Fuel mix disclosure

Summary of responses and revised draft licence condition

November 2004 256/04

Summary

This document presents a summary of the issues raised by respondents to Ofgem's consultation on a draft licence condition to implement Article 3(6) of Directive 2003/54/EC of the European Parliament and of the Council concerning Common Rules for the Internal Market in Electricity ("the Directive"). This obliges Member States to require each supplier to provide details to its customers of the mix of fuels used to produce the electricity it supplies.

The Secretary of State for Trade and Industry has stated that she intends to implement the Article 3(6) requirement by way of a new supply licence condition introduced by means of regulations under section 2(2) of the European Communities Act.

Ofgem agreed to consult with suppliers and other stakeholders on the proposed licence condition and to advise the DTI of the results of the consultation. This document summarises the issues raised in the responses received and sets out Ofgem's comments. It also includes a re-drafted licence condition which takes account of the issues raised.

This document will be forwarded to the DTI. It will then be up to the DTI to lay regulations under section 2(2) of the European Communities Act 1972 to incorporate a new condition into all supply licences.

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1. Introduction

1.1 In July 2004 Ofgem published for comment a draft licence condition which would implement the requirements of Article 3(6) of Directive 2003/54/EC of the European Parliament and of the Council concerning Common Rules for the Internal Market in Electricity ("the Directive"). This obliges Member States to require each supplier to provide details to its customers of the mix of fuels used to produce the electricity it supplies.

1.2 The Secretary of State for Trade and Industry has stated that she intends to implement the Article 3(6) requirement by way of a new supply licence condition introduced by means of regulations under section 2(2) of the European Communities Act.

1.3 Ofgem agreed to consult with suppliers and other stakeholders on the proposed licence condition and to advise the DTI of the results of the consultation.

1.4 Full details of the Secretary of State's decision on the implementation of Article 3(6) are included in the DTI document, *Conclusions from the Responses to the Consultation on the Electricity Directive*, available from the DTI website at: www.dti.gov.uk/energy/domestic_markets/electricity_trading/elec_decision.pdf

General approach

1.5 The draft licence condition covered the following areas:

- the requirement to provide the information and the categories of energy source to be used
- the requirement to update the information in respect of electricity supplied in the previous financial year by 1 July each year
- the evidence required in relation to the calculation of fuel mix
- the method for calculation of environmental impacts
- the obligation to provide information on request to support any compliance monitoring and enforcement

1.6 Ofgem sought views on the draft licence condition, particularly in regard to the extent to which the condition meets the requirements of the Directive and the DTI June decision document. Fifteen replies to the consultation were received and Ofgem has held further discussions with suppliers and with the DTI. The responses are available on the Ofgem website . This document summarises the issues raised and sets out Ofgem's comments. It also includes a re-drafted licence condition which takes account of the issues raised.

1.7 This document will be forwarded to the DTI. It will then be up to the DTI to lay regulations under section 2(2) of the European Communities Act 1972 to incorporate a new condition into all supply licences.

1.8 Any further comments should therefore be directed to the DTI. The principal contact is:

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London SW1H 0ET

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2. Issues raised and Ofgem comments

General issues

2.1 The majority of respondents to the consultation welcomed the approach adopted by the DTI and Ofgem. They also found that the workshop organised by Ofgem was a useful way of discussing relevant issues.

2.2 One respondent thought that the proposed licence condition would increase the regulatory burden on suppliers and that it did not fit with claims that fuel mix labelling would be introduced in a way that would minimise impact and costs on consumers and suppliers.

Implementation

2.3 Some respondents questioned the method chosen to introduce the licence condition i.e. by way of regulations under section 2(2) of the European Communities Act. They questioned the legality of this approach under the Electricity Act 1989 and the Utilities Act 2000.

2.4 These respondents also suggested that the introduction of changes to the electricity supply licence by this route could set a precedent for licence modifications being made without regard to section 11A of the Electricity Act. They argued that the fuel mix disclosure licence changes should be implemented through the normal licence modification route.

Ofgem comments

2.5 The DTI's June Decision Document set out the Government's decision on implementation. The Department concluded that the appropriate means of implementing the fuel mix disclosure requirement was to use section 2(2) regulations to amend supply licences to include a new condition to lay down the minimum requirements of Article 3(6) of the Directive. This conclusion was based on legal advice and assessment of the alternatives. Ofgem's role has been to consult on the contents of a proposed licence condition to implement this decision; it is therefore not a matter for this consultation but for the DTI.

2.6 Ofgem will draw the concerns that respondents have raised over the method of implementation to the attention of the DTI.

Compliance cycle

2.7 A number of respondents were concerned about the compliance cycle and associated issues such as availability of data.

2.8 One concern for a number of respondents was the availability of the residual fuel mix table from the DTI; a delay in publishing this table, for any reason, could result in suppliers being in breach of the licence condition if there was an overrun on the compliance cycle.

2.9 Some respondents also stated that there would not be enough time between the end of the compliance year (1 April) and the date from which updated disclosure will be required (1 July). Suppliers have suggested that they need three months from availability of data to release of the bills and promotional material each year. It was also stated that as suppliers provide final data for the Renewables Obligation to the DTI by 20 June it would not be possible to meet the 1 July deadline.

2.10 It was suggested that Ofgem, DTI and suppliers should meet and agree on a timeline for the production of material so that a practical compliance cycle could be established. Another suggestion was that there should be a specified period within which suppliers were required to update material.

Ofgem comments

2.11 Implementation of this proposal seeks to balance the need to allow adequate time for suppliers to prepare the information with a desire for the information to be timely. The real constraints identified on the availability of information have been recognised and it is now proposed that the time allowed for updating the information should be extended to six months i.e. to 1 October each year. Accordingly, the new draft licence condition requires information in respect of the relevant disclosure period to be provided from 1 October each year.

2.12 The concerns regarding the availability of DTI data on which to base the calculations have been addressed by proposing that the information used should

be that which is available on the DTI website on 1 August each year. This will allows sufficient time for the Department to publish the relevant information for each disclosure period.

Promotional material

2.13 Most respondents proposed changes to the definition of promotional material. It was generally thought to be too open-ended and therefore impossible for a supplier to demonstrate compliance.

2.14 Suggestions for promotional material that should be excluded from the definition included: bill-boards, newspaper and magazine advertising, email marketing, direct mail and other items such as pens.

2.15 One respondent suggested that the requirement should be focussed on printed or online material which is specifically designed to support the marketing of electricity to potential new customers.

2.16 It was also suggested that it should apply to prospective customers only, for example in a welcome pack. All existing customers would be provided with the information before transferring their supply. A wider requirement, for instance on every item of promotional material, they argued would lead to a highly complex and costly system.

2.17 A number of respondents also called for a period of time to run down stocks of promotional material.

Ofgem comments

2.18 In preparing the revised draft for the DTI, Ofgem has taken account of the UK's obligation to implement fully the requirements of the Directive. This obligation may be compromised by limiting the range of the definition of "promotional materials" or by limiting their application to prospective customers. Ofgem recognises suppliers' concerns about the uncertainty in compliance. However, it considers that further potential compliance difficulties could arise as a result of an extremely detailed definition of promotional materials. Accordingly, the suggested definition of promotional materials is "materials sent directly or handed to consumers excluding newspaper and magazine advertisements". The

Commission guidelines also exclude billboard and television advertisements from the meaning of promotional materials. On the definition proposed for the licence condition, such advertisements are not promotional materials.

2.19 Ofgem considers that the additional time for compliance will allow suppliers sufficient time to manage their stocks of promotional materials in such a way as to minimise any difficulties of annual changeover.

Total supply and losses

2.20 One respondent sought clarification on the volume of electricity supplied by generators to NGC via the balancing market as this could be supplied to any or all of the supply licence holders. One respondent also argued that distributed generation such as micro-CHP would also need to be taken into account.

2.21 One respondent asked for clarification regarding losses. Paragraph 2.8 of the consultation document refers to the amount of electricity supplied "as notified to the DTI in conjunction with the Renewables Obligation". The respondent pointed out that losses are taken into account in submissions to DTI but not in those to Ofgem. This could potentially lead to challenges to the accuracy of the information.

2.22 However, another respondent emphasised that the key to a successful scheme was to ensure that it was kept as simple as possible. Any extra complications could end up being expensive to manage and would not add any significant benefits. They stated that estimating distribution losses and grid correction factors in relation to supply could be counter-productive.

Ofgem comments

2.23 Electricity that is traded without reference to fuel mix, or which cannot be identified may be dealt with through the residual fuel mix provisions (paragraph 10 in the revised draft licence condition); this should address issues regarding electricity supplied via the balancing market.

2.24 Ofgem recognises that it is desirable to incorporate the treatment of losses into the calculation of fuel mix and environmental impact. It is therefore proposed that the total amount purchased for supply by the licensee should be the relevant

denominator for the purpose of the calculations. The revised draft licence condition therefore proposes that the amount supplied should be increased by a standardised losses factor. Use of an average figure is considered to be consistent with the general level of precision in the calculations.

Evidence requirements

2.25 The DTI's June Decision Document announced that in the longer term, Renewable Energy Guarantees of Origin (REGOs) were to be the primary evidence for identification of supply as renewable, and for other fuel sources, generator declarations should be used. If neither of these is available, the residual fuel mix should be used. As an interim measure, covering the first disclosure period (1 April 2004 to 31 March 2005), generator declarations may be used as evidence for electricity sourced from renewables.

2.26 Many respondents sought further clarification over what systems should be used in the first year as evidence of renewable energy. They sought clarification over the use of Renewable Obligation Certificates (ROCs), Climate Change Levy Exemption Certificates (LECs) and REGOs.

2.27 One respondent stated that an opportunity had been missed to maximise the use of an existing scheme for the certification of renewables by using the existing ROC scheme. Another respondent showed a preference for using LECs for demonstrating that electricity supplied is from a renewable source, making maximum use of an existing certification system.

2.28 Another respondent commented that it was assumed that REGOs would be voluntary and have no monetary value. If they were required to be the sole scheme for fuel labelling then this effectively made them compulsory, implying a financial value. Another thought that in some instances some smaller generators might charge for issuing declarations. Suppliers have numerous contracts with small generators and obtaining declarations for each one could prove to be a significant financial and administrative burden.

2.29 One respondent stated that it was appropriate to use REGOs and that, until this system was running, generator declarations should be used.

2.30 Another suggestion was for suppliers who are in possession of a ROC to be automatically issued with a REGO, leaving only large hydro to be dealt with separately. This would make best use of existing certification systems where possible to verify green supply.

2.31 One thought that a more appropriate solution would be to use existing contracts in place between suppliers and generators. The respondent said that the power associated with these contracts could be easily verified and would provide an acceptable standard of proof that a supplier's fuel label was reliable.

Ofgem comments

2.32 In drafting the licence condition, Ofgem was guided by the basic requirements for evidence set out in the DTI's June Decision Document and it would not be appropriate to revisit this decision in this consultation.

2.33 It should be noted however, that the decision does not preclude the use of REGOs in the first year; REGOs will be available, and may be used if it is the preferred approach for the supplier and generators concerned. It is also important to note that if a supplier is not in possession of a REGO, the residual fuel mix figures may be used. No compulsion is placed on suppliers or generators to opt into the REGO scheme.

2.34 Ofgem will draw the concerns that respondents have raised to the attention of the DTI.

Issue and administration of REGOs

2.35 A number of respondents also asked for clarification on the implementation of the REGO register system and as to whether REGOs were separately tradable. Clarification was also sought on the amount of time between generation and issue of REGOs.

2.36 One respondent noted that only REGOs issued by Ofgem will be recognised although the EU Renewables Directive states that REGOs should be recognised by other Member States. It was also pointed out that overseas REGOs should not be accepted unless it is shown that the electricity was brought to the GB system

and that they were not being counted in the country of origin for fuel mix disclosure purposes.

Ofgem comments

2.37 Ofgem published its procedures for REGOs on 5 October 2004[1]. These clarify many of the questions raised in the responses. The Electricity (Guarantees of Origin of Electricity Produced from Renewable Energy Sources) Regulations 2003 are silent on whether REGOs and the electricity to which they relate are separately tradable and this is reflected in the REGO procedures. The draft licence condition does not create constraints on the transfer of REGOs. However, the revised draft licence condition requires that the licensee can show evidence of supply in Great Britain in the case of REGOs that have been issued in another Member State.

Generator declarations

2.38 One respondent pointed out that there is no requirement for generators to issue declarations and that a contract trail already exists for 2004/5 without any provision for generator declarations. Additionally, suppliers should not be held responsible for the accuracy and reliability of the information provided by generators which is beyond their control.

2.39 The respondent also stated that there was no mechanism to stop suppliers from trading the declarations which could mean that some suppliers holding declarations that did not correspond with the electricity that they had purchased.

2.40 Further clarification was requested regarding which measure of output would be used for generator declarations and how power stations which use more than one fuel would allocate their output by fuel.

[1] www.ofgem.gov.uk/ofgem/work/index.jsp?section=/areasofwork/guarantee

Ofgem comments

2.41 The requirements of the proposed licence condition in this regard have been redrafted to clarify a number of aspects of the use of generator declarations. These are:

- Generator declarations should specify the supplier to which the output is assigned
- Output for multi-fuel stations should be apportioned according to the calorific value of input fuel
- There must be evidence of supply in Great Britain for declarations relating to generation outside Great Britain

Emission factors

2.42 The consultation paper raised the question of whether there should be the opportunity for suppliers to base emissions information on station-specific factors or whether only the published factors for each fuel should be used. Respondents were divided on this issue with a number of responses proposing each option. One respondent stated that this amounted to an unnecessary level of detail, given the proportion of electricity that is traded through exchanges. Another thought that the option to use this data should be left open at this stage as any advantages or disadvantages had not been fully weighed up, although they did not want their use to be mandatory.

2.43 Another respondent wanted to ensure that all suppliers based their information on the same set of data to ensure consistency and so customers can make true comparisons when comparing different suppliers.

2.44 In addition, some respondents stated that the emission factors used should be the ones agreed between the industry's Joint Environmental Programme (JEP) and the Environment Agency.

Ofgem comments

2.45 The use of station-specific information would allow suppliers to reflect better the actual emissions of the generators from which they are acquiring electricity.

However, Ofgem considers that it would be too onerous on suppliers to obtain this information for all generators. Applying average figures for some generation and station-specific information for other generation would potentially lead to distorted figures. For this reason, and to ensure simplicity and some degree of standardisation, it has been decided that only average emission figures should be used.

2.46 The contents of the DTI data table are beyond the scope of the current consultation as the licence condition cannot bind the DTI. Ofgem intends however to work closely with the DTI, suppliers and other interested parties to explore options and agree the contents of the table.

Other

2.47 Respondents sought clarification on issues relating to countries outside Great Britain. This included:

- the process applicable to power imported from other Member States (e.g. Belgium) via an intermediate state (e.g. France); and
- the position regarding Northern Ireland.

2.48 One of the respondents wondered how aggregate figures, for electricity obtained via an electricity exchange or from outside the EU, would be calculated. One respondent stated that it would be difficult for power exchanges to provide information on fuel sources as all contracts are traded anonymously and counterparties never know who they traded with. They were also worried that if suppliers were forced to trade differently as a result of fuel mix disclosure it could impact on the forward market liquidity and could be a step back in the liberalisation process.

2.49 Obligations are placed on supply licensees only. One respondent wondered what requirement obliges generators to supply information already and whether this information is accurate and timely.

2.50 Two respondents stated that they would like to see an additional regulatory impact assessment of the proposals due to the decision of the DTI that REGOs will be used to verify electricity from renewable sources. They suggest that the

costs that will arise from trading of REGOs were not taken into account by the earlier consultation.

Ofgem comments

2.51 As noted above it is intended that where evidence of fuel mix is sourced from outside Great Britain, suppliers should also hold evidence that the electricity to which it related has been supplied in Great Britain.

2.52 The provisions relating the electricity exchanges have been clarified in the revised draft licence condition. Where information is available from electricity exchanges, it may be used for fuel mix disclosure; this is a requirement of the Directive. Ofgem recognises that given the liberalised UK energy market and the nature of electricity trading, it is unlikely that this information will be available.

Verification

2.53 The consultation document specifically sought views on the appropriateness of the proposed system of verification. Most of the respondents addressed these issues. Many thought that the proposed licence condition went too far. It was suggested that Ofgem's existing powers under the Electricity Act were sufficient to ensure compliance with the licence condition.

2.54 A few respondents thought that accredited auditors could be used to certify that suppliers had discharged their responsibilities.

2.55 One respondent asked how long the data evidencing fuel mix should be retained.

Ofgem comments

2.56 Ofgem considers that it is necessary to include specific powers to obtain information in order to allow for random audit of the information held by a supplier if necessary. The revised draft retains the obligation to provide on request the information necessary to verify the fuel mix and environmental information required by the licence condition. The revised draft does not include a requirement to allow examination of evidence at the licensee's premises.

2.57 While it is likely that the use of external auditors may assist suppliers in compliance with the licence condition, Ofgem considers that this should not be made mandatory.

2.58 There is no precedent in the licences for limiting the time for which information must be retained. The licensee must, in effect, make its own assessment in this area.

Guidance

2.59 Some of respondents stated they would welcome guidance on best practice but were cautious about the extent to which suppliers would be expected to adopt it. They emphasised that the guidance should not be overly prescriptive and stifle innovation in a competitive market place. A number specifically stated they did not want the guidance to be mandatory.

2.60 Some respondents also wanted to ensure that the guidance did not force the publication of information in a format that was not consistent with suppliers' brands. Another encouraged Ofgem to notify interested parties at the earliest opportunity regarding the design of the table and offered their input.

2.61 Guidance was requested by one of the respondents on the requirements for disclosure of the overall mix in addition to any product sub-division.

2.62 One respondent called for the guidance to be easily understandable by consumers as well as industry, so that that there is full understanding of how fuel mix disclosure works and how supply companies should be implementing it.

2.63 Another respondent thought that there was no need for Ofgem to produce guidance as information had already been produced by the European Commission on the production of a fuel label.

Ofgem comments

2.64 Ofgem intends to produce non-binding guidance to encourage good practice by suppliers when complying with the licence condition; some standardisation between suppliers would be in the interests of providing clear information to consumers. Any enforcement action by Ofgem would be in response to a

contravention or likely contravention of the licence condition itself, rather than the guidance.

2.65 Ofgem intends to consult with the DTI, suppliers and other interested parties in developing the guidance.

Other points

Billing issues

2.66 One respondent thought that, in addition to provisions mentioned in paragraph 2.3 of the consultation document, provision should be made for direct debit customers and for those who do not receive any bill for 12 months or more because of failure by their supplier to produce one. Respondents sought clarification as to whether the failure to send out a bill or statement would be an automatic breach of the licence condition.

Ofgem comments

2.67 As stated in the consultation document, it is not intended that the new licence condition will introduce any new obligations in regard to frequency of billing.

Sources for environmental information

2.68 One of the respondents stated that suppliers should be free to choose the method by which they presented the information to their customers. They stated that the proposed licence condition requires them to provide it via a website, information on a bill, and on a separate insert with the bill.

2.69 One respondent wanted clarification of the units that can be used to express the fuel mix and emissions of CO_2 and radioactive waste. They thought that consumer understanding of the different figures might be limited and suggested that some cross-referencing could be useful.

Ofgem comments

2.70 The proposed licence condition reflects the minimum standards to which suppliers must adhere. A supplier may choose to provide more information than required by the new licence condition. The proposed condition, consistent with

the Directive, does not specify that information must be presented on a website. This is clarified in the revised draft.

Obligation on licensees

2.71 One respondent thought that disclosure should be by brand rather than supply licence. This is because different brands may have different fuel mixes.

2.72 One respondent supplies services to new entrant suppliers. To minimise the cost, their clients are able to enter the market and supply electricity under their licence. Customers are not aware of this as all branding is in the name of the client business rather than the company holding the supply licence. However, under the proposed licence condition, the overall fuel mix of the licence would be required to be reported. This would not be useful for the individual clients who may be marketing specific products such as a green supply, whilst others may be supplying totally non-renewable electricity. In this case customers would not be interested in the overall fuel mix, rather the fuel mix of the company that they see their electricity coming from.

2.73 Respondents thought that this may leave companies open to mis-selling allegations if they have sold customers a 100% renewable product and the fuel mix shows otherwise.

Ofgem comments

2.74 The DTI's June decision document stated that the legal obligation to provide the label and the information on its fuel mix and the environmental impact would be placed on each supply licensee and be enforceable by Ofgem on that basis. The figures provided will therefore need to relate to the licensee. The licence condition requires suppliers to make clear with the information that it relates to the fuel mix of the licensee.

3. Revised draft licence condition

1. In this condition:

   "disclosure period" means each period of 1 April to 31 March after 31 March 2004.

   "energy source" means the fuel used for the generation of the electricity supplied by the licensee being coal, natural gas, nuclear, renewable or other.

   "fuel mix disclosure data table" means a table published by the Department of Trade and Industry on its website by 1 August each year after 31 July 2005 and identified as for use by suppliers for the calculation of the amount of each energy source in the residual fuel mix for the purposes of paragraph 10 and the information about environmental impact for the purposes of paragraph 12.

   "guarantee of origin" means a certificate issued or recognised by the Authority under The Electricity (Guarantees of Origin of Electricity Produced from Renewable Energy Sources) Regulations 2003.

   "other" means derived from a fuel other than coal, natural gas, nuclear or renewable.

   "promotional materials" means materials other than newspapers and magazines handed out or sent directly to consumers .

   "renewable" means wind, solar, geothermal, wave, tidal, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.

   "total amount of electricity purchased for supply by the licensee" means the sum of the figures determined by the licensee under article 6(3) of the Renewables Obligation Order 2002 and article 6(3) of the Renewables Obligation (Scotland) Order 2004 multiplied by a factor provided in the fuel mix disclosure data table to allow transmission and distribution losses to be accounted for.

2. Provided the licensee has supplied electricity for a full disclosure period, it shall provide the information referred to in paragraph 3:

   (a) at least once in a 12 month period, to each customer that receives a bill or a statement in that period, either with or on the bill or the statement; and

   (b) in promotional materials.

3. In respect of each disclosure period the information referred to in paragraph 2 is:

   (a) the contribution of each energy source even where the contribution is necessarily expressed as zero, to the total amount of electricity purchased for supply by the licensee; and

   (b) the environmental impact resulting from the total amount of electricity purchased for supply by the licensee at least in terms of emissions of carbon dioxide and the radioactive waste.

4. The contribution referred to in sub-paragraph 3(a) must be expressed as a percentage of the total amount of electricity purchased for supply by the licensee, rounded to the nearest whole percentage point.

5. The information referred to in sub-paragraph 3(b) may be provided by means of a reference to an existing reference source provided that such reference is sufficiently clear to enable the source to be accessed directly and that the purpose for which the reference is provided is stated on or with the bill or statement and on promotional materials.

6. The licensee shall indicate clearly with the information referred to in paragraphs 2 and 3:

   (a) the disclosure period to which the information relates.

   (b) that the information relates to the total amount of electricity purchased for supply by the licensee.

7. Subject to paragraph 2, when the licensee is required to provide the information referred to in paragraphs 2 and 3 it shall:

   (a) provide the information on and from 1 October immediately following the end of the disclosure period; and

   (b) update the information on and from each 1 October thereafter.

8. Subject to paragraphs 9 and 10, the licensee shall claim a contribution referred to in sub-paragraph 3(a) where specified evidence in relation to the electricity is held such that an energy source shall be:

   (a) renewable when the licensee holds in its account in the register of guarantees of origin at midday on 1 July immediately following the end of the disclosure period a guarantee of origin relating to generation in the disclosure period, or, until 1 July 2006 only, a generator declaration containing the details specified in paragraph 11; or,

   (b) coal, natural gas, nuclear or other when the licensee holds a generator declaration containing the details specified in paragraph 11; or

(c) in the case of electricity obtained via an electricity exchange or imported from an undertaking outside the Community, where aggregate figures are provided by the electricity exchange or undertaking and such figures identify the amount of electricity produced from a particular energy source.

9. The licensee shall only rely on a guarantee of origin issued in another Member State or a generator declaration from a generator outside Great Britain where:

(a) it holds evidence of supply in Great Britain of the electricity referred to in the guarantee of origin or generator declaration, and

(b) the guarantee of origin or generator declaration has not been used as evidence of fuel mix by the licensee in another Member State.

10. Where the licensee does not hold the evidence required under paragraph 8 in respect of an amount of electricity purchased for supply by the licensee, the licensee shall apportion the amount of electricity in respect of which evidence is not held to each energy source according to the percentages detailed in the fuel mix disclosure data table.

11. A generator declaration referred to in paragraph 8 shall include:

(a) the name and location of the generating station; and

(b) the name of the licensee to which the information in the generator declaration relates; and

(c) the disclosure period to which the generator declaration relates; and

(d) the fuel used in the generating station, and when the generating station uses more than one fuel the proportion of each fuel used according to the calorific value of input fuel; and

(e) the amount of electricity assigned to the licensee expressed in MWh; and

(f) a statement that the generator has not issued generator declarations or transferred guarantees of origin in relation to an amount of electricity that exceeds the total output of the generating station in the disclosure period; and

(g) the signature of a director of the generation company or person of similar standing where the generation licensee is not a company to verify the facts referred to in sub-paragraphs (a) to (f).

12. For the purpose of sub-paragraph 3(b), the licensee shall only refer to information expressed in terms of grams per kWh in the case of carbon dioxide and micrograms per kWh in the case of radioactive waste, where the figures are calculated:

    (a) for carbon dioxide emissions, by multiplying the percentage of each energy source as calculated according to sub-paragraph 3(a) and paragraph 10 by the CO_2 emission rate for each energy source as appears in the fuel mix disclosure data table and totalling the result obtained for each energy source; or

    (b) for radioactive waste, by multiplying the percentage of nuclear as calculated according to sub-paragraph 3(a) and paragraph 10 by the rate of radioactive waste as appears in the fuel mix disclosure data table.

13. The licensee shall upon request by the Authority provide to the Authority such information in such form and within such time as the Authority may reasonably require for the purpose of establishing whether, in the Authority's opinion, the licensee is complying or has complied with the requirements of this licence condition.