

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:	Air Liquide Advanced Business & Technologies UK Ltd
Organisational Type:	Biomethane Producer
Completed by:	D Hurren
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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.
<p>Agree. Though to be noted that you have not requested copies of payment schedules before but instead proof of payment, which given that the DNO has agreed an agreement should be sufficient.</p> <p>The request for EPC agreements has always seemed premature as especially on an</p>

extended build period it wouldn't normally be prudent to sign an EPC agreement until the provisional Tariff Guarantee was provided. It might have worked at end of RHI with build at risk, because of timescales. It might present difficulties now.

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.

I think the existing process is made unnecessarily complicated & heavy. Whilst you have listed a whole series of IGEM documents, many of which related to Gas Network Operators these cover the standards that will be audited and reviewed by a Gas Network Operator before they provide permission to inject. They will also audit the suitability of gas to transport before accepting gas into the Grid. In recent projects we have obtained from the Gas Network Operator a letter of confirmation of commissioning for the supply of Gas into the Network which would appear to satisfy many of these needs more simply. If you then add the commissioning details for the Anaerobic Digestion/ generation of the gas then you will have core information needed.

In terms of standards then we could list core legislation that in many cases is covered by meeting IGEM requirements if applied through all the upgrade equipment however not sure that would help clarity of the process.

We do not understand the request below (and not sure its what is needed)
Telemetry system Documentation showing installation and full end-to-end testing of the telemetry system installed and commissioned for the anaerobic digestion biomethane plant.

So for gas to grid systems there is a telemetry system that has to be tested because it ties into information flow for the gas network, and will be part of the approvals referenced above from DNO.

Many plants do not have integral control systems for the AD and Biomethane upgrading. Not quite sure why you would need to prove capability to send signals off site for this either?

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.

As per above - simplify the process and prevent repetition.
The DNO is controlling gas into the grid. Get them to approve the system as being safe and suitable to inject gas to grid and that it has been commissioned. They have far more expertise and spend much more time on this already. It seems highly inefficient for OFGEM teams without required competence to do this work.

<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>The definition of producing Biomethane is effectively changing the state of a gas to produce the purified gas - CO₂, O₂, H₂S, VOC removal included. What you are definining here also encompasses previous production of Biogas that was then further processed on site to produce Biomethane. For applicants an ability to have clarity of what is eligible or not at the start of a project will be essential. So hypothetical would be take a site that has previously produced Biogas for electrical purposes. If a new AD chain and completely new Biomethane upgrading equipment is put onto the same site then is that a valid base for application?</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>This approach appears to have broad consistency with NDRHI approach previously used and some consistency is vital for continuity. If there are significant variations in any area then post confirmation then some workshops for prospective applicants would be most welcome.</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>Payment by calendar quarter is much more preferable and welcomed. When you mention participant do you mean registered legal entity? Payment to one account per registered legal entity seems reasonable.</p>
<p>8. Do you have any comments on the proposed process for submitting injection data?</p>
<p>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?</p>
<p>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?</p>

11. Do you have any comments on the overall arrangements for reporting on the waste and fossil fuel content of feedstocks?
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.
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.
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.
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.
In reality most businesses claiming RTFO will be producing gas from waste and so Sustainability reporting will be quite light. But preferable to have one set of audits for a plant.
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.
We are looking to ISCC audit our Biomethane supply chain but no reason the work should not be complimentary to feed the report.

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?
Same approach as we have been using for past 2 years. We have clear documentation of what has been claimed to DfT which usually will have happened in advance of any RHI or GGSS claim.
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.
The work done by OFGEM on the RHI/RTFO interaction this time round is excellent. The engagement and information on the new systems is exactly the approach to follow.
20. Do you have any additional comments on our proposed administration of GGSS/RTFO interaction?
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.
22. Do you have any comments on the process for addressing overpayment?
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.
Just a request that there is a clear right of review process defined with all the steps along with expected times to respond & react, and also defining how long a producer has to request a review.
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.
The process has to be extremely clearly defined as it will form the basis then for the legal terms of any interaction between old and new, so there can be no ambiguity on how the process would be applied, including then in such a determination on who has a rights to trigger a review for prior periods.
25. Do you have any additional comments on how we will administer the change of registration process?

26. Do you have any comments on the process for withdrawing from the scheme?
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?
<p>Suggest reports should be as light as possible. Should give a clear idea how well sector is doing in terms of actual vs planned production.</p>
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.