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Clair Hogg
Ofgem
European Strategy & Environment
9 Millbank
London
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8th January 2008

Dear Clair,

Response to Consultation: Cutting the green customer confusion – next steps

Helius Energy broadly supports an approach to reduce customer confusion relating to renewable electricity supply whilst ensuring the administrative burden on upstream generators is kept to a minimum. Otherwise, please find attached a response to elements of the above consultation relating to Carbon Intensity.

As an imminent biomass energy generator Helius Energy wishes to ensure that any reporting is relevant and appropriate and indeed reflects the intent of transparency to allow better choice by consumers. As such, Carbon Intensity for biomass should reflect the life cycle approach adopted in emission reporting legislation and renewable policies, where biomass is allowed a zero CO₂ emission status.

As stated in the consultation document biomass would be in the worst CO₂ emission category which is actually misleading to the consumer, going against the intent. Helius Energy strongly believes biomass should be rated as zero emissions as it is in national carbon accounting.

Helius Energy is supportive of using carbon intensity as an approach we request a more holistic attitude in setting categories.

Please find here responses to Q13, Q15 & Q17

13. Is it appropriate to rate supply tariffs by their carbon intensity to allow an at-a glance comparison of different offerings made by each supplier as well as competing tariffs across different suppliers?

Yes.

15. Is it appropriate to calculate carbon intensity using standardised emission factors at the point of generation, and recognising the lower emissions of certain technologies eg CCS and CHP?

Yes

17. Are the illustrative bands presented in this document appropriate? If not, how should they be amended?

No, as noted above, the band for biomass is completely inappropriate.

Yours sincerely

Chris Corner
Commercial Director
Helius Energy plc