

Renewables Obligation (RO)

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Renewables Obligation: Guidance for agents

Overview

This document provides guidance for agents, or prospective agents, wishing to act on behalf of operators of renewable microgenerators (generating stations with a declared net capacity of 50kW or less) under the Renewables Obligation. This document is an updated version of the guidance published in May 2013.

This is intended to be a working document and may be updated from time to time. It is not intended to be a definitive legal guide to the Renewables Obligation. On 1 April 2017, the RO closed to new capacity.

Associated Documents

Readers should be aware of the following documents which support this publication:

Legislation

All legislation can be found at www.legislation.gov.uk:

- The Renewables Obligation Order 2015
- The Renewables Obligation (Scotland) Order 2009
- The Renewables Obligation Order (Northern Ireland) 2009
- Their respective amendment Orders for 2010, 2011, 2013, 2014, 2015, 2016, 2021
- The RO Closure Orders

Guidance

All documents are available at www.ofgem.gov.uk/ro.

- [Renewables Obligation: Banked ROCs FAQ](#)
- [Renewables Obligation: Essential guide to commissioning](#)
- [Renewables Obligation: Fuel Measurement and Sampling \(FMS\)](#)
- [Renewables Obligation: Sustainability Criteria](#)
- [Renewables Obligation: Sustainability Reporting Guidance](#)
- [Renewables Obligation: Biodiesel and Fossil Derived Bioliquids Guidance](#)
- [Northern Ireland Renewables Obligation: FAQ - Microgenerators](#)

For closure guidance go to www.ofgem.gov.uk/ro-closure:

- [Renewables Obligation: Closure of the scheme in England, Scotland and Wales](#)
- [Northern Ireland Renewables Obligation: Closure of the scheme](#)
- [Renewables Obligation: Closure of the scheme to small-scale solar PV](#)
- [Renewables Obligation: Closure of the scheme to onshore wind in England, Scotland and Wales](#)
- [Northern Ireland Renewables Obligation: Closure of the scheme to small-scale onshore wind](#)
- [Renewables Obligation: Solar PV and Wind Grace Periods Summary](#)

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Executive summary

This document provides guidance for agents appointed to represent or wishing to be appointed to represent operators of microgenerators under the Renewables Obligation Orders (referred to as the Orders¹). It summarises:

- the function of an agent under the Order,
- the circumstances under which an agent may be appointed to act on behalf of the operator of a generating station,
- the information we may require from both an agent and operator of a generating station to enable us carry out our function under the Orders and how we issue Renewables Obligation Certificates (ROCs) to agents.

Under the Order, an operator of a generating station with a declared net capacity (DNC) of 50kW or less (ie, a microgenerator) may appoint an agent to act on their behalf. If ROCs are to be issued to a party other than the operator of a generating station, an agent must be appointed by that operator. An appointed agent may only be issued with ROCs in respect of electricity generated by stations that have a DNC of 50kW or less. If agents are to be issued with ROCs in respect of electricity generated by different stations using different renewable sources, those ROCs must be grouped according to the same technology type.

This document does not purport to anticipate every scenario which may arise. Where a scenario arises which is not addressed in these procedures, we will adopt an approach consistent with the relevant legislation. Any separate guidance published in addition to this document will be posted on our website¹.

This is a guidance document only. At all times, the onus is on the operator of a generating station or their agent to ensure that they are aware of the requirements of the Orders. This document is not intended to provide legal advice on how the Orders should be interpreted. We will provide guidance on the eligibility of technologies where we can. However, if a technology is new, developers might find it helpful to seek their own legal and technical advice before approaching Ofgem. It is intended to be a working document and may be updated from time to time. In instances where third parties are involved in the RO, for example data collectors for the provision

¹ <https://www.ofgem.gov.uk/environmental-and-social-schemes/renewables-obligation-ro/contacts-publications-and-data/publications-library-renewables-obligation-ro>

of providing monthly information, the operator of the generating station or their agent is responsible for ensuring any guidance is distributed accordingly.

1. Introduction to the RO

The Scheme

- 1.1. The Renewables Obligation (RO), the Renewables Obligation (Scotland) (RO(S)) and the Northern Ireland Renewables Obligation (NIRO) schemes were designed to incentivise renewable electricity generation in the UK. The Orders (the Renewables Obligation Order 2015 (ROO 2015), the Renewables Obligation (Scotland) Order 2009 (RO(S) 2009) and the Renewables Obligation Order (Northern Ireland) 2009 (NIRO Order 2009) – the legislation underpinning the RO, RO(S) and NIRO place an obligation on licensed electricity suppliers in England, Wales, Scotland and Northern Ireland to present a specified number of Renewables Obligation Certificates (ROCs) per megawatt hour of electricity supplied to their customers during each obligation period.
- 1.2. The Department for Business, Energy and Industrial Strategy (BEIS), the Scottish Government and the Department for the Economy in Northern Ireland (DfE) are responsible for developing the policy underpinning the RO schemes, including setting support levels, establishing the legislative framework and making amendments to the legislation.
- 1.3. The schemes are administered by the Gas and Electricity Markets Authority (the Authority), whose day to day functions are performed by Ofgem. The RO and RO(S) Orders detail the Authority's functions in respect of the RO in England and Wales and in Scotland, respectively. A number of these functions are carried out via our IT system - the Renewable Electricity Register (the RER) and include:
 - issuing ROCs and Scottish Renewables Obligation Certificates (SROCs),
 - establishing and maintaining a register of ROCs and SROCs,
 - revoking ROCs and SROCs where necessary,
 - monitoring compliance with the requirements of the Orders,
 - calculating annually the buy-out price resulting from the adjustments made to reflect changes in the RPI,
 - receiving buy-out payments and redistributing the buy-out fund,
 - receiving late payments and redistributing the late payment fund,
 - recovering the administration costs of the RO from the buy-out fund,

- publishing an annual report on the operation of and compliance with the requirements of the Orders.

- 1.4. We administer the Northern Ireland Renewables Obligation (NIRO) in accordance with the NIRO Order on behalf of the Northern Ireland Utility Regulator(UR) under an Agency Services Agreement. Under this agreement, the Authority is required to carry out the functions listed above in respect of the NIRO. However, the UR continues to retain responsibility under the legislation for administering the NIRO.
- 1.5. We carry out the functions as efficiently and effectively as possible according to the provisions of the Orders. We cannot act beyond the scope of the powers laid down in the Orders. For example, we have no remit over the operation or regulation of the ROC market itself. Amendments to the relevant legislation in respect of the RO are a matter for the Secretary of State, Scottish Ministers and the Secretary of State for Northern Ireland.

The closure of the RO

- 1.6. The RO closed to new capacity on 31 March 2017, as set out in the RO Closure Order 2014. Support for capacity accredited under the RO at that date is retained at existing support levels (a policy called grandfathering of support) and receives its full lifetime of support. Some grace periods were available to those who missed the closure date in certain circumstances. As ROCs cannot be issued on generation after March 2037, capacity with an effective date of accreditation after 31 March 2017 will not receive 20 years of support.
- 1.7. Between 31 March 2015 and 31 March 2017, the RO closed early to solar PV in England, Scotland and Wales and onshore wind in all countries. A summary of the early closures and grace periods can be found in our Renewables Obligation: Solar PV and Wind Grace Periods Summary².
- 1.8. The government introduced the Contracts for Difference (CfD) scheme in 2014. In the transition period, when both schemes were open, operators were able to choose between the schemes. Ofgem continues to administer the RO, and National Grid (and the Low Carbon Contracts Company) administers the CfD scheme. The choice of scheme applied to stations in England, Scotland and Wales only.

² See the Associated Documents section

- 1.9. For further information on the transition period and the interaction of the RO and CfDs please refer to Appendix 5 of the Guidance for generators.

This Document

- 1.10. The Orders³ allow an operator to appoint an agent for the purpose of receiving certificates on their behalf. This guidance document is for agents or prospective agents appointed to act on behalf of renewables microgenerators (generating stations with a declared net capacity of 50kW or less) under the Northern Ireland Renewables Obligation scheme. It is not intended to be a definitive technical or legal guide to the Renewables Obligation. Therefore agents should seek their own technical and legal advice as appropriate.
- 1.11. This guidance does not anticipate every scenario which may arise. If a scenario arises which is not addressed in this guidance, we will adopt an approach consistent with the relevant legislation. Any guidance in addition to this document will be published on our website: www.ofgem.gov.uk/ro.
- 1.12. Unless apparent from the context, where "RO" is used, it denotes the Renewables Obligation (RO) Order, the Renewables Obligation (Scotland) (RO(S)) Order and the Northern Ireland Renewables Obligation (NIRO) Order and where "ROC" is used it denotes certificates issued under all three Orders ie, ROCs, SROCs and NIROCs.
- 1.13. 'Ofgem', 'us', 'our' and 'we' are used interchangeably when referring to the exercise of the Authority's powers and functions under the Orders.
- 1.14. The term "the Act" refers to the Electricity Act 1989 (as amended). This is the primary legislation that the RO and RO(S) Orders came from. Changes made to the Act via the Energy Act 2008 have given the government powers to change the ROC support structure.
- 1.15. The Department of Enterprise, Trade and Investment (DETI) introduced the NIRO scheme in exercise of the powers conferred by the Energy (Northern Ireland) Order 2003⁴.
- 1.16. The terms 'generators' and 'operators' are used interchangeably throughout the document.

³ Articles 19(2) of the ROO 2015(as amended), 35(2)of the RO(S) 2009(as amended) and 33(2) of the NIRO(as amended).

⁴ Articles 52 to 55F and 66(3) of The Energy (Northern Ireland) Order 2003 gave DETI (now DfE) the powers to adopt similar legislation from GB in order to avail of the NIRO scheme.

Queries

- 1.17. Any queries concerning our functions under the Orders or a station that is accredited or pending accreditation under the scheme should be emailed to our dedicated support team on Renewable.Enquiry@ofgem.gov.uk. The nature of the query and the station name should be clearly marked in the title of the email.
- 1.18. Written queries should be forwarded to Renewable Electricity Administration, Ofgem, Commonwealth house, 32 Albion St, Glasgow.
- 1.19. For telephone enquiries, the administration team can be contacted on 020 7901 7310 during office hours. When calling this number, callers should select option two. Please note that we can only provide guidance on the legislation currently in place. Any queries regarding future changes to the Orders or wider renewable policy should be directed to BEIS, the Scottish Government or DfE as appropriate. Contact details can be found at <http://www.gov.uk/beis>, www.scotland.gov.uk and www.economy-ni.gov.uk, respectively.

The Feed-in Tariffs (FIT)

- 1.20. The FIT scheme was introduced in April 2010 in Great Britain and closed from 1 April 2019 to operators of renewable electricity installations with maximum capacity of 5MW Total Installed Capacity (TIC). To negate the chance of double-counting and to ensure that operators of generating stations received appropriate subsidy, changes were made in the 2010 RO and RO(S) Orders to mirror the provisions for FIT.
- 1.21. From 1 April 2010 onwards, agents were not able to act under the RO and RO(S) Orders for microgenerators who operated hydroelectric, PV, wind or AD (Anaerobic Digestion) generating stations. This was due to the fact that ROCs and SROCs could not be issued on electricity generated by such technologies on or after 1 April 2010. Agents acting under the NIRO Order could continue as before as a FIT scheme was not introduced in Northern Ireland in April 2010. The 2010 NIRO Order was amended to provide for enhanced levels of NIROC subsidy for certain generating stations that gained NIRO accreditation after 31 March 2010.
- 1.22. It is important to note that, for the purposes of the RO and RO(S), agents can still represent operators of generating stations that use renewable sources of energy that are not covered by the FIT scheme, such as non-AD biomass.

2. Functions of an agent

Chapter Summary

Under the Orders, an agent may be appointed to act on behalf of the operator of a generating station with a DNC of 50kW or less. In this chapter we provide guidance on the circumstances where an agent may be appointed, the responsibilities of an agent with respect to the generating station that they represent and the process of registering an agent account. Please note that the RO schemes are now closed to both new accreditation applications as well as applications to add capacity to already accredited stations.

Acting as an agent on behalf of the operator of a generating station

- 2.1. Under the Orders, the operator of a generating station with a DNC of 50kW or less may appoint an agent to act on their behalf. If ROCs are to be issued to a party other than the operator of a generating station, an agent must be appointed by that operator. An appointed agent may only be issued with ROCs in respect of electricity generated by stations that have a DNC of 50kW or less. If agents are to be issued with ROCs in respect of electricity generated by different stations using different renewable sources, those ROCs must be grouped according to the same technology type. These are referred to as generator groups.
- 2.2. An agent appointed for this purpose must confirm in each obligation period to Ofgem that:
 - each generating station to which a ROC is to be issued is a microgenerator, and
 - the generating station in any group is accredited as a generating station capable of generating electricity in the same way from the same renewable source.
- 2.3 An agent, once appointed to act on behalf of an operator of a generating station, carries out all the functions of the operator for the purpose of receiving ROCs. In this capacity, an agent can seek accreditation, sign declarations, submit amalgamated output data and receive ROCs on behalf of the operator of the generating station.
- 2.4 The Orders provide that where an agent is to be appointed:
 - Ofgem must be notified in writing of the agent's name and address.
 - That notification may be provided to the Authority by the operator or the agent.
 - Ofgem must be notified in writing if the agent's appointment is terminated.

- That notification may be provided to the Authority by the operator or the agent.
- 2.5 In order to act as the agent of a generating station, we require notification from the operator of the generating station that an agent has been appointed to act on its behalf. This is done using an agent appointment form, a copy of this form which can be found on our website⁵. This appointment form can be submitted either directly from the operator or from the agent.
- 2.6 Where agents are appointed in this capacity, this arrangement should not normally be terminated until the end of the obligation period. Please see Chapter 6 for further information on contract termination.
- 2.7 Once an agent has been appointed by the operator of a generating station, all correspondence to and from Ofgem will be via that agent, and the agent will be regarded as the sole point of contact for the generating station.
- 2.8 Once each generating station has been accredited, the agent can claim ROCs on behalf of the generating station by submitting output data to us. Please refer to chapter 5 for further information on data submission.

Responsibilities of an agent

- 2.9. Responsibilities of an agent may include:
- obtaining accreditation on behalf of the operator of the generating station,
 - acting as the main point of contact,
 - raising any complaints on behalf of the operator⁶,
 - dealing with queries relating to any applications for accreditation,
 - making and submitting declarations on behalf of the generating stations it represents,
 - requesting and collating renewable output data for the generating stations it represents,

⁵ <https://www.ofgem.gov.uk/publications/agent-appointment-form>

⁶ Further information on our complaint procedures can be found at: <https://www.ofgem.gov.uk/about-us/contact-us/complaining-about-ofgem>

- submitting amalgamated output data to us within the agreed timetable,
- providing information in whatever form the Authority requires within relevant timeframes,
- maintaining a record of all relevant information for audit purposes, and
- acting as the registered holder of its ROC account.

Registering an agent account

2.10 In order to become an agent, an interested party will need to open an 'agent account' on the RER. This is an integrated website enabling all the functions of the RO schemes that Ofgem administers on behalf of the government.

Providing administrative support

2.11 Any operator may seek administrative support from third parties if they wish. However, these third parties are not considered agents unless appointed under the provisions set out in the Orders.

2.12 Where the operator of the generating station decides to seek support from a third party but does not wish to appoint an agent or is not eligible to appoint an agent the operator will need to establish an operator account on the RER. They will then need to give a representative of the third party access rights allowing them to use their account for the purposes they have agreed with the third party. However, the operator of the generating station remains accountable for any information provided on the RER by their third party as the superuser.

2.13 Where applicable, a third party providing administrative support may complete the online application on behalf of the operator of the generating station. However, the superuser will still need to make the necessary declarations on application and the declarations required on an annual basis if ROCs are to be issued. Written confirmation of accreditation will be sent to the operator of the generating station.

2.14 When the operator has notified us of a generating station that it has appointed a contact to provide administrative support, we can consider that person as a contact for the generating station. This will include the provision of information in relation to the accreditation of the generating station and the provision of information for the purposes of claiming ROCs. However, ROCs can only be issued to the operator of the generating station, ie, the superuser of the operator account.

2.15 Similarly, notification of any guidance in relation to the RO published by Ofgem will be issued to the operator of the generating station, given that it will be the registered account holder on the RER. It will be the operator's responsibility to inform any individuals providing administrative support of any guidance issued.

3. Accreditation of generating stations

Chapter Summary

Here we provide information on the accreditation of generating stations. This should be read in conjunction with our Renewables Obligation: Guidance for generators. Please note that the RO schemes are now closed to both new accreditation applications as well as applications to add capacity to already accredited stations.

- 3.1 Operators of generating stations that wanted to receive ROCs must have been accredited by us as a generating station capable of generating electricity from eligible renewable sources. For further information on the eligibility requirements of the scheme, please refer to Appendix 3 of our Renewables Obligation: Guidance for generators.
- 3.2 Each generating station accredited under the scheme should have received an accreditation confirmation letter that states the relevant accreditation code and the date on which the accreditation is effective from. The letter also confirmed any conditions attached to the accreditation. When a generating station in an agent's generator group has been granted accreditation, as with any accreditation, a unique RO accreditation code was allocated to it. However, ROCs will not be issued under this accreditation number. Please refer to Appendix 1 for further information.

Provision of information to the Authority

- 3.3 The Orders provide that Ofgem may require:
 - a designated electricity supplier to provide it with information which, in its opinion, is relevant to the question of whether the supplier is discharging, or has discharged, its renewables obligation.
 - a person to provide it with information, which in its opinion is relevant to the question whether a ROC is, or was or will in future be, required to be issued to the person.
- 3.4 Under this provision we may also require any person who:
 - is the operator of a generating station generating electricity in respect of which a ROC has been or may be issued, or their agent;
 - supplies, distributes or transmits such electricity; or
 - buys or sells (as a trader) such electricity or ROCs

to provide us with information we believe we require in order to carry out any of our functions under the RO. Information requested must be given to Ofgem by the date specified and in whatever form it is required by Ofgem⁷.

- 3.5 We issue ROCs to agents based on output data submitted. It is essential for us to be certain that the information provided is accurate. If this is not the case, then we will not issue ROCs and/or revoke ROCs if they should not have been issued.
- 3.6 If a ROC should not have been issued in the first instance, we may revoke it. If the ROCs in question cannot be revoked ie, they have already been redeemed, the Orders make provision for us to withhold ROCs from the future generation by the station in question.
- 3.7 We carry out a number of checks to ensure that the data submitted is accurate. In addition, we require agents to submit an "agent - Information" declaration on an annual basis, declaring that:
- any information and/or calculations submitted to the Authority, including any information which is provided in order to determine the amount of electricity generated from eligible renewable resources, will be complete and accurate, and
 - they will not knowingly or recklessly submit information which is false and they are aware that doing so could result in revocation of all ROCs issued.

Maintaining accreditation

- 3.8 Once appointed, an agent takes on the role as the primary person in charge of the generating station, ie, they are the sole person Ofgem will liaise with, and they will take on all the responsibilities of the operator. After control of the station has been passed over to an agent, they must then ensure that they supply accurate information as required by Ofgem. It is their responsibility to complete and submit declarations. The information that should be supplied by the agent includes⁸:
- changes made to the station, such as what equipment/ infrastructure was removed and what remains in place. We will establish whether it still constitutes a generating station using this information,

⁷ Article 78 to 80 of the ROO 2015, Article 53 of the RO(S) Order 2009 or Article 45 of the NIRO Order 2009 gave us the powers to request information.

⁸ Further details on the information agents are required to provide Ofgem in order to maintain accreditation can be found in Chapter 2 of the RO Guidance for generators.

- evidence of any of the changes stated, such as decommissioning certificates, photographic evidence and other similar documents,
- a timeline of events and photo evidence of these events, such as the station in its commissioned state and once it has been decommissioned,
- invoices or receipts for any of the particular processes, confirming such things as equipment hire/ labour costs/ transport costs/ disposal costs etc.

Declarations

- 3.9 In order to claim ROCs on behalf of one or more microgenerators and maintain their accreditation, the agent must submit declarations annually. Declarations should be submitted on behalf of each generating station in a generator group. These declarations are made online via the RER and must be agreed upon by the agent.
- 3.10 We require the 'superuser' to either be a director, a company secretary, the chief operating officer, or to provide evidence of suitable permission that they can act in this role.
- 3.11 If an agent represents more than one accredited generating station in a generator group, one declaration must be submitted by the agent for each generating station.
- 3.12 The agent will need to ensure that it has the necessary knowledge to sign the declaration on behalf of the operator. It will need to seek information and/or assurances from each operator to do this. For example, it will need to be satisfied whether electricity is being used in a permitted way. To ensure a complete audit trail exists, the agent will need to obtain this information in writing from the operator.
- 3.13 Agents will have different registration numbers, or different generator groups, representing generating stations accredited under the same Order and using the same technology and with the same frequency of data submission.
- 3.14 Every generating station in a generator group needs to be represented by a declaration.
- 3.15 Generator groups containing generating stations on an annual issue of ROCs should have their declarations submitted before the end of the obligation period in order to capture all the accreditations during that period. Such declarations should be made via the RER by 31 March each year. This will cover the obligation period, 1 April - 31 March, in which it is submitted and to which it relates. For example, declarations covering the 2021/22 obligation period should be submitted by 31 March 2021.

Requirements for the supply of electricity

- 3.16 Under the RO, in addition to the eligibility requirements linked to the generating station itself, there are also requirements in terms of the use and supply of electricity on which ROCs can be issued. The Orders set out that ROCs can only be issued on electricity supplied to customers in the GB and NI for electricity used in a permitted way. This can include electricity exported to the 'grid' and supplied by a licensed supplier to customers in the GB and NI, electricity used on-site by the operator of the generating station and electricity supplied to a third party via a private wire.
- 3.17 On an annual basis, agents are required to sign relevant declarations regarding the supply of electricity on which ROCs are to be issued on behalf of the operators that they represent: the 'agent - export only' or the 'agent - permitted ways' declaration. Depending on the circumstances, they may also be required to provide evidence of appropriate contractual arrangements and other information that demonstrates that the electricity is supplied to customers in the UK.
- 3.18 The declarations that need to be signed will depend on the manner in which the electricity is used or supplied. Agents should read all the declarations carefully in advance of making them and satisfy themselves that those provisions apply.
- 3.19 Appendix 3 of Ofgem's Renewables Obligation: Guidance for generators provides further information on the declarations and provides details of the evidence that may be required to demonstrate supply to customers in GB and NI and the circumstances under which it may be required.

4. Audit and Compliance

Chapter Summary

Here we provide information about agent audits and compliance. This information includes detail on why agents are audited, the process by which audits are carried out, what is reviewed during agent audits, and what happens after the audit is completed. It also covers information in relation to compliance investigations and the relationship between audit and compliance investigations.

Agent audits process

- 4.1 We carry out a programme of audits of agents on an annual basis. The audits are conducted to provide assurance to Ofgem that agents have the necessary processes and controls in place to carry out their functions as an agent in line with the Orders and this guidance.
- 4.2 Audits are carried out by an external contractor on Ofgem's behalf. This usually involves a visit to the organisation's premises. Checks made by the auditor include, but are not limited to verification of an agent's appointment and termination procedures, how communications between the agent and the operator are recorded, the declarations process and accuracy of those declarations and of the output data, and outstanding complaints or enquires raised by Ofgem. The auditors will make contact with the agent to arrange the site visit, which should take place within three weeks of receipt of the audit notification letter.
- 4.3 Auditors review, amongst other things, the data that is submitted for ROC claims. Given this, agents should keep and maintain a full audit trail of documentation for each generating station that they represent, to be provided at the time of audit.
- 4.4 Agents should provide the auditors with all information requested during the audit process within the timescales provided. Any information that remains outstanding will be listed in the audit report and could affect the assurance rating of the audit. A failure to provide information to the auditors could also lead to compliance action, including the refusal to issue ROCs to the generating station until such time the information has been provided.

Audit report and findings

- 4.5 Following a site visit, the auditor will write up a report detailing what was assessed during the audit, along with any findings to be addressed and outstanding information to be provided by the agent.
- 4.6 The steps involved in the audit procedure are as follows:
- audit pack collation,
 - site visit,
 - draft report being submitted to Ofgem,
 - draft report being reviewed and then finalised by the auditor,
 - final audit report being sent to the agent to action.
- 4.7 The full process above usually takes approximately three months to complete, but it can take longer due to complexities or changes needed to the report.
- 4.8 Once the audit report is finalised, Ofgem will aim to write to the agent concerned within 2-3 weeks, outlining any findings and including a copy of the auditor's report. The agent is expected to address these findings and respond back to us providing all of the relevant evidence to resolve the issues that have been highlighted.
- 4.9 Where non-compliances have been identified during the audit the Participant Compliance team will lead on investigating these issues and any outstanding matters highlighted in the report.
- 4.10 Delays in resolving audit findings can occur when agents do not provide comprehensive responses and, where relevant, third-party supporting evidence. To avoid any delays, agents should aim to provide a full response with all third-party supporting evidence by the response deadline set out within the audit findings letter.
- 4.11 We encourage agents to engage with our auditors and with us as early as possible if there are any issues with presenting the information to Ofgem for consideration. Agents should not wait until the deadline set by Ofgem to initiate requests for extensions.
- 4.12 During the audit, there may be circumstances where we may request additional information and supporting documentation.

4.13 This chapter provides guidance on the agent audit process. For further information on microgenerator audits please refer to Chapter 3 of the Guidance for generators.

5. Data submissions and supporting evidence

NOTE: This chapter contains information regarding the data submission for agents on the Renewables and Combined Heat and Power (R&CHP) Register. At the time that the most recent version of this document was published, this information was still in use. However, it is expected that by the time the final version of this document is published, the R&CHP Register would have been replaced by the Renewable Electricity Register (RER), and that the process by which agents will submit data on the RER will have been changed. This document will be amended as soon as the functionality is ready and the process has been finalised.

Chapter Summary

Here we explain how to submit amalgamated output data and the supporting evidence that we may require to determine whether ROCs should be issued. It also provides the timetable for submission of information, how we deal with situations when information is provided outside of the timetable and how we deal with errors in the data.

Introduction

5.1 The Orders set out the way in which the net renewable output is to be calculated for the purposes of issuing ROCs. This is as follows:

Net Renewable Output = (Gross Output – Input Electricity) x Renewable Qualifying Percentage

5.2 In order for Ofgem to issue ROCs to an accredited generating station, the operator must provide us with accurate and reliable output and input electricity data. For stations using fuels we may also require information such as the fuels' calorific value (as agreed as part of the station's Fuel Measurement and Sampling (FMS) procedures) to determine the qualifying renewable fraction of the fuels used.

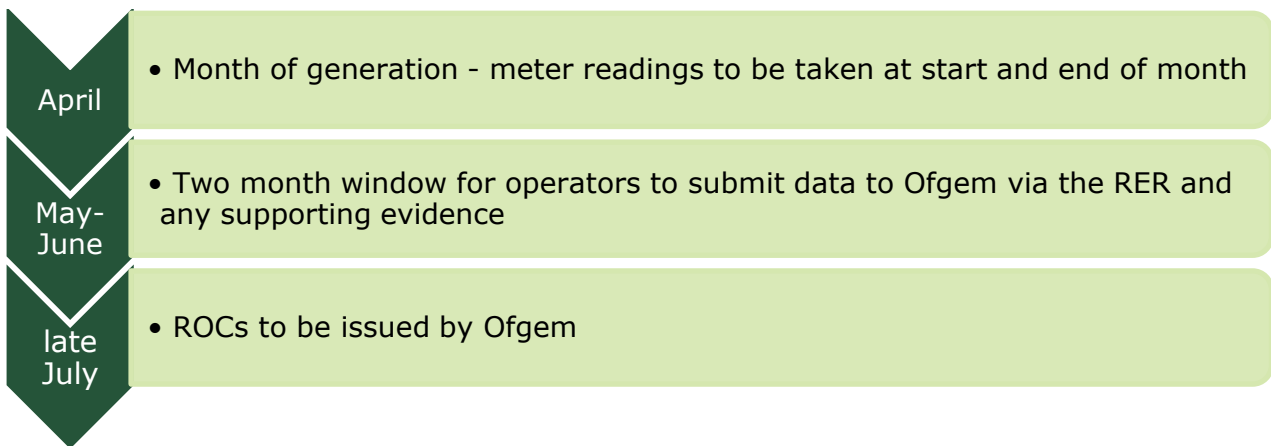
5.3 Output data is submitted through the operator's (or agent's) account on the RER. Any supporting evidence required should be sent to microNIRO@ofgem.gov.uk uploaded alongside the data submission using the Attach Documents functionality.

Responsibility for data submissions and timelines for data submission

5.4 It is the agent's responsibility to ensure that Ofgem has received the relevant information for their ROC claim within the set legislative deadlines.

5.5 Operators and agents have to submit their data to Ofgem two months after the last month of generation. This following flow diagram(Figure 1) provides an example of this timeline:

Figure 1: Timeline of data submission to Ofgem by agents



5.6 In the case of annual submissions, this two month submission period also applies. Data for annual submissions (1 April – 31 March) should be received by 31 May.

5.7 The timelines for data submission and certificate issue are published annually by Ofgem. The latest ROC issue schedule can be found on our website at www.ofgem.gov.uk/ro.

5.8 If an agent knows in advance of the deadline as to a reason why they will not be able to submit data, they should contact us to discuss these reasons before the submission deadline.

5.9 Where there is any doubt about whether we have received this data, we will require evidence from the agent that the required information was sent before the deadline. Therefore, agents must retain a written record of any issues they encounter when submitting data to us.

Monthly and annual issue

5.10 As part of the initial accreditation application, microgenerators or their agent can opt to claim ROCs on a monthly or annual basis, and so the provision of output data to Ofgem will relate to the chosen period.

- Monthly data – this relates to a calendar month.
- Annual data – this relates to an obligation period (1 April – 31 March).

Submission of amalgamated data

- 5.11 Where two or more eligible generating stations with a declared net capacity of 50kW or less generate electricity from the same renewable source, the operators of these stations can appoint an agent to represent them for the purposes of the RO scheme. An appointed agent will be able to, amongst other tasks, submit output data to us for the stations they represent and receive ROCs based upon the amalgamated output of each group of stations that use the same renewable source.
- 5.12 We have a standard spreadsheet-based template that can be used for submitting output data. The template are made available to agents at the end of the obligation period each year. It is imperative that the agent ensures that all of the stations that they represent, that have been awarded accreditation, are listed in the spreadsheet. If an agent believes any stations are missing from the template provided or any other discrepancies, they should contact us at microNIRO@ofgem.gov.uk as soon as possible.
- 5.13 Once the spreadsheet has been completed, with output data for each station, it should be submitted via the RER within the two-month statutory deadline.
- 5.14 The agent must also put in place appropriate arrangements for ensuring that the data it submits to Ofgem is accurate. It is an agent's responsibility to check the data submitted by each operator that it represents and establish robust procedures to ensure accuracy in data entry. At a minimum, the following checks should be carried out on the output data prior to submission to Ofgem:
- check that the start meter reading match the end meter reading from the previous year's submission,
 - check that the end meter reading minus the start meter reading equals output, and
 - check that the output for that year is feasible for the technology and capacity at the generating station.

Completing the spreadsheet

- 5.15 The template must include the generation data for each individual station that the agent represents, including start and end non-half hourly meter readings and any input electricity used by any generating stations in a month or year.

5.16 The template contains 18 columns, all of which need to be completed by the agent. This should be a straight forward process, however to provide absolute clarity, we have listed each column below and provided an explanation of what is required to populate it.

Output_kWh

5.17 This cell should contain the total eligible generation of the generating station.

Import_kWh, Standby_Generation_kWh, and Generated_By_Station_KWh

5.18 In the majority of cases, these three cells will contain a "0"; however, in some situations, a generating station may have used some form of import or standby generation to support its auxiliary equipment. Where this is the case, please complete the appropriate cells with the necessary amount of "input electricity" for the appropriate period. This may only apply in a few circumstances, if at all.

Estimates

5.19 Where the annual submission is based on actual meter readings, this column should be answered 'No'. If the submission is based on an estimate, this should be answered 'Yes'.

REGO Declaration Acceptance

5.20 Some agents may also have applied and been accredited under the Renewable Energy Guarantees of Origin (REGO) scheme⁹. If this is the case, select "Yes" from the drop-down menu as the REGO declaration will need to be confirmed. Please also complete the REGO declaration form (which will be sent with the template) for the relevant generating stations and submit it with the spreadsheet once it is completed. We will not issue REGOs on those stations who have not been accredited under the scheme or if the agent appointment form does not highlight that the operator wishes you to act on their behalf for the purposes of this legislation.

Comments

5.21 Agents might use this section to provide us with additional information in order to pre-empt any queries we might have. For initial submissions this could be: details of meter changes, particular claim notifications or low generation explanation. For any subsequent submission agents should use the comments section to respond to our previous queries.

⁹ <https://www.ofgem.gov.uk/environmental-and-social-schemes/renewable-energy-guarantees-origin-rego>

5.22 If, however, there are no comments to make, the agent might simply leave this cell blank.

Meter Reading Start Date

5.23 This cell should contain the start of the obligation period.

5.24 This cell should contain the date representing the end meter reading, and this should be taken by the end of May following the relevant obligation period. For example, end meter readings for the 2021/22 period should have been taken by 31 May 2022 at the latest.

Start Meter Reading, End Meter Reading

5.25 The Start Meter Reading should contain the meter reading taken on the start date described above. The End Meter Reading should contain the meter reading taken on the end date described above. Most domestic total generation meters should have a multiplier of 1, which has been auto-filled, but should it be any different, please amend this cell as appropriate.

Amount Measured kWh

5.26 This cell should equal the difference in the two meter readings and should therefore be the same as the "Output_kWh" cell (assuming no "input electricity" has been used at the generating station).

Source of Figures

5.27 In the majority of cases, the source of the figures will be a "manual reading" by the operator themselves. However, please select any other source from the drop-down menu if applicable. If estimates are used, we will require further information as described above.

Amalgamation

5.28 Agents who represent one or more generating stations will be allocated unique registration numbers. Appendix 1 of this document explains how agent registration numbers are produced and what they mean. These numbers are unique to each agent and are needed to indicate what each generator group represents. Agent registration numbers are used to issue ROCs to each group and make up part of the ROC identifier. ROCs are issued to an agent based on the amalgamated generation output data of each generator group.

5.29 ROCs will be issued for amalgamated output data where each generating station in the group:

- has a DNC of 50kW or less,
- has the same generation type (as described in Appendix 1),
- is accredited under the same Order and
- is claiming ROCs for the same period (monthly or annually).

Rounding

5.30 Output data is rounded to the nearest whole ROC. For example:

- if a generator group generates between 0.75MWh but less than 1.25MWh of electricity from an eligible renewable source in a month or obligation period, it will be issued with 2 ROCs,
- if a generating station group generates 1.25MWh of electricity from an eligible renewable source in a month or obligation period, it will be issued 3 ROCs.
- the number of NIROCs issued will vary for microgenerating stations in Northern Ireland according to their technology and accreditation date. Enhanced levels of support were introduced in 2010 for generating stations with an accreditation date after 31 March 2010. The support levels were amended in 2013 in light of the banding review. For further information on ROC banding please refer to Appendix 4, Tables A4.1 and A4.2 of the Guidance for generators.

5.31 Generating stations that reduce their capacity after 31 March 2009 so that their declared net capacity is less than 50kW do not meet the definition of a microgenerator. In this situation, the station will receive a number of ROCs per MWh determined by the grandfathering and banding rules set out in the Orders.

5.32 Individual data submissions for the same generator group are amalgamated first and then rounded. Table 5.1 below provides an example of how data would be amalgamated and rounded.

Table 5.1: Example of amalgamation and rounding

Station name	Technology	Order	Submission type	Total generation (MWh)
Station A	Onshore Wind	NIRO	Annual	1.0
Station B	Onshore Wind	NIRO	Annual	1.25
Station C	Onshore Wind	NIRO	Annual	2.25
Station D	Onshore Wind	NIRO	Annual	0.3
Amalgamation generation total				4.8
Total NIROC claim				20

5.33 The Orders do not allow for any fraction of one MWh to be carried forward to the following month or obligation period.

5.34 A group of generating stations must generate at least 0.25MWh in a month or obligation period in order to qualify for a NIROC.

ROC issue

5.35 ROCs are issued into the agent's RER account, and any ROC issue will be notified by email to the agent's designated contact email address. The notification will detail the number of ROCs issued, the month and year to which they refer and under which generator group they have been issued.

ROC revocation

5.36 Where a ROC is yet to be redeemed, the Orders set out instances where we may revoke a ROC and instances where we must revoke a ROC. We may revoke ROCs where:

- we are satisfied that the ROC has been issued on the basis of fraudulent behaviour, statement or undertaking on the part of the operator of the generating station or any connected person,
- we are satisfied that the information provided to us by an operator or agent in respect of the issue of ROCs is false,
- we are satisfied that the ROC is otherwise inaccurate,
- we are satisfied that the ROC should not have been issued,

- we have reasonable doubts as to the accuracy or reliability of the information on which the ROC issue was based, or
- due to a failure or refusal of any person to provide relevant information, we have been unable to check the accuracy of a ROC or any information on which basis the ROC was issued.

- 5.37 We must revoke NIROCs where the UR has notified us that it is not satisfied that the electricity in question has been supplied to customers in Northern Ireland.
- 5.38 If an agent has been acting fraudulently, all ROCs issued to the agent may be revoked, and replacement certificates may be re-issued. They can be re-issued either to the operator or, where a new agent has been appointed, to the new agent. ROCs can only be re-issued to an operator where it has had the equivalent of one ROC revoked.
- 5.39 Where we identify that one or more generating stations in a generator group have been acting fraudulently, the ROCs pertaining to the fraudulent activity will be revoked, and steps may be taken to remove the installation from the scheme.
- 5.40 Where we intend to revoke a ROC, we shall notify the person who is the registered holder of the ROC prior to revocation. We will also inform the generator of the electricity to which the ROC relates. Once a ROC has been revoked, the registered holder of the ROC will be sent a notification to this effect.
- 5.41 All revoked ROCs will have their status changed to 'revoked' on the RER and cannot be redeemed by a licensed electricity supplier when complying with their Renewables Obligation. The Orders require Ofgem to make details of revoked ROCs available to the public, and this information can be accessed via our public reports.
- 5.42 For further information on revoking, withholding or refusing to issue ROCs please refer to Chapter 5 of our Guidance for generators.

Late data and data amendments

- 5.43 The Orders provide Ofgem with discretion to accept generation data submitted outside of the two month deadline, assuming that we consider it appropriate to do so. Each request for late data is considered on a case-by-case basis.
- 5.44 The Orders also enable us, where we consider it appropriate, to accept amended data submissions. Data may require amendments for a number of reasons. For instance, the operator may subsequently realise that the information initially submitted is incorrect or Ofgem has become aware of this through another route, such as an audit.

5.45 For further information on how late data and data amendments are dealt with please refer to our Guidance for generators under the RO scheme.

Estimated data and pro-rated output data

Estimated Data

- 5.46 The Orders allow us to accept estimated data for ROC issue purposes where the operator satisfies us that it will never be possible for them to provide accurate data. An example of this could be the failure of metering equipment, which means that an accurate reading is not possible.
- 5.47 The method for estimating will need to be conservative and detailed when submitting the output data via the RER. The onus is on the agent to contact us as soon as the need for estimation arises and before the relevant data submission. Please refer to Chapter 4 of our Guidance for generators for further information on how estimated data is dealt with.

Pro-rated Data

- 5.48 Where the start and end meter readings do not correspond to the start and end of the period (ie, the start meter reading was not taken on 1 April and/or the end meter reading was not taken on 31 March), the output may have to be pro-rated for the period.
- 5.49 If pro-rating is required, agents should ensure that the start meter reading used is on or pre-1 April of the period in question and the end reading is on or after 31 March of the period in question.
- 5.50 The calculations used should be detailed on a separate sheet on the output data template spreadsheet and submitted simultaneously with the output data.

6. Contract termination

Chapter Summary

Here we explain the process of termination a contract between an operator and an agent. Under normal circumstances, these agreements should last until the end of an obligation period. Both operators of the generating stations and the agents have the option through the Orders to terminate their agent contract. The termination will take effect from 1 April of the new obligation period unless the contract is terminated in exceptional circumstances.

The process for contract termination

- 6.1 The Orders set out the steps that need to be taken when an operator or agent decide to terminate their agreement. In normal circumstances, an operator must remain with an agent until the end of the obligation period.
- 6.2 If an operator wishes to switch agents or end its agreement with an agent, or an agent wishes to end its agreement with an operator, we must be notified in writing. To enable the efficient administration of the scheme, we must be notified by 28 February at the latest, ie, a month before the start of the new obligation period, if the termination is to have effect.
- 6.3 When an operator switches agent, ROCs relating to the earlier obligation period will be issued to the original agent. This is a requirement under the Orders. For example, if agent A was acting on behalf of the operator for the 2021/22 obligation period but the operator switched to agent B for the 2022/23 obligation period, any ROCs relating to the earlier obligation period would still go to agent A.

Exceptional circumstances

- 6.4 The Orders allow operators and agents to terminate their agreements before the end of an obligation period in exceptional circumstances, with such termination having immediate effect. However, Ofgem has to be satisfied that the evidence provided constitute exceptional circumstances.
- 6.5 We will consider each request on a case-by-case basis. However, we will be most sympathetic to requests in the following circumstances:
 - death of an agent,
 - bankruptcy of an agent,

- receivership of an agent, or
- a party not meeting the requirements of their duties as detailed in the legislation and relevant guidance documents.

6.6 We are less likely to consider the following circumstances to be exceptional:

- better incentives offered by another agent, or
- disagreements between the agent and the operator.

6.7 It is important for the operator and agent to put in place appropriate arrangement for obtaining ROCs in the case of the bankruptcy of an agent.

6.8 When Ofgem decides that circumstances are exceptional and an operator changes agent during an obligation period, ROCs will be issued to the new agent or the operator from the termination date.

6.9 Ofgem is not responsible for apportioning output and it is up to the new agent to decide what to do with the ROCs issued. Similarly, Ofgem does not intervene with operator/agent disagreements and it is up to the parties involved to settle any disputes.

6.10 Should we decide that the circumstances are not exceptional, the operator will remain with its current agent until the end of the obligation period.

Appendix 1 – Agent registration number

Agents who represent one or more generating stations will be allocated unique registration numbers and these will be used to issue ROCs to individual generator groups.

Agent registration numbers differ from RO accreditation numbers in that they do not represent one generating station, but all stations in an agent's generator group with the same characteristics.

Each agent registration number is specific to a combination of requirements under the Orders. These are:

- the Order under which the operator applied (RO, RO(S) or NIRO)
- the generation type (hydro (NIRO only), biomass, wind (NIRO only) or photovoltaic (NIRO only)), and
- the frequency of submission (monthly or annual).

Some examples of agent registration numbers are as follows:

- an agent with a generator group representing micro-wind generators in Northern Ireland may have the number R00001EZNI; or
- an agent with a generator group representing micro-biomass generators in England may have the number R00001CXEN.

In order to differentiate between monthly and annual portfolios of stations, we would allocate two registration numbers. For example, an agent who is located in Scotland with a portfolio of biomass stations may have R00001DXSC to reflect output from stations on an annual submission and R00002DXSC to reflect output from stations on a monthly submission.

In the case of "**R00001DXSC**":

"**R**" signifies a ROC code

"**00001**" is a sequential number

"**DX**" is the technology code for micro-biomass generators located in Scotland who have an agent acting on their behalf, and

"**SC**" is the code for Scotland, the country in which the agent is located.

An agent may have up to 24 registration numbers.

Appendix 2 – Glossary

A

Act Electricity Act 1989 (as amended)

AD Anaerobic Digestion

B

BEIS The Department for Business, Energy and Industrial Strategy

C

CHP Combined Heat and Power

D

DETI Department for Enterprise, Trade and Investment

DfE Department for the Economy in Northern Ireland

DNC Declared Net Capacity

F

FMS Fuel Measurement and Sampling

FIT Feed-in Tariffs

G

GB Great Britain

K

kW Kilowatt

kWh Kilowatt hour

M

MW Megawatt

MWh Megawatt hour

N

NI Northern Ireland

NIRO	Northern Ireland Renewables Obligation
NIROC	Northern Ireland Renewables Obligation Certificate
O	
Ofgem	Office of Gas and Electricity Markets
P	
PV	Photovoltaic
R	
R&CHP	Renewables and Combined Heat and Power
REGO	Renewable Energy Guarantees of Origin
RER	Renewable Electricity Register
ROO	Renewables Obligation Order 2015 (as amended)
ROC	Renewables Obligation Certificate
RO(S)	Renewables Obligation Scotland
RPI	Retail Price Index
S	
SROC	Scottish Renewables Obligation Certificate
U	
UK	United Kingdom
UR	Utility Regulator in Northern Ireland