

Ofgem consultation on Administration of the Green Gas Support Scheme – Energy Networks Association response

ENA RESPONSE

Energy Networks Association represents the companies that operate and maintain the gas and electricity grid network in the UK and Ireland. Serving over 30 million customers, they are responsible for the transmission and distribution network of “wires and pipes” that keep our lights on, our homes warm and our businesses running.

This response has been written in collaboration with ENA’s gas network member companies.

Background

ENA members consider that if our power, heat, transport, waste and industrial sectors are all interdependent, then so must the solutions for their decarbonisation. Solutions will be driven locally as well as nationally. There are a number of areas that industry and government can focus on with the right regulatory support to accelerate economic recovery and deliver a carbon neutral future. We are actively working with Ofgem and the government to support this.

The scale of the challenge ahead is vast. The networks are looking to the future and the ‘difficult to reach’ sectors – including heating - which we need to decarbonise to fulfil our Net Zero obligations. Through Energy Networks Association’s Gas Goes Green programme, Britain’s gas network companies have made clear their commitment to creating the world’s first zero carbon gas grid, here in the UK, and to delivering the innovation projects needed to tackle the operational and technical challenges associated with the deployment of hydrogen and biomethane.

Through Gas Goes Green ENA’s gas network member companies have set out a vision for 2050 and a pathway to deliver it. The balanced energy system pathway at the centre of this vision is comprised of four core elements, which work together to reduce the overall cost and disruption of decarbonising the energy system:

1. Low carbon and renewable gases supplied for all end-users
2. Continued electrification
3. Carbon capture, utilisation and storage
4. Energy efficiency

These four elements are discussed in further detail in the Pathways to Net Zero report which sets out our implementation plan to 2050¹.

To date, gas networks companies have made progress along this pathway by supporting the connection to the gas network of over 100 biomethane plants. The sector is capable of injecting 8.67TWh of biomethane into the grid each year, which is enough to heat more than 700,000 homes or 3% of gas network annual heat demand.

The ENA and its members welcome the introduction of the Green Gas Support Scheme to continue the support for biomethane production from anaerobic digestion and government recognition of the important role green gases have in meeting net zero. While the ambition of Gas Goes Green is for far greater volumes of biomethane than the scheme expects to support, it is a welcome commitment, as is this consultation from Ofgem to ensure that the administration of the scheme delivers on the government’s ambition and the promise of the biomethane industry.

¹ Navigant, *Pathways to Net Zero* (2019) available at <https://www.energynetworks.org/assets/files/gas/Navigant%20Pathways%20to%20Net-Zero.pdf> 5

Select consultation questions and responses

Question 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.

Any requirements (pressure and hydrostatic testing, telemetry etc.) need to be further defined if they are to be helpful in aiding demonstration of commissioning and to ensure there is a clear and shared understanding of requirements between producer, gas network and regulator.

Instead of the various requirements set out in the consultation we recommend that confirmation from the relevant gas network companies should instead be used to demonstrate that necessary standards, practices, procedures and tests have been successfully completed, in accordance with industry standards and practices referred to in our response to question 4, below.

Question 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.

The gas network view of the required industry standards and practices to demonstrate plant as commissioned is determined by IGEM GL5 Edition 3 – Managing New Works, Modifications or Repairs to any plant or system associated with the supply of fuel gas, and by IGEM/TD/16 Edition 2 which ensures that a network commissioning team is “properly trained, assessed as competent and certified as such by a recognised industry body”.

Implementation of the IGEM GL5 Edition 3 standard ensures compliance with all applicable health and safety Atmospheres Regulations, Electricity at Work Regulations, Gas Safety (Management) Regulations, Pipeline Safety Regulations and the Pressure Systems Safety Regulations. Adherence to these regulations will be common for all biomethane plant or the Delivery Facility Operator (DFO) that is commissioned.

Although the gas networks have their own versions of IGEM GL5 (PS6/G17) to account for different approaches to Remote Operable Valve (ROV), telemetry, odourisation processes etc., IGEM GL5 is the recognised industry standard to which all network-specific forms and certification that is completed must comply.

IGEM GL5 Edition 3

- a) For all assets upstream of the ROV Part D will need to be completed and signed off by a competent commissioning engineer.
- b) Gas networks will need to complete and have signed off by a competent commissioning engineer their sections, usually those relating to telemetry & ROV certification.

Safe Control of Operations – i.e. Non-Routine Procedure (SCO4)

- a) For DFO assets documentation is required to be completed and signed off showing capability of serviceable DFO assets to network ROV. This function demonstrates capability of operating and passing gas into the GDN system.
- b) Network SCO4 documentation shall be completed and approved in preparedness for the commissioning of network assets (i.e. ROV) to support gas flows into the system.

While the developers of a biomethane plant will have their own set of responsibilities, standards and practices we believe the above industry standards and practices are correct for commissioning biomethane plant and that continuing to follow this approach is appropriate to ensure networks conform to their legal responsibilities.