

Response to stakeholder feedback on the draft 2013 RO guidance documents

On 20 December 2012 Ofgem published updated drafts of the Guidance for Generators and the Fuel Measurement and Sampling (FMS) guidance to take into account the government's 2013 banding review amendments. The purpose of publishing the documents in draft was to seek views from stakeholders on the proposed changes. The feedback period closed on 20 February 2013. We have reviewed all responses and, where appropriate, have updated the guidance documents accordingly. The updated drafts were published on 3 April 2013. The final versions will be published once the NIRO Order 2013 is in force.

On 11 March 2013 Ofgem published updated drafts of the 'Biodiesel and Fossil Derived Bioliquids guidance' and the 'Guidance for licensed electricity suppliers' for feedback by 25 March 2013. The changes made to these documents were minimal and we received no feedback on the proposed changes. These documents were also published in draft form on 3 April 2013. The final versions will also be published once the NIRO Order 2013 is in force.

The feedback period

We would like to thank all stakeholders who took the opportunity to provide feedback on the updated drafts. Overall the feedback we received was positive, including that the proposed changes were clear and comprehensive. We received a number of responses relating to the policy intent behind some of the changes. The Department of Energy and Climate Change (DECC) is responsible for developing RO policy and so Ofgem, as the administrators of the scheme, cannot provide feedback on policy queries. We have forwarded these responses to DECC for their information. The remainder of the feedback received focussed on specific areas recommending that further information be provided. Where this feedback has led to changes to the guidance documents, this has been listed below along with the according section number.

Guidance for Generators

- The front page overview and executive summary have been updated to take into account the later date that the NIRO legislation comes into force.
- The entire document has been updated to reflect the fact that the NIRO legislation is expected to come into force on 1 May 2013.
- 2.28 – 2.29: the grace period text has been updated to take into account the dates under the NIRO which are set out in the draft laid NIRO legislation.
- 2.30 – 2.31: the information on the Devolved Administrations has been updated.

- 4.4 – a minor update has been made to provide further clarity on the information declaration.
- 4.59 – 4.63: further information provided on withdrawal of accreditation.
- 4.90: update to the information provided on the five month extension to the period in which a generator will have the choice to claim the CHP uplift or to gain support under the Renewable Heat Incentive (RHI) under the NIRO.
- 4.91 – 4.94: update to the grace period information relating to the dates under the NIRO.
- Appendix 1 (1.15, bullet point 5): minor update to the list of what constitutes a generating station to take into account non-fuelled stations where there is more than one way of generating electricity on the same site.
- Appendix 4: The ROC codes have now been inserted.
- Appendix 5: the pre-2013 capacity definition and 2013/14 capacity definition for NIRO generating stations have been updated.
- Appendix 6 (6.6-6.13): the explanation of the banding tables has been updated. The banding tables on pages 99 – 101 now also include the ROS and NIRO support levels.

FMS guidance

- The front page overview and executive summary have been updated to take into account the later date that the NIRO legislation comes into force.
- The entire document has been updated to reflect the fact that the NIRO legislation is expected to come into force on 1 May 2013.
- 2.12: the information on the ROS biomass capacity ceiling has been updated to reflect the ROS legislation.
- 2.28: the text on the 'high density' part of the energy crop has been updated to note that we are considering the guideline values that should apply and will publish further information in due course.
- 2.43 – 45: new text has been added on ancillary fossil fuel use to provide further clarity.
- 2.49 – 50: new text has been added to give further information on co-firing.
- 2.51-2.52: the energy crop uplift information has been updated.
- 2.58-2.59: additional text added on 'relevant fossil fuel generating stations'.
- 2.63 and 2.66: new text added on where the energy crop definition does not apply.
- 2.75: new text has been added on the CHP uplift for co-firing stations.
- 2.82: update to the information provided on the five month extension to the period in which a generator will have the choice to claim the CHP uplift or to gain support under the Renewable Heat Incentive (RHI) under the NIRO.
- 3.26-28: the sustainability text has been updated.
- 3.117-3.125: further information on co-firing/conversion has been provided.
- 4.17: new text has been added on monthly data submissions with an additional screenshot (Figure 6) provided.

- 4.28: the text has been updated to state the mass or volume of fuels used, and the GCVS used, should be given to a maximum of 2 decimal places.
- Appendix 3: the ROC support level tables now include the ROS and NIRO support levels.