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By email: CCLandREGO@ofgem.gov.uk

Dear Sir or Madam

Open letter on proposed changes to the recognition process for EU Guarantees of Origin (GoO) for GB Fuel Mix Disclosure (FMD).

Thank you for the opportunity to respond to your consultation. Centrica is responding as a user of the EU GoO recognition process for use in GB Fuel Mix Disclosure (FMD).

We welcome Ofgem's decision to standardise the process and largely support the proposed methodology. We have identified a few areas where further clarity and or improvements would better align the process with timelines in existing guidelines and legislation and support a more efficient redemption and retirement process.

1. The LEC physical redemption date should be amended to 1st August to be consistent with the FIT guidance.

The draft new process guidance requires the LEC to be redeemed 1st July. We would like the date for physical redemption to be extended to 1st August to match the FIT guidance. We are concerned that March LECS are only issued in mid-June, leaving market participants only two weeks to reconcile them, collate the relevant data for HMRC balancing and averaging and to physically redeem the certificates.

We appreciate that the physical redemption and retirement of the LEC is necessary to demonstrate the supply has been made in the UK, but we think that the FMD 1st of July cut off could still be legally achieved, whilst allowing a month's grace for the physical redemption to occur.

2. Commercially confidential information must be excluded from the published spreadsheet that Ofgem compiles of all EU GoOs recognised for FMD in the financial year.

Some of the information market participants are asked to enter into their master spreadsheets will be commercially confidential and should be excluded from Ofgem's published spreadsheet, referred to in paragraph 2.14 of the draft guidance, showing all EU GoOs recognised for a financial year and. In particular, the identification of the previous holder of a GoO is commercially sensitive and must be withheld from the published version.

3. Standard naming conventions should be used to minimise validation errors, where appropriate

We often see several names being used for the same GoO issuing body. It would facilitate the verification process for all parties, if Ofgem could create a defined list to ensure all suppliers use the same naming conventions. The defined name could also be inserted into drop-down lists in the spreadsheet.

Final comments

We hope this review will result in a robust and stable user-friendly regime. Any future amendments should be consulted on in a timely manner, giving all parties reasonable time for the implementation of necessary changes.

Please contact me or my colleague Carys Rhianwen (Carys.Rhianwen@centrica.com) if you would like to discuss any of these points further. This response may be published on the Ofgem website.

Yours faithfully,

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