

Decision

Administration of the Green Gas Support Scheme - consultation decision

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Ofgem has been named by the Department for Business, Energy and Industrial Strategy (BEIS) as the intended administrator of the Green Gas Support Scheme (GGSS) and associated Green Gas Levy (GGL). BEIS consulted on the proposed policy, and issued the subsequent government response, in March 2021¹.

On 5 July 2021 we published a consultation seeking stakeholder views on our proposed administration of the Green Gas Support Scheme (GGSS), which is expected to launch in autumn 2021. This document summarises the responses to our consultation and details our final administrative position. Where relevant, we also explain where we were unable to incorporate suggestions due to these aspects being mandated in the GGSS Regulations or representing BEIS' policy position as set out in the "Future Support for Low Carbon Heat & The Green Gas Levy: Government response to consultations".

¹ <https://www.gov.uk/government/consultations/future-support-for-low-carbon-heat>

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1. Introduction

Context and related publications

1.1. In March 2021, the Department for Business, Energy and Industrial Strategy (BEIS) issued the “Future Support for Low Carbon Heat & The Green Gas Levy: Government response to consultations”² (“the Government Response”) on the proposed Green Gas Support Scheme (GGSS) and associated Green Gas Levy (GGL). This was in response to the “Future Support for Low Carbon Heat”³ and the “Proposals for a green gas levy”⁴ consultations, which closed on 7 July 2020 and 2 November 2020, respectively.

1.2. Ofgem (‘we’, ‘us’ and ‘our’ in this document) will be the administrator of the GGSS and GGL. On 5 July 2021 we published a consultation seeking stakeholder views on certain aspects of our proposed administration of the GGSS. We did not consult on all aspects of scheme administration on the basis that certain aspects will be mandated in the GGSS Regulations, or are explicitly stated as representing BEIS’ policy position in the Government Response. This document summarises the responses we received and details our final position on the questions we consulted on. Where relevant, we also explain where we were unable to incorporate any suggestions made due to these aspects being mandated in the GGSS Regulations or representing BEIS’ policy position as set out in the Government Response.

1.3. For the purposes of this document, we have assumed the draft as laid before Parliament on 9 September 2021 will be made and come into force without any amendment.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970565/green-gas-levy-future-support-low-carbon-heat-govt-response.pdf

3

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/88736/future-support-for-low-carbon-heat-consultation.pdf

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/919901/consultation-green-gas-levy.pdf

1.4. A list of related publications is detailed below:

- [Consultation on Ofgem’s administration of the Green Gas Support Scheme](#)
- [Draft Green Gas Support Scheme Regulations 2021](#)
- ['Future support for low carbon heat' consultation](#)
- [Future Support for Low Carbon Heat & the Green Gas Levy: Government Response to Consultations](#)

Our decision-making process

1.5. We received 15 responses to our consultation from a variety of stakeholders including biomethane producers, gas shippers and industry bodies. Once the consultation closed, all responses were collated and reviewed. All responses were considered, and decisions were made on all the questions we presented in the consultation. A full list of respondents can be found in Appendix 1, and all responses, except from those from respondents who requested to remain confidential, can be viewed on our website.

1.6. This decision document outlines our final position on the areas of our administration detailed in the consultation. We address each question in turn and summarise the stakeholder responses received. This is followed by our response to the points raised and a decision on our administration. We have also answered some of the questions posed by respondents.

1.7. There were a number of responses in which comments were made on BEIS’ policy position or on the scheme regulations. Where relevant, we have noted these comments, but have made clear that we do not have discretion over these areas.

1.8. In developing our final administrative approach, we carefully considered all of the points raised by respondents, even if they are not specifically mentioned in this consultation response.

Your feedback

General feedback

1.9. We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this report. We’d also like to get your answers to these questions:

1. Do you have any comments about the overall quality of this document?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand? Or could it have been better written?
4. Are its conclusions balanced?
5. Did it make reasoned recommendations?
6. Any further comments?

Please send any general feedback comments to Future.HeatPolicy@ofgem.gov.uk.

2. Making an application

Section summary

This section covers our proposed administration of the application process, from an initial application for a tariff guarantee and the Stage 1 process through to demonstrating that a plant has been commissioned and being registered on the scheme.

Questions

Question 1: Is there any additional information that you think should be included in Provisional tariff guarantee Notices (PTGNs)?

Question 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.

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.

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.

Question 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.

Question 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.

Question 1

Is there any additional information that you think should be included in Provisional tariff guarantee Notices (PTGNs)?

Summary of responses

2.1. Nine respondents provided a response to this question, with five of those providing suggestions for additional information that should be included in a PTGN.

2.2. Three respondents stated that the PTGN should include an estimate of how long Stage 2 should take to be approved. Two respondents further suggested that the PTGN should state the expected injection date and the latest date by which commissioning must have occurred.

2.3. Two respondents made further comments on the overall Stage 1 process. These included concerns that changes to planning permission during the development of the project would be treated too rigidly by Ofgem, requiring applicants to provide justification for minor changes. These respondents noted that there should be a focus on proportionality, and that only the equipment used to produce biomethane for injection should be considered in relation to planning changes. It was suggested that changes not affecting the quantity of biomethane being produced, such as layout changes, should be excluded from the requirement to inform Ofgem of planning changes. We have addressed this point in our response to Question 2, below.

2.4. The same respondents also queried the requirement to provide a declaration of ownership. They noted that some current business models involve arrangements between a number of parties, and queried whether the scheme should exclude these arrangements.

Ofgem response & final administrative approach

2.5. Our experience administering the Non-Domestic Renewable Heat Incentive (NDRHI) scheme has shown that review times for Stage 2 can vary considerably, and this is often dependent on the information provided by the applicant. It is therefore difficult to provide an estimate of how long Stage 2 may take, and we do not intend to include this in the PTGN. One way review times could be reduced is by ensuring that applicants are aware of the evidence that must be provided at Stage 2 as this will help avoid requests for additional

information. We will therefore include additional detail in the PTGN on what evidence must be provided at Stage 2. This will also be clearly set out in guidance.

2.6. In response to queries over different ownership models, we confirm that we will not require a declaration of sole ownership at the point of application. However, we will need to see appropriate evidence of who owns and operates the equipment used to produce biomethane. If the equipment used to produce biomethane is owned by more than one party, we will also request confirmation from each of the parties that they wish for the equipment used to produce biomethane to be used for the purposes of an application to be registered onto the scheme.

2.7. Some participants suggested that the expected injection date and commissioning deadline could be included in the PTGN. We will include this information in the PTGN.

Question 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.

Summary of responses

2.8. Ten respondents provided a response to this question. Nine respondents broadly agreed with the proposed approach to tariff guarantees, with three of those offering no further comment. Of those who provided further comment, three respondents voiced concerns about the evidence requirements at Stage 1.

2.9. One respondent stated that the evidence requirements at Stage 1 should be reduced, in particular that it should be sufficient to provide evidence of applications for planning permission and grid connection, with evidence of those being granted not being required until Stage 2. Three respondents noted that Stage 1 is too early to ask for EPC agreements.

2.10. One respondent raised concerns that the requirements of Stage 1 are excessive and that the requirement to demonstrate that planning permission has been granted and that connection agreements have been entered into should be moved to Stage 2.

2.11. Two respondents expressed concerns about the proposal to verify applicants prior to an application being submitted. They noted that this process could delay an application being submitted.

2.12. Regarding Stage 2, three respondents commented that on the NDRHI scheme it takes too long to review Stage 2 applications and asked that timelines should be more clearly communicated to applicants. Respondents also commented that on the NDRHI scheme there was often duplication of requirements, citing incidents of applicants being asked questions on the same piece of evidence several times.

2.13. Two respondents commented that throughout the process, and especially at Stage 2, it can be unclear what documentation will be required. They suggested that there should be a clear, prescriptive list of what documentation is required and that any additional documents are requested as early as possible. Concerns were raised that some of the language in the consultation was ambiguous, for example the requirement for ‘additional specific evidence’ and the reference to ‘land agreements, land registry, EPC contracts and fuel supply agreements’. The respondents noted that not all of these may be necessary to reach financial close and would depend on the nature of the project. Additionally, the same respondents stated that any changes to the evidence requirements set out in guidance should be managed through a transparent process and/or consultation.

2.14. Two respondents also suggested that there should be greater flexibility in the kind of documents accepted during Stage 2, reflecting the different ways projects may be funded.

2.15. Two respondents commented that Ofgem should carry out a more thorough review of financial audits in order to provide more robust assurance that sufficient funding has been secured. They raised concerns that tariff guarantees may be allocated to projects which may not actually have reached financial close, meaning the budget cap may be breached prematurely.

2.16. Concerns were raised by two respondents over the application window (2021-2025). They noted that the evidence needed for submitting a Stage 1 application can take up to 18 months to obtain, meaning that most early applications will be from projects originally started with the aim of securing RHI support, i.e. where much of the planning has already been completed. These respondents suggested that completely new projects may not be able to secure GGSS funding until post-2022/3, which may favour established companies and projects and potentially disadvantage new entrants to the market. They suggested that

reducing the evidence requirements for stage 1, and shifting evidence to Stage 2, could support a fairer application process for new biomethane plants.

2.17. Regarding the interaction between tariff guarantees and budget caps, two respondents suggested that tariff guarantee and budget reporting should be published more frequently than quarterly.

Ofgem response & final administrative approach

2.18. The evidence required for us to issue a tariff guarantee are set out in the GGSS Regulations, and we are unable to reduce these requirements. This includes evidence that a connection agreement has been entered into and that planning permission has been granted, both of which provide us with assurance that the project has the necessary permissions and agreements in place to proceed. We do not consider evidence that applications for planning permission and connection agreements have been submitted to be sufficient.

2.19. Some respondents indicated that they believed a Network Entry Agreement was required at Stage 1, however this is not the case. To clarify, applicants will need to have a connection agreement between the Network Operator (DNO) and themselves signed and in place for Stage 1, but the Network Entry Agreement is not required until Stage 3 (application for registration). We will ensure this is clearly stated in the final guidance.

2.20. We acknowledge the concerns raised that applicant verification may hold up applications, in particular preventing a Stage 1 application from being submitted or approved, and therefore potentially affecting the applicable tariff. The verification process will not need to be completed for a Stage 1 application to be submitted or approved, and can instead occur in parallel to this stage (providing all the correct information has been submitted). However, an applicant must be fully verified in order to submit an application for registration (Stage 3).

2.21. We always aim to process applications as quickly as possible, but each application is dealt with on a case-by-case basis, taking into account all information specific to the individual case. We also have a responsibility to ensure that robust checks are carried out, and it is particularly important on GGSS to ensure that budget is not allocated to projects that may not proceed to commissioning.

2.22. We received comments from other respondents stating that the Stage 2 review process should be strengthened to ensure that projects which are unlikely to progress to completion do not receive tariff guarantees and take up budget. On the NDRHI scheme we have robust checks in place for Stage 2 applications, which will be replicated on the GGSS, and we do not believe that these need to be strengthened further. The GGSS Regulations require Ofgem to issue a tariff guarantee at the end of Stage 2 if financial close has been reached; “financial close” is defined as the date on which the applicant has entered into all financing agreements in relation to all the funding required for the production and injection of biomethane. We are not required to ensure compliance with funding agreements and to ensure the payments have been drawn down after the agreement has been entered into. Undertaking more thorough checks would increase review times and cut into development time, meaning that projects may miss commissioning deadlines.

2.23. We will provide an indicative list of documents required at each stage of the application in our comprehensive guidance documents. However, these lists cannot be exhaustive because the information required will vary between biomethane plants.

2.24. We have designed our processes so that information should not be requested more than once during the application process. However, if submitted documentation raises further questions, we will ask for more information or further documentation in order for us to have full clarity on the application we are making a decision on.

2.25. We received a comment in response to Question 1 on our approach to changes to planning permission in the course of development. These respondents raised concerns that changes to planning permission would not be dealt with proportionately, and that relatively minor changes could affect the tariff awarded. We recognise that changes to planning permission may be required during development. We will continue to require applicants to provide details of any changes to planning permission, and these will be assessed on a case-by-case basis. In our experience as administrators of previous schemes, we have found that it is unusual that changes to planning permission will automatically result in an application for registration being rejected or impact on the tariff guarantee. However we still need to ensure that at the time of registering an applicant, the planning documentation provided is up-to-date and accurate. We will provide clear guidance on how changes to planning permission should be notified to Ofgem and we will also provide general guidance on the kind of changes to the biomethane production process that may impact the tariff awarded.

2.26. Our guidance documents will seek to consistently use industry standard terminology, and we will take the feedback we have received on board in this regard.

2.27. Regarding feedback on the length of time the GGSS will be open for, this was set out by BEIS in the Future Support for Low Carbon Heat consultation⁵ in April 2020 and was subsequently confirmed in the Government Response. This is not a something that we have the power to change, and any comments on this matter should be directed to BEIS.

2.28. The GGSS regulations specify that we will publish information on the remaining tariff guarantee budget each quarter. We agree that it will be beneficial to publish this more frequently and propose publishing this monthly. We will review this after scheme launch and may increase the frequency if we consider it would be beneficial for prospective applicants.

2.29. Concerns about the tariff guarantee queueing process were also raised in responses to question 28. Specifically, respondents were unhappy that smaller installations were able to secure their tariff guarantee ahead of larger installations in the event that the budget has limited space remaining. This matter is prescribed by the GGSS Regulations, and therefore is not within Ofgem’s powers to change.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/88736/future-support-for-low-carbon-heat-consultation.pdf

Question 3 and Question 4

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.

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.

Summary of responses

2.30. We received ten responses to this question. Five respondents agreed with the proposals, although two of those also provided an additional suggestion. Four respondents broadly disagreed with the requirements set out in the consultation and provided additional suggestions for improving the process. One respondent stated that they were not in a position to comment, but provided some observations on the proposals.

2.31. Four respondents stated that the proposals present a level of detail and evidence requirements that are disproportionately high. A theme in these responses was that Ofgem should not duplicate the work of gas networks who will audit documentation and the suitability of gas for transportation in the network before providing permission to inject. Respondents commented that confirmation of this from the gas network operator should be sufficient to meet many of the requirements.

2.32. Two respondents welcomed greater focus on what is required to demonstrate commissioning, but suggested that it should be sufficient for the developer to show that injection has commenced, and that the gas used to commence injection comes from the specified biogas plant. The same respondents suggested that a ‘lighter touch’ definition of commissioned should be implemented, and that if the digester and injection equipment is present and complete, this should be sufficient. They raised concerns that the level of evidence proposed will cause delays, cause projects to receive a lower tariff and increase the perception of risks involved in Ofgem’s administration.

2.33. There were three comments on the requirements for telemetry systems set out in the consultation, with respondents commenting that these were unnecessarily detailed and would not be relevant to all plants.

2.34. One respondent agreed with the overall approach, but stated that more leeway should be included in deadlines due to delays caused by Covid-19 and Brexit. They suggested that applicants should be able to apply for a 12-month extension if they can provide evidence of unforeseen delays.

Ofgem response and final administrative approach

2.35. Following feedback, we will look to streamline the commissioning evidence requirements. In our consultation, we listed each piece of equipment which we would expect to have been commissioned prior to registration. However, we would not necessarily require direct confirmation of commissioning for each of these to be provided as part of the application. If proof of commissioning has already been confirmed by the Gas Network Operator (GNO) as part of their normal process for agreeing a Network Entry Agreement (NEA), we may accept this confirmation as proof of commissioning of the relevant components instead. Our guidance documents will provide further details on the exact documents we expect applicants to provide and retain through their registration on the scheme. We would expect participants to retain the full suite of commissioning documentation for inspection in the event of an audit.

2.36. The requirements for demonstrating that a plant has commissioned will be clearly set out in guidance, but applications will be assessed on a case-by-case basis and it is not possible to set out an exhaustive list of which documentation we will require. It is also important to emphasise that if any commissioning evidence is unclear, we will request that applicants submit further evidence or information to enable us to make a decision on the application.

2.37. We received feedback on the proposals to include telemetry systems. Where they are not present, we would not expect to see documentation which demonstrates that they have been commissioned. Where they are present, we may request information pertaining to an installation’s telemetry system as supplementary evidence to help our review of the application.

2.38. We do not have discretion to extend statutory deadlines, such as the submission of financial close information. However, we will continuously provide feedback to BEIS, and will raise any major concerns or issues with regards to applicants’ statutory deadlines.

Question 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.

Summary of responses

2.39. We received nine responses to this question. Six responses indicated broad agreement with the proposals, one respondent disagreed, while two further responses did not provide a clear view.

2.40. Three respondents commented that guidance needs to be clear on exactly what equipment will be eligible for the scheme. Two respondents noted that guidance must be clear on plant expansions and the circumstances under which these may be excluded, and suggested that a list of examples in guidance would be useful. These respondents felt that the position on previously used equipment is clear, but that it is less clear how this applies to expansions or re-engineered plants. These respondents also sought greater clarity on what happens where part of the equipment has been used at another site and sold, with the original site ceasing to operate.

2.41. One respondent stated that it is imperative that Ofgem clearly establishes a definition for ‘new plant’. They also noted that since integral equipment includes the anaerobic digester, there should be a more detailed definition of ‘anaerobic digester’, constraining the definition to a fixed list of items. They commented that it is unclear whether the definition will include additional equipment external to primary and secondary digestion tanks such as pumps, pipework, secondary containment areas and CHPs providing heat and/or power to the digesters.

2.42. One respondent commented that opportunities to share equipment pertaining to feedstock and digestate management with existing AD plants should be encouraged.

2.43. One respondent who disagreed with the proposals stated that odorant and propanation equipment should not be considered integral and that if it can be recycled from other installations this should not be prohibited. They suggested that where it can be proven that owners of equipment have gone out of business, and withdrawn from the NDRHI scheme, it is wasteful to remove functioning equipment from circulation.

Ofgem response and final administrative approach

2.44. While we acknowledge the desire for applicants to seek as much certainty as possible prior to installing their equipment and making an application, we must make it clear that each application will be reviewed on a case-by-case basis, taking into account all relevant factors and available information. The guidance documents we issue will be as comprehensive as possible, but are not a substitute for applicants obtaining their own independent legal and technical advice. Further, applicants who proceed without such advice do so at their own risk.

2.45. The regulations state that the equipment used to produce biomethane must not be, or have been, used for the purposes of a NDRHI registration at any time; be used for an application for a tariff guarantee on the NDRHI scheme and not withdrawn prior to the GGSS Regulations coming into force; and must not have been used to produce biomethane or biogas prior to the GGSS regulations coming into force.

2.46. The definition of “equipment used to produce biomethane” is given in the GGSS Regulations as “the equipment integral to the production of biomethane for injection, including any anaerobic digester”. We consider the following to be ‘integral to the production of biomethane’:

- Equipment required to convert raw biogas into biomethane suitable for injection
- CO₂ and oxygen removal
- Pressurisation equipment
- Propanation
- Odorant equipment
- Anaerobic digester

2.47. Further guidance will be provided in our guidance documents. Applicants are encouraged to seek their own legal and technical advice in advance of making an application.

2.48. “Anaerobic digester” will be defined in the GGSS Regulations as “a plant which produces biogas by anaerobic digestion”. In response to queries received on this definition, we would not consider feedstock treatment and pre-processing equipment and digestate treatment equipment to come under this definition.

2.49. The GGSS Regulations will not permit the re-use of equipment which is considered integral to the production of biomethane, even in the case where the original producer has gone out of business. Both NDRHI and GGSS schemes have provision for change of registration which can be used to transfer the ownership of an entire biomethane installation in this event, but individual components may not be salvaged and re-used for the purposes of a new registration on the GGSS.

2.50. BEIS’ Future Support for Low Carbon Heat & The Green Gas Levy: Government response to consultations stated that conversions from existing CHP installations would not be eligible at this time.

2.51. It is still the case that an existing biogas CHP installation which is simply converted to produce biomethane for injection will not be eligible if the equipment which is integral to the production of biomethane has been used prior to the GGSS Regulations coming into force. However, as the CHP unit itself is not considered integral to the biomethane production process it could be re-used or re-purposed for use in an eligible installation.

2.52. An installation may also be eligible for the scheme even if it shares equipment that is not included under the definition of “equipment used to produce biomethane” with another installation, such as utilising heat from an existing CHP unit at another installation to heat the applicant installation’s anaerobic digester.

Question 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.

Summary of responses

2.53. We received eight responses to this question. All eight responses were in broad agreement with the proposals. Four respondents welcomed consistency with the approach taken on NDRHI.

2.54. One respondent proposed that a pre-application “consultation process”, prior to Stage 1, would be useful.

2.55. Two respondents commented that there should be a clear distinction between information that is needed to accompany an application (and therefore to be considered ‘properly made’) and what might be required subsequently. They stressed the importance of ‘properly made’ in securing a tariff guarantee at a certain time, so the information required to be provided should be clearly and unambiguously set out.

2.56. Two respondents queried the requirement to provide feedstock details in paragraph 2.28 of the consultation, commenting that it was unclear whether this is in addition to the FMSQ. They raised concerns that requiring this information could delay the assessment of applications should the information change.

2.57. The same respondents also queried the benefit of requiring applicants to demonstrate that the gas being injected meets HSE requirements as all requirements relating to safety and consumer protection must have been met for the gas transporter to allow flow into the network. They commented that this appears to be unnecessary duplication.

2.58. Two respondents agreed with the overall approach, but stressed the need for a flexible approach and the need to avoid stifling innovation. One respondent raised concerns that ‘too prescriptive’ an equipment list attached to the commissioning requirements could stifle innovation, for example by not allowing new types of digestion technology.

Ofgem response and final administrative approach

2.1. We recognise that providing clear guidance on what documentation we will expect to see as part of an application for registration is important. It provides clarity to industry and transparency as to our review criteria, and gives applicants a platform to submit good quality applications. We will clearly set out in guidance what documents and evidence we expect to be provided during this stage of the application. This will help avoid delays where we have to subsequently request additional information.

2.2. However, our experience on NDRHI has shown that it is difficult to provide an exhaustive list that will cover all circumstances, and applications will be assessed on a case-by-case basis. We will therefore be unable to provide a prescriptive list of all evidence and documents that will allow us to determine the eligibility of an application.

2.3. In response to the query about duplication of feedstock information, we will only require this to be provided as part of the FMSQ, it will not need to be provided separately.

2.4. As stated in our response to questions 3 and 4, we will look to streamline the evidence requirements in areas where we are confident that the industry has already checked. We will therefore not require applicants to provide evidence that the HSE requirements on gas safety and any consumer protection conditions have been met in the first instance. We understand that these must have been demonstrated to the gas network to allow gas injection to the grid. We may still request this information at application if we have any specific queries. Participants should also retain this documentation for inspection in the event that they are subject to an audit.

2.5. In response to concerns about stifling innovation, particularly around new types of digestion technology, the GGSS Regulations will be clear on the technology that will be permitted on the scheme, and we do not have any flexibility around this.

2.6. While we understand that applicants will be seeking as much certainty as possible, our role as administrator does not extend to providing case-specific advice in advance of an application being made. We would encourage applicants to refer to our guidance documents, and seek their own independent legal and technical advice if they are still uncertain.

3. Periodic Support Payments and Periodic Data

Section summary

This section covers how we will make payment to scheme participants and how periodic data should be provided to us.

Questions

Question 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.

Question 8: Do you have any comments on the proposed process for submitting injection data?

Question 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.**

Summary of responses

3.1. We received nine responses to this question. Eight respondents agreed with the proposals, while one disagreed.

3.2. Of those who agreed, three also commented that they would welcome assurances that payments would be processed in a timely manner. One respondent noted that experience on the NDRHI scheme has made industry wary of Ofgem’s ability to process complete payments in a timely manner. The same respondent also recommended that Ofgem should maintain sufficient headroom in the budget to account for unforeseen events and to ensure GGSS payments are made on time.

3.3. One respondent disagreed with the proposals and objected to the delay to the initial payments while the levy is not collecting funds for the first quarter. They recommended

that Ofgem should look into automation and faster processes, and should consider making monthly payments.

Ofgem response & final administrative approach

3.4. We welcome the general consensus on the proposed administrative approach to periodic support payments.

3.5. We note the comments around payment timescales, and the potential for delays. This is something we will seek to avoid and will ensure there is adequate resource to process payments correctly and promptly. We will also provide a timetable in our guidance which will provide the key dates for data submissions and payments to help participants manage their registration.

3.6. Our guidance will include an example timetable which shows the dates for submission and payment.

3.7. With regard to suggestions that we involve greater levels of automation to our processes to speed payment timescales up, this is something we will look to implement in the development of the new GGSS online portal. We intend to more closely integrate the payments process with the digital service, which will allow participants greater visibility, but this will not be in place from scheme launch.

3.8. The GGSS Regulations specify that payments will be made quarterly. We understand the reasons why respondents may prefer monthly payments; however, it is not within our powers to alter this schedule.

3.9. We also note the comment regarding a budget headroom. Both GGSS and GGL have mechanisms in place to cover any shortfall in funding, and this matter is covered further in our response to Question 28, and in our consultation on the GGL.

Question 8

Do you have any comments on the proposed process for submitting injection data?

Summary of responses

3.10. We received seven responses to this question. Four respondents commented that Ofgem should investigate securing access to Xoserve or Gemini data directly, either to check the data submitted or to integrate Xoserve/Gemini data directly into GGSS accounts. All four of these respondents noted that such integration is already in use in other European countries.

3.11. One respondent commented that unless integration with Xoserve/Gemini systems is introduced, the data requirements should be adjusted to the minimum needed to approve the quantity injected (for example, just the kWh of energy injected).

Ofgem response and final administrative approach

3.12. We do not have the discretion to reduce the data requirements to the minimum needed to approve the quantity injected. As well as the amount of biomethane injected that a participant wishes to claim GGSS payments on, the GGSS Regulations will also require participants to provide us with the GCV of the biomethane and any propane injected. Participants will also be required to provide us with a figure for the total volume injected (including any biomethane that is not being used to claim GGSS payments) to ensure participants have not breached their maximum injection capacity and are abiding by the rules regarding the interaction with the RTFO.

3.13. We acknowledge that some producers would prefer that Ofgem access injection data directly from Xoserve rather than through manual submissions. However, injection data is just one of the pieces of information we require in order to calculate payments. Information such as the amount of propane added and any heat used in production cannot be automated, and our current position is that there is limited value in Ofgem directly accessing injection data when participants are also required to provide additional information in order for us to calculate payments. We will therefore expect participants to provide injection data to us directly. However, we will continue to review this position as the scheme progresses, taking into account cost and resource effectiveness.

4. Feedstock Requirements and Sustainability Reporting

Section summary

This section covers the GGSS feedstock and sustainability requirements, and how we propose to administer participants’ reporting obligations.

Questions

Question 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?

Question 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?

Question 11: Do you have any comments on the overall arrangements for reporting on the waste and fossil fuel content of feedstocks?

Question 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.

Question 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.

Question 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.

Question 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?

Summary of responses

4.1. We received nine responses to this question. Five respondents agreed with the proposals and did not offer any suggestions on how the process could be improved. Three respondents provided a number of suggestions for improvements. One further response was not relevant to the question.

4.2. Suggested improvements were generally around increasing flexibility and speeding up the process. Two respondents suggested that there should be greater flexibility to allow for changes in feedstock output over time to allow for adaptation to changing market conditions. They noted that on the NDRHI scheme it has often been very time-consuming to make changes.

4.3. The same two respondents recommended that there should be as much ‘up-front’ approval of feedstocks as possible, suggesting that the review period be removed and that a pre-defined list of feedstock categories is introduced. This could take the form of a public register of approved feedstocks, either managed by Ofgem or a third party, which would include definitive classifications, Fuel Classification Consideration (FCC) questionnaires, and GHG data for all approved feedstocks.

4.4. Two respondents suggested that participants should be allowed to include a much wider choice of feedstocks on the FMSQ (even where they may not be used immediately).

4.5. Two respondents commented that there should be some level of interchangeability with the RTFO scheme and that the processes for approval on the two schemes should be more closely aligned. They suggested that if a feedstock is approved on one scheme, it should automatically be approved on the other.

4.6. A further respondent suggested that it should be possible to change feedstock supplies in the FMS process.

Ofgem response & final administrative approach

4.7. There were a number of comments on 'up-front' approval of feedstocks. While most conventional feedstocks are well-established, it is not solely the feedstock itself that needs to be assessed in detail, but rather the associated processes such as fuel measurement. We would still need to consider these factors, and therefore do not believe that up-front approval of conventional feedstocks would add benefit for us or participants. Similarly, we do not intend to publish a public register of approved feedstocks and their associated classifications and GHG emissions values at this time. As we would still need to assess the processes associated with feedstock submissions, we do not believe that there would be sufficient benefit in terms of time savings to justify the cost of maintaining such a register. However, it is possible that an approval scheme for sustainable fuels may be developed by a third-party which would provide a list of feedstocks that meet the greenhouse gas criteria. Such a scheme would have to be approved by the Secretary of State, and where this occurs we would make an assessment of whether, and how, this could be implemented into our processes.

4.8. We note the concerns raised that FMSQs have been rejected for having too many feedstocks added. We would like to clarify that an FMSQ would not be rejected solely for this reason, and where a rejection has been received this would generally be due to an issue with the information provided for the processes around those feedstocks. Users are free to add as many feedstocks as they wish to the FMSQ, but they must also have set out fully developed processes and have included the necessary specifics such as fuel provenance.

4.9. We received a number of comments suggesting that there should be some degree of interchangeability between the processes for assessment and approval of feedstocks on the GGSS and RTFO schemes. Some respondents suggested that if a feedstock is approved on one scheme, it should automatically be approved on the other. We do not believe that it would be appropriate to implement such cross-scheme assessment of feedstocks. Our FMS processes are well-established, and are designed to give us the necessary assurance that the GGSS regulations are being adhered to. We cannot be confident that where a feedstock has been approved under a different scheme it will also meet our requirements and those set out in the GGSS regulations. Furthermore, we are aware that the two schemes will have different requirements for feedstocks and for the calculation and reporting of associated greenhouse gas values. For these reasons, BEIS made the policy decision not to align the requirements and allow automatic approval of GGSS feedstocks that have been approved on the RTFO.

4.10. In response to concerns about the length of time taken to review FMSQs, our processes need to be robust and comprehensive to ensure that we are implementing the GGSS Regulations correctly. Assessing the FMSQ involves more than approving or rejecting feedstock types; we also need to assess the processes that have been set out. However, we will continue to explore how flexibility in the FMS process can be improved for users.

4.11. We are looking to facilitate flexibility within the industry with regards to feedstock choice. Producers do not have to wait for FMSQ approval before they start to use a new fuel, however they assume the risk of non-compliance if the feedstock is not sustainable. This approach has been employed successfully on both the NDRHI and Renewables Obligation (RO) schemes. We request that participants review the information and evidence they submit to us. Ofgem cannot act as advisors to industry in this matter and cannot respond to speculative queries. Where the matter may appear complex we would recommend the participant seek their own technical and legal advice. Once a participant has determined whether they wish to purchase and use a new feedstock they should submit their revised FMSQ to us. Where a new consignment is going to be measured and sampled in line with existing procedures this makes the process a lot simpler. There will always be some cases that are complex which will need to be dealt with on a case-by-case basis due to the potential impact on payments.

Question 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?

Summary of responses

4.12. We received six responses to this question. Two respondents welcomed consistency with the process on the NDRHI scheme and did not provide any additional comments or suggestions. Four respondents provided comments on the FMS questionnaire, mostly around the lack of flexibility in the template.

4.13. Three respondents commented that the template is too rigid and is frustrating to use. Users have previously found it difficult to add large numbers of feedstocks due to the small table sizes. Two respondents also noted the lack of version control on the NDRHI, and

recommended that on the GGSS scheme participants should be able to see all documents they have previously submitted.

4.14. Two respondents queried some of the wording in paragraph 6.5 of our consultation, specifically the reference to ‘the energy content of the feedstock(s) used in a quarter’ and ‘the energy content of the ingredients added as part of the biomethane production process’.

4.15. One respondent commented that lack of alignment on feedstock evaluations between the NDRHI scheme and the RTFO presents a significant barrier to dual participation. They recommended that Ofgem should seek to align the FMS questionnaire more closely with the way feedstocks are assessed on the RTFO.

Ofgem response & final administrative approach

4.16. As in the response to the previous question, we recognise the need to make the FMSQ as user-friendly as possible. While we do need to balance this with the need for standardisation and certain restrictions are unavoidable, we intend to explore how the FMSQ can be improved, and would welcome any further suggestions from users. We would also like to remind prospective applicants that they are free to submit supplementary information outside the FMSQ itself.

4.17. We intend to introduce a facility in the GGSS register for users to view previous versions of documents they have submitted and to view submission dates. However, this facility will not be in place at scheme launch.

4.18. Regarding greater alignment with the way feedstocks are assessed on the RTFO, we reiterate our response in the previous question that our processes are specifically designed to provide us with assurance that the GGSS regulations are being adhered to, and we will not be seeking to align our processes more closely with those in place on the RTFO.

4.19. Paragraph 6.5 of our consultation included reference to the energy content of the feedstock(s) used in a quarter. The FMSQ will require participants who use more than one consignment of biomethane to report on the proportions of these consignments. We would expect that participants report this on the basis of the energy content of each consignment. Participants who use just one consignment of biomethane will not be required to report on the energy content of their feedstocks.

4.20. That paragraph also indicated that the FMSQ would also ask for the energy content of any other additives to the biomethane production process. This may still be the case for some installations because each FMSQ will be reviewed on a case-by-case basis. All reviews will take the specific evidence relevant to each installation into account.

Question 11

Do you have any comments on the overall arrangements for reporting on the waste and fossil fuel content of feedstocks?

Summary of responses

4.21. Three respondents provided additional comments on the arrangements for reporting on the waste and fossil fuel content of feedstocks. Two respondents noted that the wording of the 50% waste threshold in the consultation is unclear, and asked for clarity on this point. The same respondents also stated that the consultation is unclear on whether liquid co-products are excluded, although noted that this is a policy question for BEIS.

4.22. A further respondent commented that there should be no ambiguity over allowable feedstocks and also suggested that alignment with the RTFO would be helpful.

Ofgem response & final administrative approach

4.23. The wording of the 50% threshold was unclear in the consultation text. To clarify, participants may derive more than 50% of their energy from non-waste feedstocks, but if they exceed this threshold their periodic payments will be reduced.

4.24. The GGSS Regulations do not permit the use of liquid co-products as a feedstock on the scheme.

Question 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.

Summary of responses

4.25. We received eight responses to this question, all of which expressed agreement with the proposed approach to the greenhouse gas criteria. However, there were also several additional comments and requests for clarifications.

4.26. One respondent welcomed the consistency with NDRHI, but suggested that the apportioning tool could be pre-loaded with calculations to manage deductions or other calculations required by Ofgem.

4.27. Two respondents suggested that when averaging GHG values for feedstocks, the individual GHG figure should also be reported.

4.28. Two respondents requested clarity on whether waste consignments will automatically be deemed compliant with the GHG threshold, and also asked for clarity on how plants that use 100% waste will be treated and whether they will still need to report GHG emissions. The same respondents also queried whether there would be a ceiling for emissions values for individual feedstocks. Further clarity was requested by these participants on how the methodology will be aligned with RED II, including the bonus for raw manures.

4.29. A further comment was that Ofgem must be clear in guidance on what evidence will be required to support GHG emissions savings reported for carbon capture and storage.

Ofgem response & final administrative approach

4.30. We recognise the need for clear guidance on the greenhouse gas requirements, and we will issue detailed guidance on the requirements and how participants should report against them. The full methodology for calculating GHG emissions has been published separately by BEIS alongside the GGSS Regulations, and these will be aligned with the methodology set out in RED II. We will continue to work closely with BEIS to work through the likely implications of any changes, and recognise the need for clarity on this. We will

issue guidance which will explain the impact of changes, including on the use of carbon capture and storage and raw manures.

4.31. We will proceed with our proposal to require participants to provide a breakdown of the GHG saving figure as part of the periodic data submission, setting out the value for each feedstock as well as the final, aggregated value. Since the GGSS Regulations will require participants to provide a GHG figure for the biomethane produced, even where it is produced from waste, we understand that plants that use 100% waste will still have to report GHG values. There will not be a ceiling for individual feedstocks.

4.32. Regarding the suggestion that the apportioning tool could be pre-loaded with calculations to manage deductions, we believe that the current apportioning tool is fit for purpose. We do not intend to develop a new tool at this stage, but will continue to review the suitability of the tool and explore possibilities for improving it as the scheme progresses.

Question 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.

Summary of responses

4.33. We received seven responses to this question, all of which expressed agreement with the proposed approach. Three respondents also commented that more detail should be provided on how participants can demonstrate compliance with the land criteria for solid biomass. Another respondent suggested that information on best practice should be shared.

Ofgem response & final administrative approach

4.34. We will proceed with the proposed approach to the land criteria set out in our consultation. We will issue guidance to participants on how to demonstrate compliance with the land criteria, and will explore the possibility of including information on best practice.

Question 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.

Summary of responses

4.35. We received eight responses to this question, all of which expressed agreement with the proposed approach. Four of the respondents welcomed the consistency with the NDRHI scheme. One respondent noted that the quarterly data provided by participants is ‘secondary data’ in the form of copies or screenshots of Xoserve data. They recommended that the Annual Sustainability Report should explicitly require the auditor to check that the primary Xoserve data matches the data submitted to Ofgem during the year.

Ofgem response and final administrative approach

4.36. We are pleased to note the support for our proposed approach, in particular the desire for consistency between the GGSS and other environmental schemes we administer.

4.37. Currently we do not wish to add the explicit requirement for the auditor to check data directly from Xoserve to the Sustainability Audit Report checklist. The auditor can decide whether it is appropriate to do this. If there are inconsistencies with the quarterly data submissions, this will have wider ranging implications, for example on payment values. We therefore have checks and balances in place elsewhere in our processes to ensure this data is correct.

5. Interaction with the Renewable Transport Fuel Obligation (RTFO)

Section summary

This section covers our proposed approach to the interaction between the GGSS and the RTFO, including our proposals to require participants to provide independently assured information on their interaction with the RTFO.

Questions

Question 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.

Question 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.

Question 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.

Question 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?

Question 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.

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

Question 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.

Summary of responses

5.1. Eight out of nine respondents to this question agreed with our proposal to require annual, independently assured audit information as further validation of GGSS/RTFO interaction by biomethane producers.

5.2. Of those who agreed with the proposals, one stated that they supported the proposal because it would increase consumer trust in the sector and uptake of the Guarantees of Origin (GoO) scheme. Another stated that their support was due to a need to avoid "green-washing" and double counting of biomethane.

5.3. Two respondents stated that they supported the proposed approach, but commented that the process should minimise administrative requirements on producers. They suggested that this could be achieved by ensuring that auditors are able to demonstrate compliance by utilising data that is already readily available, rather than requiring them to access new software or systems. They also suggested that participants should have the option of opting out of the RTFO for a period of time, noting that there are installations which use certain feedstocks and injection rates which are unlikely to ever produce gas which goes on to be claimed against the RTFO.

5.4. Finally, one respondent stated that the process should be as light-touch as possible, and draw on all available information sources. They also suggested that there should be a requirement on ICSS accredited shippers to provide information directly to Ofgem which would confirm the mass-balancing of biomethane quantities, from grid entry to exit.

Ofgem response & final administrative approach

5.5. We intend to proceed with our proposal to require annual, independently assured audit information as further validation of GGSS/RTFO interaction.

5.6. One respondent suggested that it should be possible to ‘opt out’ of the RTFO for a period of time, during which a producer would not be required to submit the annual audit information we proposed in our consultation. While we recognise that some producers may not produce biomethane which is subsequently used to claim Renewable Transport Fuel Certificates (RTFCs), the ability to opt out of the process would undermine the level of assurance we require to ensure that no double claims are being made. We intend to take forward the proposed requirement that all biomethane producers registered on the GGSS must provide annual, independently assured audit information.

5.7. We recognise the need, expressed by three respondents to this question, for the process to be as streamlined as possible and to draw on existing sources of data. While we are still finalising the details of the process, we expect that independent auditors should be able to provide the necessary level of assurance using data that will be readily available as part of a participant’s normal record keeping. We do not believe that it will be necessary for auditors to access any additional information or systems.

5.8. We received an additional suggestion that there should be a requirement on ICSS accredited shippers to provide information directly to Ofgem, confirming the mass-balancing of biomethane quantities from grid entry to exit. Since we are unable to require shippers to provide this information it will remain necessary for the onus to fall on producers to provide the necessary assurance via an independent audit.

Question 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.

Summary of responses

5.9. Of the ten respondents to this question, nine agreed with our proposal to include the GGSS/RTFO interaction assurance as an additional section to the Annual Sustainability Audit Report, rather than as a standalone submission.

5.10. Of those respondents, three stated that this would streamline their obligations, making their submissions easier and reducing time spent on compiling audits.

5.11. One respondent supported the proposal, but noted that there may not be many suitable auditors in their area.

5.12. Another respondent who supported the proposal indicated that biomethane which is claimed against the RTFO is likely to be produced from waste and therefore existing sustainability reporting would likely be light-touch.

5.13. One respondent disagreed, stating that the skillset required to complete both reports is different. They suggested that we contact ISCC accredited shippers to provide this information instead.

Ofgem response & final administrative approach

5.14. Ofgem acknowledges the broad consensus that the GGSS/RTFO interaction assurance should be included as an additional section to the Annual Sustainability Audit Report and will proceed with the approach. We are pleased that respondents agree that it represents the most efficient approach, both for the producer and for Ofgem.

5.15. It is important to note that this approach will be in line with the approach taken on the Non-Domestic RHI scheme.

5.16. We would also like to emphasise that, as per paragraph 5.6, all producers will be required to submit this additional GGSS/RTFO assurance information.

5.17. We understand that there are concerns over the suitability of current sustainability auditors for completing this section, and that the skills for providing assurance on GGSS/RTFO interaction are different to those required for completing the Annual Sustainability Audit Report. This is addressed in our response to question 17.

5.18. Another respondent was concerned over the availability of auditors in their area. We acknowledge this concern, however, re-iterate that participants must take all steps to ensure they meet their obligations, including in this case sourcing a suitable auditor.

Question 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.

Summary of responses

5.19. When asked if both the GGS/RTFO interaction section and the Annual Sustainability Audit Report could be completed by the same auditor, five out of nine respondents who answered this question agreed.

5.20. Of those who agreed, two indicated that though this could work in principle, the auditor could encounter difficulties in accessing the correct documentation.

5.21. None of the remaining four respondents disagreed strongly with the proposal. One stated that it would depend on the specific documents and contracts the auditor would be asked to review when on site. Another indicated that the auditor would need to have a good knowledge of the Gemini system controlling gas grid entry and exit.

5.22. One respondent did not wish to comment on this proposal, but expressed their view that GGSS-registered sites should be exempt from the GGSS/RTFO interaction audit.

Ofgem response and final administrative approach

5.23. We are pleased to note that many respondents agreed that the same auditor could complete both audit sections. It reinforces the position taken in paragraph 5.14 that linking this process to the Annual Sustainability Audit Report submission will streamline producers’ obligations.

5.24. It will be up to producer whether they use the same auditor for all sections of the Annual Sustainability Audit Report or use a different auditor for the RTFO section. This should give producers flexibility to work in a way that suits their individual situation.

5.25. We believe that concerns raised over access to information stems from a misunderstanding of the documentation we would expect to see in the audit report. As a minimum, the auditor would only need to see documentation which the producer passed to

the first party in the chain of custody. This is elaborated further in our response to question 18.

5.26. It is the responsibility of the participant to appoint an auditor who is suitably qualified; however, we will provide clear guidance on what is required from the auditor and the participant.

Question 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?

Summary of responses

5.27. Nine respondents provided their view on the documentation which could be provided to an auditor to demonstrate that biomethane would not be claimed against both GGSS and RTFO. Two broadly agreed with the proposals in the consultation, five proposed some additional sources of documentation and/or evidence, while two expressed significant concerns with the process in general.

5.28. One respondent provided a detailed response which set out the information which could be available to different producers in different scenarios. This included GGSS claims, injection evidence, voluntary schemes and industry-led green gas registries and RTFO public reports published by DfT. Another respondent agreed that industry led registers and certification schemes could play an important role in demonstrating that biomethane is not double claimed.

5.29. Two respondents expressed concerns that producers and auditors would be expected to know what happens to biomethane after it has been injected and sold on. There were concerns that participants would have to “prove a negative”, i.e. provide proof that they had not claimed against the RTFO when it was not possible for them to do so. We would like to point out that this is not the correct interpretation of our draft guidance, and offer clarification in paragraph 5.40 below. Guidance will reflect this.

5.30. Those respondents also proposed that there should be an allowable margin for error due to the likely complexities of the calculations involved.

5.31. They also requested clarification on the rules on how different feedstocks may be apportioned across different schemes in a given quarter, specifically around allocating wastes.

5.32. One respondent indicated that their organisation would be claiming against both GGSS and RTFO directly, and therefore would be able to provide direct proof of what had been claimed under both schemes.

5.33. One respondent suggested that two sets of meters could be installed in parallel to record biomethane injected, one for GGSS and the other for RTFO. The producer could choose which scheme to record against and hold meter readings as evidence, together with Xoserve and Gemini data.

5.34. One respondent indicated that they felt this requirement would not be applicable for their installation. Please see paragraph 5.6 for an explanation why all producers will be subject to this requirement.

5.35. One respondent again suggested that Ofgem request this information from ISCC shippers. Please see paragraph 5.8 for our response.

5.36. Some feedback also requested that we share data with the DfT to check both the start and end point of the system.

Ofgem response & final administrative approach

5.37. An auditor should be able to access evidence and/or documentation demonstrating whether a biomethane producer has:

- i) claimed GGSS support for their gas
- ii) had gas not claimed for on GGSS and that has been sold on - allowing an RTFO claim by another party
- iii) split a claim for support between the GGSS and RTFO, and by what proportion.

5.38. We recognise some producers may never claim RTFO support, but we believe that this should make it relatively simple for an auditor to evidence this through injection data

and applicable contracts or agreements with the first party, stipulating that GGSS payments had been claimed on that gas.

5.39. We also recognise that producers who sell on gas to another party may not be able to present evidence about the whole contractual chain relating to that gas, or the activity of any other parties within that chain. For this reason, auditors will need to check the sale documentation between the first two parties in the contractual chain: the biomethane producer and the first trading counterparty. This contractual documentation must provide us with assurance that a producer is meeting their GGSS obligations by stipulating any GGSS claim and sustainability information relating to the consignment being sold. The scheme obligations clearly state that Ofgem may not make payment if an RTFC has been issued for the same gas⁶. This documentation should therefore provide assurance to an auditor that a producer is taking all reasonable steps against dual claims on their gas.

5.40. We are therefore not expecting all producers to have knowledge of the entire custody chain, nor are we asking them to prove they have not claimed RTFO (i.e. to prove a negative). However, all producers should be able to demonstrate they have met their GGSS obligations. Where a producer is involved in various stages of the custody chain of their gas, they should share this evidence with their auditor.

5.41. Please note: The timings of an GGSS claim and a subsequent sale is not sufficient assurance. It is feasible that an GGSS payment could be delayed for some reason, and that an RTFO claim could be made by another party and processed in the interim.

⁶ ‘Interaction with the Renewable Transport Fuel Obligation’, regulation 32A.-(2) [The Domestic Renewable Heat Incentive Scheme and Renewable Heat Incentive Scheme \(Amendment\) Regulations 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2021/1000/contents/instrument/part/2/regulation/32A/paragraph/2)

Question 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.

Summary of responses

5.42. Five of eight respondents to this question suggested different approaches to the proposed GGSS/RTFO interaction assurance audit report.

5.43. Three of those respondents suggested that we work directly with the DfT to verify the level of interaction between the schemes by collecting and sharing data. They stated this was to make the process less onerous for both producers and Ofgem, and to give a better level of assurance.

5.44. Another respondent suggested that auditors should have to check the primary injection data from Gemini, rather than the meter readings which were entered onto the GGSS online register. This would reduce the risk of error or fraud in compiling the report.

5.45. The creation of a new, universal and independent certification scheme was suggested by another respondent, which would track biomethane from the creation to the point of use. This would be endorsed by, but run separately from, Ofgem and other government bodies, and link with all government schemes, including the GGSS and RTFO.

Ofgem response

5.46. We agree with those respondents who suggested that we work closely with DfT to ensure compliance across both schemes. We continue to explore this to determine if data sharing can play a role in a more efficient solution. However, there are some barriers to this due to differences in how the schemes operate. These differences include the potential for different parties to claim an RTFO subsidy for the same gas; payment timeframes; units of measurement and potential issues around tracking the custody chain.

5.47. Regarding the use of GEMINI or Xoserve data, we understand that this can be a useful tool, and will add it to the indicative list of possible evidence an auditor could use

when assessing the level of interaction. However, it will not be mandatory for the completion of the audit report.

5.48. While we acknowledge that an independent certification scheme which tracks the lifecycle of biomethane would provide a good level of assurance, we are unable to implement this. There are voluntary accreditation schemes and registers which offer a similar function, and while we do not wish to officially endorse any specific ones, we understand that they are useful in collating and presenting relevant information which is pertinent to demonstrating compliance with this requirement.

Question 20

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

Summary of responses

5.49. Two respondents gave further comments. The first pointed to the proposed approach set out in the consultation which suggests that the auditor will have access to all transactions, from producer through each shipper, trader or supplier. They stated that this is not how the market currently works and this approach should be reconsidered. The biomethane producer is unlikely to be the party who claims RTFCs and the language in the guidance should be changed to reflect this. They stated that audit must focus on the interaction of the producer with their immediate counterparties, and consider if those interactions create the possibility that subsequent parties could claim against the RTFO.

5.50. This respondent also suggested that the list of possible documentation which an auditor could look at be more specific and well defined. The phrase "voluntary green-gas accreditation scheme" should not be used, and instead Ofgem should publish a definitive list of schemes which auditors could check. The guidance should also refer specifically to the RTFO Operating System (ROS) for clarity.

5.51. Another respondent stated that their submissions are already reported to Ofwat, who regulate them through price controls.

Ofgem response & final administrative approach

5.52. We believe there has been some misunderstanding of our original guidance and engagement. We understand that producers and auditors will not necessarily have access to the entire chain of custody of biomethane once it has been injected. Therefore we only expect producers to be able to provide evidence of their transactions with the first party in the chain. This is expanded on in our response to question 18.

5.53. We do not intend to publish a definitive list of acceptable schemes which can be used as evidence. This is because the accreditation in and of itself is not enough to verify the interaction. Rather, it is the documentation and information provided to the voluntary schemes which may provide the auditor with assurance as to the compliance with this requirement.

6. Audit Regime

Section summary

This section outlines how we plan on selecting and carrying out audits on applicants and participants to the GGSS.

Question

Question 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.

Question 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.

Summary of responses

6.1. Six respondents responded to this question, with all six agreeing with the proposal that all registered producers will be subject to a site audit within the first year of operation. Of these, one stated that it would be a useful exercise to ensure any issues are dealt with early on in the registration. However, they specified that audits must be processed in a timely manner and must not delay any of the first few payments.

6.2. Another respondent who supported the proposal stated that they would expect all auditors to have received additional site training. They also commented that auditors would need to be aware of the seasonality of production, and that depending on the time of year they visit, they may see the installation running at different levels of capacity.

6.3. Lastly, one respondent agreed with the proposal generally, but suggested that if a producer could show ISCC accreditation, this should satisfy the requirement for a producer to be audited.

Ofgem response & final administrative approach

6.4. We will carry out site audits on all registered producers during the first year of operation. However, we may review this approach as the scheme progresses, depending on the level of risk identified. Carrying out a site audit during the first year of operation will allow us to verify the information provided to us during registration at an early stage, and means that a consistent approach will be taken to all registrations. It will also benefit producers, as it will help identify any issues early on in their registration on the scheme. We will always seek to carry out the audit process in a timely manner and will clearly communicate the process to the participant. Payments may be affected only if we have reason to open a compliance investigation, and we will communicate this clearly with the affected participant. The audit itself will not have an effect on payments.

6.5. Following the first year of operation, additional audits may be conducted throughout the lifetime of support.

6.6. Carrying out our own audits and site inspections is a vital part of our administration of the scheme. We acknowledge that many sites will also have obtained ISCC accreditation, but ISCC accreditation is not sufficient to confirm that an installation is complying with all scheme requirements.

6.7. In response to a comment that all auditors should have received additional site training, we do ensure that our audit contractors are suitably qualified and have the necessary expertise to conduct audits of biomethane installations. Auditors will be familiar with the operation of biomethane installations and seasonal changes will be taken into account.

7. Participant Compliance

Section summary

This section covers the actions we will take as administrators if we determine that there has been any non-compliance with the GGSS requirements.

Question

Question 22: Do you have any comments on the proposed process for addressing overpayment?

Question 22

Do you have any comments on the proposed process for addressing overpayment?

Summary of responses

7.1. Of the four responses to this question, three neither agreed nor disagreed with the proposed process for dealing with overpayment. However, they suggested that Ofgem should address any overpayments within a year of the payment being made, and that the producer should be able to negotiate a re-payment plan with Ofgem.

7.2. The one remaining respondent to this question agreed with the approach set out in the consultation.

Ofgem response & final administrative approach

7.3. The GGSS regulations do not place a restriction on the period in which recovery of payments may occur. Part of our role as administrator of the scheme is to ensure that participants only receive support for which they are eligible, and this is part of our wider responsibilities to maximise value for money and protect consumers. Where we discover that overpayment has occurred, we have a duty to pursue repayment of these funds, and while we will always seek to address overpayment in a timely manner, we can only do this

once the overpayment has been discovered. Identifying that there has been overpayment may happen in a number of ways, including site audits or being informed by consultants or participants themselves, and the implications may go back several years. Given the potentially large payments we expect producers to receive, we believe that limiting our ability to recoup overpayments would be an unnecessary restriction on our ability to protect scheme funds, which are ultimately derived from bill payers. This is in line with the HM Treasury guidance on Managing Public Money⁷ (specifically annex 4.11, Overpayments).

7.4. In response to suggestions that producers should be able to negotiate a re-payment plan, it may be possible offset the amount due to us against future payments to which the participant is entitled. Where this is possible, we may seek to agree with the participant an appropriate schedule for repayment of the sum due, which may include the ability to repay the amount by instalments or through offsetting against future payments over a longer period. However, we will ultimately decide how payments must be made.

7.5. We intend to proceed with the proposed approach to overpayment that we set out in our consultation.

⁷ HM Treasury guidance on Managing Public Money, Annex 4.11 [Managing public money - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Managing_public_money_-_GOV.UK.pdf)

8. Appeals – Right of Review

Section summary

This section sets out how we propose to administer applicants’ and participants’ right to request a review of decisions we have made as administrators of the GGSS.

Question

Question 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.

Question 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.

Summary of responses

8.1. Seven out of eight respondents to this question agreed generally with the proposed administration of the right of review. Two of these respondents suggested that there should be more transparency, including detail on the timelines within which producers and Ofgem must act at different stages in the review. Another two respondents emphasised that while they agree with the process, Ofgem need to be quicker in reaching a decision on a dispute. The applicant may be at the point of securing funding or undertaking construction, which are particularly time-sensitive stages.

8.2. The one respondent who did not agree with the proposals suggested that cases should be reviewed by an independent party.

Ofgem response & final administrative approach

8.3. We appreciate the importance of receiving a timely response to reviews, particularly where the project is at a critical juncture. The reviewing officer will aim to reach a decision within 20 days of the request being made, and if it is not possible to do so within that time, they will provide the affected person with an update. However, cases vary considerably in complexity, and it may be necessary to request additional information from the affected person which can extend the time required to carry out a review. The 20-day timeframe referenced above does not include any time that we are awaiting a response to a follow-up question. We therefore recommend that those requesting a review carefully consider any information or evidence that could support their request and provide this as soon as possible in order to reduce the need for us to request additional information.

8.4. We recognise that transparency is crucial, and we plan to issue guidance which will clearly set out the steps in the process and the general timelines involved. This will also include guidance on how to submit a request and any supporting information that should be provided by the affected person.

8.5. In regard to how long a producer has to request a review, the GGSS Regulations will stipulate that any request to review should be received within 28 days of the original decision having been made.

9. Change of Registration

Section summary

This section covers our proposed approach to administering the change of registration process.

Questions

Question 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.

Question 25: Do you have any additional comments on how we will administer the change of registration process?

Question 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.

Summary of responses

9.1. Five out of eight respondents agreed with the proposal to allow new registered producers to meet the previous producer's outstanding obligations. Of those, one emphasised the importance of carrying out due diligence prior to purchase so the new owner is not surprised by any outstanding obligations attached to the site.

9.2. Of those who disagreed, two stated that the process will have a legal implication for both parties and therefore will need to be very clearly defined. One said that Ofgem will need to provide very clear guidance to assist this process, setting out what is needed at

each stage. Both the old and new registered producer will require confidence that uncertainties will not put the entire registration at risk of being revoked. These uncertainties may mean parties are reluctant to pass on key documents.

Ofgem response & final administrative approach

9.3. We recognise that the change of registration process will be part of wider, potentially complex, legal arrangements between the two parties, and acknowledge the need to clearly define the process. We will provide guidance which will set out what each party will need to provide to us, and when. This will include a list of documents that the new producer will need to provide to us in order to be registered on the scheme.

9.4. We will retain the right to carry out compliance action, including revocation of registration, even where a non-compliance occurred while the previous owner was registered. If a non-compliance is discovered that can be rectified, we will look to work with the new owner to rectify this, and any overpayments due will be apportioned according to who the original recipient was. However, where a non-compliance requires changes to be made in order to bring the installation into compliance it will be the responsibility of the new owner to implement these changes.

9.5. Where a change of registration occurs, the new owner should not consider the fact that the installation is accredited on the scheme to provide assurance that the installation is eligible and remains compliant with the requirements of the scheme.

9.6. We do not intend to provide specific guidance to new owners on what checks they need to carry out or how to carry out due diligence that satisfies them, and their investors, in line with the organisational risk appetite.

Question 25

Do you have any additional comments on how we will administer the change of registration process?

Summary of responses

9.7. Of the four respondents who provided additional comments, three expressed concerns that the Non-Domestic RHI process is too drawn out and the Change of Ownership

Form on the online register is not fit for purpose. They requested that this be improved upon in the GGSS.

9.8. They also stated that the original registered producers' email address may fall out of use as the change progresses, and Ofgem should remove the emphasis placed on using original contact details when dealing with an outgoing producer.

9.9. The three respondents also suggested that the process should permit consultants to play a larger role than on previous schemes, as they often have a better grasp on the transfer process than the producers themselves.

9.10. Lastly, one respondent re-iterated that they agreed with the proposals because it strengthens the link between the production of biomethane with the GGSS payments.

Ofgem response & final administrative approach

9.11. We acknowledge that there are concerns that the change of registration process on the NDRHI scheme was time consuming and took a long time to finalise. However, the process of changing registration is also complex and relies upon input from both parties. While we will always seek to carry out the process in a timely manner, we do not believe that any steps should be removed from the process we set out in our consultation.

9.12. Where a change of registration is requested while a compliance investigation is underway we may pause the change of ownership process while the investigation is carried out.

9.13. We note the concerns with the change of registration form on the NDRHI register. We are developing a new system for GGSS which we intend will include a new online process for change of registration, and we will take into account comments received in response to our consultation, as well as ongoing user testing.

9.14. In response to the suggestion from three respondents that consultants should be permitted a larger role in the process, we acknowledge that consultants can have additional knowledge and experience which can help participants navigate the process. However, as with other aspects of the scheme, we will require the actual submissions to be made by the owner or authorised signatory as this provides us with sufficient assurance that they are being made by individuals with the appropriate legal authority to act on behalf of the organisations involved.

10. Withdrawal from the Scheme

Section summary

This section outlines our proposals for administering a participant’s withdrawal from the GGSS.

Question

Question 26: Do you have any comments on the process for withdrawing from the scheme?

Question 26

Do you have any comments on the process for withdrawing from the scheme?

Summary of responses

10.1. We received five responses to this question. One respondent welcomed the requirement for producers to fulfil all their outstanding obligations before they withdraw. Another noted the possibility that production could have paused prior to new owners taking over, such as in the event of financial difficulties.

10.2. Three respondents suggested that Ofgem should allow for the registered producer to notify Ofgem of an intention to sell the installation but keep the registration live while a suitable buyer is found.

Ofgem response & final administrative approach

10.3. We will proceed with the proposed approach to withdrawing from the scheme.

10.4. We note that some respondents suggested that we should allow for registered producers to notify us of their intention to sell the installation but to keep the registration live while a buyer is found. Participants are welcome to inform us of their intentions, and this will not affect their registration as long as their ongoing obligations continue to be met

and they continue to meet the eligibility requirements. However, we do not intend to build this into a formal process.

11. Scheme Reporting

Section summary

This section covers our reporting requirements as GGSS administrator, and our response to the suggestions of information and data to include in our reports received in our consultation.

Question

Question 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?

Question 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?

Summary of responses

11.1. Six respondents proposed additions to the quarterly and annual GGSS reports. Two respondents suggested that we publish information on the types and volumes of different feedstocks used in biomethane production supported by the scheme. This could include types of waste to an individual feedstock level of granularity.

11.2. Two responses suggested that we publish how the actual production matches up to the expected production. They believed this would be useful to give an idea of how well the biomethane sector is doing generally. One of these respondents also requested that public reports be as light touch as possible.

11.3. One respondent requested that our reports follow the Transmission Entry Capacity register's reports, showing the number, age and capacity of registered plants, and their planned decommissioning times. They indicated that this information would be useful for a new investor making decisions in the sector.

11.4. Lastly, one respondent stated that it is essential that we report on our own operational performance; for example review times, number of installations under review,

payment timescales and the percentage of biomethane produced which receives GGSS support.

Ofgem response & final administrative approach

11.5. A number of respondents suggested that we could report on how actual production matches with expected production. While we appreciate that this could provide some useful information on the performance of the sector, we do not believe it would be appropriate to report on this. As administrator of the GGSS we have an obligation to report on key aspects of the scheme, but this does not extend to the performance of individual biomethane plants or the sector as a whole. Furthermore, as we expect a fairly low number of participants during the first year of scheme operation, publishing details of expected versus actual production could constitute commercially sensitive information for the plants registered on the scheme.

11.6. Some respondents also suggested that we could report on the types and volumes of feedstocks used in biomethane production supported by the scheme. Again, while we recognise the potential public interest in publishing this data, we consider that with a potentially small number of participants early on in the scheme this could constitute commercially sensitive information. However, we will look to increase the scope of our reporting, including feedstock information, as the scheme progresses.

11.7. Regarding the comment that we should report on our own operational performance, we already publish key performance data regarding our administration of other schemes on our website. We are likely to include the GGSS in this information in future and are looking to identify which information will be possible, and useful, to publish.

11.8. We will therefore include the information set out in our consultation in our quarterly and annual reports, but will review whether any additional information should be included as the scheme progresses.

12. Scheme Budget Shortfall

Section summary

This section addresses what we propose to do in the event of a shortfall in funds. It includes a hypothetical worked example of how an individual participant’s payments could be affected.

Question

Question 28: Do you agree or disagree with the proposed approach to managing a shortfall in scheme funding? 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.

Question 28

Do you agree or disagree with the proposed approach to managing a shortfall in scheme funding? 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.

Summary of responses

12.1. We received seven responses to this question. Three respondents expressed agreement with the proposals. One respondent who agreed generally with the proposals commented that they would like more information to understand the measures in place to mitigate the impact of shortfalls in funding.

12.2. One respondent strongly objected and raised concerns over the funding model in general, stating that their preference was for the scheme to be funded by a levy on fossil fuel producers, rather than on suppliers. The design of the funding model for the GGSS is not within our remit, and the underlying policy has already been consulted on by BEIS. However, we will pass on this comment to BEIS.

12.3. Three respondents neither agreed nor disagreed with the proposals, but raised concerns over the tariff guarantee queueing system.

Ofgem response & final administrative approach

12.4. In our consultation we set out our proposed approach to how a shortfall in scheme funding should be addressed. We stated our view that the fairest approach is to use the available funds to make payments to all participants within the usual timeframes, but for these to be reduced by the percentage of the overall shortfall while additional funds are secured. We proposed that as soon as additional funds are made available for payments, we would make an additional payment to participants to bring the payment up to the original amount they were eligible.

12.5. Since there were no alternative suggestions to this approach besides a suggested change to the funding structure, we intend to proceed with our proposals as we believe this is the fairest way to mitigate the impact of a temporary shortfall in funds.

12.6. As soon as we become aware that there are insufficient funds available to make periodic support payments due to a shortfall in the levy collection, we will work closely with BEIS resolve the shortfall as quickly as possible so that payments can be made in full. The exact approach taken will depend on the circumstances that led to the shortfall, but we will endeavour to minimise disruption to participants as far as possible.

12.7. We will also inform all participants that a shortfall has occurred and explain how we intend to address it and how payments may be affected. Rather than withholding payments until additional funds are secured, we will use the available funds to make payments to all participants within the usual timeframes, but where necessary these will to be reduced by the percentage of the overall shortfall (which may be rounded up to the nearest whole number percentage) while remaining funds are located.

12.8. All payments will be reduced by the same amount. For example, if there is a shortfall of 2%, we would reduce the periodic support payments due to each registered producer by 2%.

12.9. As soon as additional funds are made available to make up the shortfall, we will make an additional payment to all participants to bring the payment up to the original amount they were eligible for.

Worked example

At the end of Q1 2023 it becomes clear to Ofgem that there is a shortfall in scheme funding due to a combination of factors including several suppliers exiting the market.

The overall shortfall in the levy is £1.5 million, which translates to a **4.5% shortfall** in the scheme budget available for making periodic support payments.

Installation A has submitted meter readings and periodic data for Q1 2023 and is eligible for a periodic support payment of £650,000 for that quarter.

Ofgem contacts all scheme participants to inform them that there is a shortfall of 4.5% in the scheme budget due to exits from the market, meaning that all periodic support payments will be reduced by that amount.

For installation A, this means that their periodic support payment for Q1 will be reduced by 4.5%

$$£650,000 \times 0.955 = £620,750$$

Installation A receive a payment of £620,750, which was the original amount they were eligible for, reduced by 4.5%.

All other installations will have their payments reduced by the same *percentage* (4.5%).

Once we have secured additional funding to make up the shortfall, we will make an additional payment to each participant for the amount that their original payment was reduced by (rather than adding to the following payment).

Installation A will therefore receive an additional payment of £29,250

12.10. We acknowledge that it is important for registered producers to have as much information as possible about what will happen in the unlikely event that a shortfall occurs, so we will also issue detailed guidance setting out the steps we will take and the expected impact on producers.

12.11. We also received three comments on the queuing system for tariff guarantees. We do not believe that these are relevant to this question, and have addressed these comments in our response to question 2.

Appendix 1. List of respondents

1. Air Liquide Advanced Business & Technologies UK Ltd
2. Anaerobic Digestion and Bioresources Association (ABDA)
3. Barrow Shipping Ltd
4. British Sugar plc
5. Ceres Energy Ltd
6. CNG Services Ltd
7. Energy Network Association
8. Grosvenor Farms Limited
9. Renewable Energy Assurance Limited (administrators of the Green Gas Certification Scheme)
10. The Association for Renewable Energy and Clean Technology (REA)
11. Thames Water

Four responses are being retained to protect confidentiality.