

From: Bryony Worthington [bryonyw@foe.co.uk]
Sent: 30 June 2005 15:55
To: John Costyn; SEA
Cc: Alex Phillips
Subject: review of guidelines for green electricity tariffs

Dear John

Sorry not to be submitting a more full response to the consultation but here are our thoughts.

We support the revised guidelines and would like to see them implemented quickly. We maintain that in addition to these guidelines an accreditation scheme is needed to distinguish between tariffs which have weak and strong green credentials, and also to ensure that all green claims are automatically verified by an independent third party at regular intervals. As OFGEM has a duty to protect consumers we believe this issue should be prioritised and that the development of an accreditation scheme should be included in OFGEMs future workplan.

We have for a long time been concerned about the issue of double counting between commercial and domestic offerings and fully support the extension of the guidelines to cover commercial offerings. We agree that REGOs should be used in both markets as the de minimus requirement for a tariff to be described as renewable or as contributing to reducing an individual or company's greenhouse gas emissions.

On the issue of additionality we still consider that ROC retirement is a valid approach and it has the advantage of being easily auditable. We should design an accreditation system with a view to the long term. We believe over time, as supply and demand for ROCs get closer together, and, as the voluntary market grows, ROC retirement offers a very clear way of delivering additionality.

We would also support the idea of carbon offsetting - ie purchase and retirement of EU or international carbon credits (ie CDM and JI as long as they were gold standard) as an alternative way of delivering an environmental benefit through voluntary consumer action in the electricity market. This could be extended to enable gas tariffs to be offset too.

I hope this is useful. Good luck with the final stages of finalising the guidelines.

My colleague Alex Phillips (0207 566 1673 alexp@foe.co.uk) will be looking after this area of work after I leave but it is unlikely to be a priority work area for us in the short to medium term.

I may be in touch in my new capacity with SSE, either way I hope our paths continue to cross in the future.

All the best

Bryony

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35% of our electricity is still produced from coal burnt in old inefficient power stations which make a massive contribution to climate change. Help shut these dinosaurs down by visiting:

www.foe.co.uk/campaigns/climate/press_for_change/carbon_dinosaurs

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