscharf@greengas.org.uk

Consultation Questions

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

<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>No Comment</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>No Comment</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>No Comment</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>No Comment</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>
<p>No Comment</p>
<p>8. Do you have any comments on the proposed process for submitting injection data?</p>
<p>We support using extracts of Xoserve data and that this can be "self reported" each quarter however it must be recognised that this is secondary data that has been copy and pasted or screenshotted.</p> <p>Ofgem should investigate securing its own access to Xoserve data so that it can directly check the data submitted and/or move to a system where the Xoserve data is integrated into the GGSS accounts accessed by producers.</p>

In the Netherlands and Denmark registries issuing GoO have access to this kind of data from the grid system operator, which increases efficiency and reduces the opportunity for mistakes or fraud.
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?
No Comment
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 Comment
11. Do you have any comments on the overall arrangements for reporting on the waste and fossil fuel content of feedstocks?
No Comment
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.
No Comment
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.
No Comment
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>We support using extracts of Xoserve data and that this is "self reported" each quarter.</p> <p>However it must be recognised that this is secondary data that has been copy and pasted or screenshotted.</p>

<p>The Annual Sustainability Report must explicitly require the auditor to check the primary Xoserve data and that it matches the data submitted to Ofgem during the year. This should be included in the “checklists” referred to in 6.28 of the consultation.</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>We support the proposal to require annual validation of GGSS /RTFO interaction. The GGCS is not a biomethane producer and will not be claiming GGSS or seeking to be awarded RTFCs, but we have a strong interest in the biomethane sector setting robust assurance standards which underpin consumer trust and their willingness to buy GoO.</p> <p>Annual independent verification is a clear route to assuring biomethane traders and consumers of which units of production have and have not received GGSS payments and that no double claims have been made.</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>We support including this as a section of an Annual Sustainability Audit. It makes sense for auditors to assess requirements on GGSS/RTFO interaction at the same time as conducting the Annual Sustainability Audit so that there is only one submission and review process.</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>Both current and proposed sections could be provided by the same auditor.</p> <p>There are challenges for the auditor and these are set out in our response to questions 18, 19 and 20. However these are related to the availability of documentation and not the qualifications of 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>

We are not a producer but work with our producer members to ensure that the information in our registry is accurate and robust. As such we have extensive experience of the types of documentation and evidence producers have available. We also have an interest in our members being given a clear process with robust outcomes that is efficient to administer for Ofgem and producers and fits with the compliance process that we require.

We see five possible situations that the auditor may be faced with. They are set out in the table below and the documentation available in each situation is described in full beneath the table.

	Description	GGSS claim (support)	Certified within Voluntary Scheme	PoS issued for supported kWh	PoS issued for unsupported kWh
1	A producer who claims GGSS for 100% of their eligible biomethane and is not certified under a Voluntary Scheme recognised by the European Commission.	100%	No	No	No
2	A producer who claims GGSS for 100% of their eligible biomethane, is certified under a Voluntary Scheme e.g. ISCC, but has not issued any PoS.	100%	Yes	No	No
3	A producer who claims GGSS for 100% of their eligible biomethane, is certified under a Voluntary Scheme e.g. ISCC, and has issued PoS for GGSS supported biomethane.	100%	Yes	Yes- 100% or >100%	No
4	A producer who claims GGSS for less than 100% of their eligible biomethane, is certified under a Voluntary Scheme e.g. ISCC, and has issued PoS for the unsupported biomethane.	>100%	Yes	No	Yes 100% or >100%
5	A producer who claims GGSS for less than 100% of their eligible biomethane, is certified under a Voluntary Scheme e.g. ISCC, and has issued PoS for their unsupported and supported biomethane.	>100%	Yes	Yes - 100% or >100%	Yes - 100% or >100%

1) A producer who claims GGSS for 100% of their eligible biomethane and is not certified under a Voluntary Scheme recognised by the European Commission.

GGSS and injection evidence

The auditor should check the correct data has been submitted to Ofgem for the producers GGSS claims (see below for note on improving checks on total biomethane injected) and that GGSS has been claimed for 100% of production. The auditor should then check for any documentation that would facilitate the producer or any other party from claiming RTFCs for that biomethane.

Evidence from Voluntary Schemes

As an RTFC claim generally relies on the provision of Proof of Sustainability (PoS) documents by the producer to the operator of a duty point, the first check should be if the producer is a member of any Voluntary Scheme recognised by the European Commission. These are the schemes under which PoS can be generated by the producer.

There are three of these Schemes which handle biomethane, which all have public lists of certified producers:

- ISCC – <https://www.iscc-system.org/certificates/all-certificates/>
- REDCert – <https://redcert.eu/ZertifikateDatenAnzeige.aspx>
- NTA8080 <https://www.betterbiomass.com/en/certificate-holders/>

Supplementary evidence

If the producer is not certified under any of these Schemes for the annual period being audited it is very unlikely that any of their biomethane production will have been part of a RTFC claim.

However other sources of information could also be reviewed to rule out any possibility that RTFC claims have been made using documentation not from a Voluntary Scheme. The auditor can consult the annual renewable fuel RTFO statistics published by DfT which reports all types of biofuel awarded RTFCs where the feedstock was "Not Certified", along with what the feedstock used was and the producer's location. In the example below the statistics show that "Not Certified" biomethane from Food Waste produced in the UK was awarded RTFCs between 01/01/2020 and 22/12/2020.

344	None - Feedstock Not Certified	Biodiesel ME	Brown grease	Canada	0	0%
345				Netherlands	0	0%
346				United States	9	1%
347			Food waste	Ireland, Republic of	0	0%
348				United Kingdom	0	0%
349			Sewage system FOG	United Kingdom	0	0%
350			Soapstock acid oil contaminated with sulphur	United Kingdom	0	0%
351			Tallow - category 1	Ireland, Republic of	1	0%
352			Used cooking oil	France	0	0%
353				Netherlands	1	0%
354				United Kingdom	0	0%
355				United States	0	0%
356		Biomethane	Food waste	United Kingdom	2	0%
357		Hydrogen	Wind power	United Kingdom	0	0%
358		Off road biodiesel	Used cooking oil	United Kingdom	0	0%

<https://www.gov.uk/government/statistics/renewable-fuel-statistics-2020-third-provisional-report> - Tab RF0106

The auditor should check if the details of the biomethane in the RTFO statistics match the producers details i.e. a UK plant that uses food waste.

- If so the the producer should offer an assurance to the auditor that they did not produce the volumes being recorded in the RTFO statistics.
- If not then the auditor can be assured that the plant has not been involved in that RTFC claim.

Note that the timing of the publication of these annual RTFO statistics may not suit the GGSS auditing cycle, but the auditor could assess the information available at the time and in the next audit check the complete data set.

Evidence from the GGCS

The auditor should check the producer's activity within the GGCS to confirm that all GoO have been marked as "*Production Support – Yes*". These GoO issued will have been based on the same information as that on the GGSS register that the auditor will have checked. As such GoO do not represent additional assurance of if GGSS has been claimed or not or not, but they do show how those units of biomethane are being traded after the point of injection.

If the producer has recorded in their GoO that Production Support was not paid, whereas the GGSS register reports it was, then it could be an indication that the producer is seeking to facilitate a chain of custody where RTFCs are claimed at later date. While GoO have no formal status within the RTFO mechanism a producer or their counterparty may not realise that and RTFC claims could be attempted under a misunderstanding that GoO will support their claim.

In addition, while we recognise that this consultation is focused on dual claiming between GGSS and RTFCs, there are also other types of "dual claims" possible if GGSS supported biomethane is awarded a GoO is labelled as Production Support – No, for example "additionality" claims around who has incentivised the production of the gas.

Note that the biomethane producer will not have any records of the GoO beyond their issuing and transfer to the first counterparty. The auditor will not be able to assess the chain of custody beyond that point.

2) A producer who claims GGSS for 100% of their eligible biomethane, is certified under a Voluntary Scheme e.g. ISCC, but has not issued any PoS.

GGSS and injection evidence

As above the auditor should check the correct data has been submitted to Ofgem for their GGSS claims as they do for the current audit process (see below for note on improving checks on total biomethane injected) and that GGSS has been claimed for 100% of production.

Evidence from Voluntary Schemes

The auditor should then check for any documentation that would facilitate the producer or any other party from claiming RTFCs for that gas. In this situation the producer is certified within a Voluntary Scheme but no PoS have been issued. Therefore the evidence sought should be a lack of issuing of PoS and while it is challenging to prove a negative the auditor can look at several areas;

- Direct assurances from the producer that they have not issued any PoS.

- Membership of any electronic registry that facilitates PoS issuing and transfer should be checked to ascertain the absence of PoS issued during the audited period e.g. <https://trace-your-claim.com/>.
- Most PoS are generated manually using a PDF or Excel template and then emailed to counterparties. The auditor could check the operators email outbox for evidence of PoS sent (however this process could be time consuming and poses possible data protection issues).
- As part of a producer's ongoing Voluntary Scheme certification they will have an annual audit from a certification body such as DEKRA. The producer should provide to the GGSS auditor documentation from that audit which refers to the lack of issuing of any PoS.

Evidence from the GGCS

As in Situation 1 above, the auditor should also check the producer's GGCS activity to ensure that everything reflects the fact that GGSS has been claimed for 100% of the plant's production i.e. all GoO are labelled as *Production Support – Yes*

Supplementary evidence

As in Situation 1 above, they should check the RTFO statistics to assess the risk that the producer has supplied "Not Certified" fuel into a chain of custody that results in an RTFC claim.

3) A producer who claims GGSS for 100% of their eligible biomethane, is certified under a Voluntary Scheme e.g. ISCC, and has issued PoS for GGSS supported biomethane.

GGSS and injection evidence

Documentation on total biomethane injected and GGSS paid should be assessed, as detailed in the previous potential situations.

Evidence from Voluntary Schemes

Auditors must be aware that PoS can and are issued for biomethane that receives GGSS payments ***and doing so is not evidence that a dual claim has taken place.***

These PoS are issued on the request of consumers who are purchasing biomethane using GoO as a contractual instrument, in the knowledge that production support (NDHRI or GGSS) has been provided. They make that request because they want additional information on the sustainability of the biomethane, such as an actual greenhouse gas intensity number (which is not provided by a GoO).

Note:

- PoS do not indicate if Production Support has been received or not.
- The GoO does have Production Support information but it is not guaranteed that they are issued alongside the PoS
- The consumer requesting these PoS may be using biomethane as a transport fuel but they may do this without any RTFC claim being made (or a claim in any other equivalent "obligation scheme" outside the UK).

As stated above, the issuing of PoS for GGSS supported biomethane does not mean a dual claim has taken place, but it does flag that an RTFC claim could be facilitated and the auditor should seek further evidence.

That evidence can only be of the interaction of the producer with the initial counterparty and cannot eliminate the risk that the counterparty or someone further down the chain of custody makes a RTFC claim. To completely rule out a dual claim information from the RTFO Operating System (ROS) is needed (see question 19).

Without the information from ROS possible steps are;

- an assessment if the counterparties' names on the PoS have any relationship with the transport sector and score the risk accordingly. For example they can check if the counterparty is named on the RTFO supplier list
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/977825/RTFO-account-holders-April-2021.csv/preview.
- producer to provide written confirmation from their PoS counterparties that the PoS are not going to be used in any chain of custody involving an RTFC claim.
- Assessment of any contractual obligations between the producer and their counterparties around PoS transfers and links to supported and unsupported biomethane and RTFC claims.

Evidence from the GGCS

The auditor can request information from the producer related to their GGCS activity, matching the PoS to a set of GoO which will be marked as "*Production Support – Yes*".

The counterparty named on the PoS should match the counterparty recorded in the GGCS registry and the auditor can then be assured that these kWh have not been sold as "unsupported".

It is highly likely these GoO will have been issued but it is not guaranteed.

GGSS claims, GoO issuing and PoS should all align which give assurance that producer is accurately managing the sales of their biomethane via GoOs and PoS and transferring ownership of that biomethane with the correct information on claims under the GGSS.

Supplementary evidence

As in Situation 1 above, they should check the RTFO statistics to assess the risk that the producer has supplied "Not Certified" fuel into a chain of custody that results in an RTFC claim.

4) A producer who claims GGSS for less than 100% of their eligible biomethane, is certified under a Voluntary Scheme e.g. ISCC, and has issued PoS for the unsupported biomethane

GGSS and injection evidence

Documentation on total biomethane injected and GGSS paid should be assessed, as detailed in the previous potential situations.

Evidence from Voluntary Schemes

The auditor should view all PoS issued by the producer and match them to the kWh where GGSS has not been claimed i.e. unsupported biomethane, checking that the quantities recorded are the same. Note that they will not be able to view any PoS beyond those issued by the producer to the first counterparty and they will not have access to the ROS or any data on RTFCs claimed.

They may wish to follow the suggested evidence trail in situation 2 to check that no PoS have been issued for GGSS supported production e.g. evidence from Voluntary Scheme audits on which PoS have been issued.

Evidence from the GGCS

The auditor should then match the PoS issued to GoO within the GGCS registry labelled as “*Production Support – No*”.

The auditor should check that the counterparties named on the PoS match the counterparties named in the GGCS registry.

GGSS claims, GoO issuing and PoS should all align which give assurance that producer is accurately managing the sales of their biomethane via GoOs and PoS and transferring ownership of that biomethane with the correct information on claims under the GGSS.

Supplementary evidence

As in Situation 1 above, they should check the RTFO statistics to assess the risk that the producer has supplied “Not Certified” fuel into a chain of custody that results in an RTFC claim.

5) A producer who claims GGSS for less than 100% of their eligible biomethane, is certified under a Voluntary Scheme e.g. ISCC, and has issued PoS for their unsupported and supported biomethane

GGSS and injection evidence

Documentation on total biomethane injected and GGSS paid should be assessed as detailed in the previous potential situations.

Evidence from Voluntary Schemes

The auditor should view all PoS issued by the producer and match them to the kWh where GGSS has been claimed and not claimed, checking that the quantities are the same. Note that they will not be able to view any PoS beyond the PoS issued by the producer to the first counterparty and they will not have access to the ROS register or any data on RTFCs claimed.

Evidence from the GGCS

The auditor should view the producer’s GGCS activity.

They should match the GoO labelled “*Production Support – Yes*” to the kWh where GGSS has been claimed and PoS issued for those kWh. The auditor should check that the counterparties named on the PoS match the counterparties named in the GGCS registry. They should assess if the counterparties for these PoS and GoO are linked to the renewable transport fuel market and ask the producer to provide assurances from their counterparties that the PoS are not being used to claim RTFCs.

They should then match GoO labelled as “*Production Support – No*” to the kWh where GGSS has not been claimed and to the PoS that have been issued for those kWh. The auditor should check that the counterparties named on the PoS match the counterparties named in the GGCS registry.

GGSS claims, GoO issuing and PoS should all align which give assurance that producer is accurately managing the sales of their biomethane via GoOs and PoS and transferring ownership of that biomethane with the correct information on claims under the GGSS.

Supplementary evidence

As in Situation 1 above, they should check the RTFO statistics to assess the risk that the producer has supplied “Not Certified” fuel into a chain of custody that results in an RTFC claim.

Example of data available from GGCS producer account showing kWh marked as Production Support Yes and No

RGGOs available to Transfer

Transfer RGGOs to any GGCS Trader account

The table below shows all the RGGOs that you have been issued or are pending administrator approval.

Where there are RGGOs available to be transferred there will be a green “Transfer RGGOs” button showing.

Where all RGGOs from a consignment have been transferred that consignment will no longer show on the table. The Transfer History page will show you a record of all previously transferred RGGOs.

Where a pending button is shown the scheme administrator will need to approve the issuing of the RGGOs before they are available to be transferred.

If 1185 days have passed from the 1st of the month shown in the Gas injected during quarter ending in column then the table will indicate that these RGGOs have expired and you will not be able to transfer them.

RGGOs available to Transfer:

[Download CSV](#)

Gas injected during quarter ending in	Injection Date From and To	Biomass Information	Production Support	Sustainability Criteria	RGGO Expiry Date	RGGOs issued (kWh)	RGGOs available for transfer (kWh)	
November 2020	1 Aug 2020 to 30 Nov 2020	GGCS - Biomass (Unspecified) Classification (Residues)	Yes	Non-Domestic Renewable Heat Incentive (RHI) - UK	30 Jan 2024	1000000	99001	Transfer RGGOs
June 2020	1 April 2020 to 30 June 2020	GGCS - Biomass (Unspecified) Classification (Residues)	No	Non-Domestic Renewable Heat Incentive (RHI) - UK	30 Aug 2023	100000	99000	Transfer RGGOs

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.

Suggestion 1

Improving assurance on total biomethane injected values.

Any assessment of kWh where GGSS is claimed vs not claimed must be based on a robust assessment of the total biomethane injected (as defined in the GGSS as all gas entering the network being both biomethane and propane) and that correct deductions have been made for propane.

The GEMINI system operated by Xoserve provides robust and verifiable documentation on the injected total, however the existing auditing requirements do not make best use of this as there is no explicit requirement to check the primary data. Therefore it is possible that audits check secondary data e.g. meter readings copy and pasted from portals provided by gas shippers, which creates the potential for fraud and errors. If they do check the primary data this is often not made explicit in the audit.

The requirements on RTFO assurance should require the auditor to check primary data which is generally accessible to the producer and auditor via an online portal provided by their shipper. These values can then be matched to the quarterly GGSS claims and the Eligible Heat Output values in the GGSS register.

Suggestion 2

The documentation detailed in Ofgem's proposal and described in our answer to question 18 should offer a suitable level of assurance against dual claims, being equivalent to that offered against the GGSS sustainability criteria.

However in the absence of evidence from the DfT ROS register it is not possible to completely rule out that GGSS supported biomethane has not been part of a RTFC claim.

The type of cooperation suggested in 7.12 of the consultation document would allow a different approach that is more efficient for producers and provides a higher level of assurance to Ofgem. Should such an agreement be put in place then producers could offer a simple declaration that they were not involved in RTFC claims, which could be validated by Ofgem and/or the auditor against information from the ROS system.

For producers who claimed GGSS for less than 100% of their production, the information from ROS could be compared to total gas production and GGSS claims to show if any dual claims had been made. There would still be some effort by the auditor to check these values but the GGSS values and the RTFC values would be independent and verifiable by the auditor and Ofgem.

For these reasons we strongly support Ofgem developing a data sharing agreement with DfT as soon as possible.

20. Do you have any additional comments on our proposed administration of GGSS/RTFO interaction?

Overall the approach suggested in 7.9 does not reflect our understanding of the operation of the wholesale gas market, Voluntary Schemes or the GGCS and the terminology within those markets and schemes.

You state that "To do this we propose that the auditor must supply and verify the accuracy, reliability and robustness of supporting evidence submitted as proof of a 'contractual supply chain' for injected biomethane purchased from a producer by a shipper, trader or supplier."

We are concerned that this is a very open statement which does not specify if it relates to contracts for physical gas or contracts for documentation representing the renewable and sustainability value of the gas i.e. PoS and GoO.

Looking only at the physical gas contracts, the statement does not reflect the fact that a biomethane producer (unless they hold a gas shipping license) will never have their biomethane purchased from them by a trader or supplier. Only the gas shipper would hold a contractual relationship with the producer related to the entry of the gas into the market.

As drafted it could suggest that the auditor checks all contracts between shippers, traders and suppliers, however the producer will not have that information and the auditor has no ability to source that information from shippers, traders or suppliers. Where gas is traded on an exchange it may not be available to either counterparty.

Later in 7.9 examples of possible documentation are given (in italics below) however the language and terminology needs to be clarified.

- *Contracts between the producer and any suppliers/traders/shippers*

Details of the products the contracts relate to should be included e.g. contracts between the producer and their gas shipper related to the entry of gas into the distribution or transmission network.

- *Additional agreements between the producer and any suppliers/traders/shippers*

Types of additional agreements should be defined e.g. agreements between producers and traders with the Shipper as an intermediary partner.

- *Supporting documentation supplied to any suppliers/traders/shippers by the producer with the sale*

Types of supporting documentation should be defined e.g. documentation from Voluntary Schemes recognised by the European Commission i.e. Proofs of Sustainability.

- *Certification from a voluntary green-gas accreditation scheme which demonstrates the proportions claimed against each scheme*

Ofgem must not use the term “voluntary green-gas accreditation scheme” which will lead to confusion.

It is unclear if this refers to either Voluntary Schemes recognised by the European Commission¹ which are ISCC, REDCert and NTA8080 or registries that issue Guarantees of Origin (GoO) of which there are two in the UK, the GGCS and the Biomethane Certification Scheme. A definitive list would be easy to produce.

Instead we suggest you adopt the phrases;

¹ https://ec.europa.eu/energy/topics/renewable-energy/biofuels/voluntary-schemes_en

- "documentation from Voluntary Schemes recognised by the European Commission i.e. Proofs of Sustainability"
- "documentation from industry-led green gas registries i.e. GoO and equivalent certificates".

Note that POS issued under ISCC/REDCERT or NTA8080 will not demonstrate proportions of gas claimed under the GGSS. GoO will hold that information.

Ofgem should engage further with the operators of industry-led green gas registries to develop a shared understanding of the processes within those registries and terminology used.

- *Documentation or correspondence from the Department for Transport (DfT) pertaining directly to the RTFO scheme*

It is extremely unlikely that the producer will have a relationship with the DfT or any interaction with the RTFO scheme.

- *Screenshots from the RTFO online system demonstrating total annual volume claimed*

This system is called the RTFO Operating System (ROS) and not the RTFO online system. Ofgem guidance should be careful to use the correct terminology to avoid confusion.

It is extremely unlikely that the producer will have access to the ROS which will be used by the operator of a fuel duty point further down the chain of custody.

Further details on the structure of the report

"7.10 We will provide guidance setting out further details on the structure and requirements of the report."

We strongly suggest that these "further details" include definitive lists (or at least indicative lists) of the documentation types that are expected to be assessed.

Clarity of language

"7.13 The requirements for participants to demonstrate that RTFCs are not received for the same consignment(s) of gas for which they are receiving GGSS payments above"

The language of the full guidance needs to reflect the fact that biomethane producers would be very unlikely to receive a RTFC in any circumstances and that in any dual claim they would have sold the biomethane to another counterparty who would made the RTFC claim. The audit must focus on the interaction of the producer with their immediate counterparties and if those interactions create the possibility that their counterparties or any further counterparties could claim an RTFC.

Dual claiming between GGSS and subsidy and obligation mechanisms outside the UK

<p>This consultation is understandably focused on dual claims between the GGSS and RTFCs. However Ofgem should also be aware that there are equivalent schemes to the RTFO in operation in other countries e.g. Netherlands² and Germany, where UK biomethane production may be eligible to be rewarded. Biomethane rewarded under non-UK obligation schemes would almost certainly be traded via PoS certificates so many of the above processes will apply.</p> <p>Data sharing with the ROS system will not help with assurances in this area but Ofgem should monitor the development of the European Union's Biofuel database and assess if it can provide a tool to show which UK producers are supplying biomethane into non-UK obligation schemes.</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>No Comment</p>
<p>22. Do you have any comments on the process for addressing overpayment?</p>
<p>No Comment</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>No Comment</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>No Comment</p>
<p>25. Do you have any additional comments on how we will administer the change of registration process?</p>
<p>No Comment</p>
<p>26. Do you have any comments on the process for withdrawing from the scheme?</p>
<p>No Comment</p>

² <https://www.epure.org/about-ethanol/fuel-market/overview-of-biofuels-obligations-in-the-eu/>

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