

Office of Gas and Electricity Markets Consultation: The green supply guidelines

Response by BSI British Standards

Introduction

As the UK's National Standards Body, BSI British Standards welcomes this opportunity to comment on this consultation.

We note that the principal consideration in this review is for Ofgem to clarify for customers the specifics of green tariffs. Clear guidelines are needed for electricity suppliers on how they report, verify and demonstrate green tariffs environmental benefits. It is also important that an independent, trusted and measurable guidance is established that has the confidence of the whole market that allows accreditation of suppliers.

BSI Response to questions in Chapter 4

Question 2: What form of accreditation scheme will it be possible to deliver by the end of 2008?

BSI British Standards would like to comment on the proposals in paragraph 4.3, in particular the suggestion that suppliers take the "lead in developing the high level principles and minimum standards contained within the green supply guidelines into more detailed requirements that will be applied through the independent accreditation scheme".

An effective certification or accreditation scheme must be underpinned by detailed requirements that are:

- robust
- verifiable by a third party
- unambiguous.

Many certification or accreditation schemes already operating successfully in the UK are underpinned by formal British (BS), European (EN) or International (ISO) Standards or BSI Publicly Available Specifications (PAS). Care should be taken to ensure the detailed requirements developed to support the Green Supply Guidelines are appropriate for third party certification or accreditation. This will ensure the information provided to the customer is credible and can be substantiated, as is the case with existing certification or accreditation schemes based on requirements standards developed by BSI, the European Organization for Standardization (CEN) and the International Organization for Standardization (ISO).

Ofgem has suggested that the involvement of the suppliers in the development of the detailed requirements is critical. BSI would support the involvement of the suppliers and this approach corresponds with two of the underlying principles of standards development – the involvement of all interested stakeholders and delivering consensus between stakeholders.

BSI British Standards can provide a well-established, independent framework within which to develop the detailed requirements referred to in Ofgem's consultation document, ensuring transparency, consideration of all stakeholder views and consensus-building. Working within this framework will also ensure that the detailed requirements are appropriate for independent certification/accreditation.

Question 3: Are there strong reasons to delay establishment of the accreditation scheme beyond the end of 2008? If there are, please explain why and what the benefits of delay would be?

OFGEM should ensure there is sufficient time to develop the detailed requirements referred to in paragraph. BSI would welcome further correspondence with Ofgem to discuss specific requirements in full.

BSI British Standards: Information

BSI British Standards is the UK's National Standards Body, incorporated by Royal Charter and responsible independently for preparing British Standards and related publications. BSI has 107 years of experience in serving the interest of a wide range of stakeholders including government, business and society.

BSI presents the UK view on standards in Europe (to CEN and CENELEC) and internationally (to ISO and IEC). BSI has a globally recognized reputation for independence, integrity and innovation ensuring standards are useful, relevant and authoritative.

A BSI (as well as CEN/CENELEC, ISO/IEC) standard is a document defining best practice, established by consensus. Each standard is kept current through a process of maintenance and reviewed whereby it is updated, revised or withdrawn as necessary.

Standards are designed to set out clear and unambiguous provisions and objectives. Although standards are voluntary and separate from legal and regulatory systems, they can be used to support or complement legislation.

Standards are developed when there is a defined market need through comprehensive consultation with stakeholders and a rigorous development process. Committee members represent their 'communities' in order to develop standards and related documents by consensus. They include representatives from a range of bodies, including government, business, consumers, academic institutions, social interests, regulators and trade unions.

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