

Renewables Obligation (RO) Guidance

Commissioning

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Introduction

This document is for generators accredited under the Renewables Obligation (RO) schemes in England, Scotland, Wales and Northern Ireland, and it provides an overview of how to establish the date a generating station was commissioned in line with the definition provided in Renewables Obligation (RO) legislation. Establishing the date is important as it signifies the date from which the accreditation will be effective from.

This document is not intended to be a definitive legal guide. If an operator of a generating station is in doubt as to the commissioning date of their generating station, they should seek independent legal or technical advice as appropriate.

The scheme closed to new generating capacity on 31 March 2017. This guidance has been updated to reflect that there are no new applications but can be used as a guide to establish the date your generating station was commissioned.

For further information, we encourage you to read the Renewables Obligation: Guidance for Generators.

Commissioning date

The commissioning date represents the date on which all relevant commissioning tests and procedures were completed and the generating station was capable of commercial operation. This is entered in the Renewable Electricity Register (RER) for each capacity separately in the capacity table within the generating station application. The tests and procedures will vary depending on the type of generating station in question and what the usual industry standard practices were at the time the generating station was commissioned.

If a generating station met all relevant eligibility requirements the scheme, it would have been eligible from the later of the following:

- the date the application was received by us or
- the date on which it was commissioned.

We asked operators to provide suitable evidence during the accreditation process to show that a generating station had been commissioned. For accreditation to have been granted under the RO, in addition to the station meeting other eligibility criteria, the following definition of “commissioned” must have been met:

“Commissioned”, in relation to a generating station, means the completion of such procedures and tests in relation to that generating station as constitute, at the time they are undertaken, the usual industry standards and practices for commissioning that type of generating station in order to demonstrate that that generating station is capable of commercial operation.

How to demonstrate a generating station has been commissioned

As the applicant, an operator produced documentary evidence that demonstrated the generating station had been commissioned. We encouraged the operators of a generating station to provide as much evidence as they could in their application to show that their generating station met the definition of commissioned. The relevant documents for the generating station will vary depending on the renewable technology being used. In general, the following documents were considered as an example of a complete submission. Where these documents were available, they were the minimum that you'll be expected to provide.

- An explanation as to why the commissioning date is **/**/****, with a brief timeline of the tests and procedures that led to commissioning on this date.
- The G59 witness test certificate signed and dated by the relevant distribution network operator (DNO). This should state the DNO they are from and be signed by the testing engineer. If the DNO did not need to witness the G59 test, they would then send a letter or email stating that they did not wish to witness the test. For generating stations in Northern Ireland, the G59 should have normally included the accompanying Schedule 1A document signed by the DNO stating that they witnessed the testing or waived the right to witness the testing. Where a project is connected to a transmission system, we would have expected to see equivalent documentation to prove that the transmission operator was content for the generating station to operate in parallel with its network.
- Independent written confirmation of the commissioning date which could include a signed declaration or handover certificate by the installer or commissioning engineer who carried out the tests and procedures for commissioning. This should confirm the date the generating station and all

relevant components were commissioned. We would also accept other forms of independent written confirmation.

- A signed statement from the installer or manufacturer of the generating equipment confirming the generating station's total installed capacity (TIC) and declared net capacity (DNC).
- Half hourly (HH) meter readings showing first generation. Evidence of initial generation was used in the assessment of the commissioning date but was not definitive. It may be the case that generation took place before the generating station was capable of commercial operation. Conversely, a generating station may be capable of commercial operation before initial generation took place.

Where necessary, we may ask for more detailed information as each application is assessed on a case-by-case basis.

TIP 1: A G59 witness test certificate and commissioning certificate must state the date the testing took place, refer to the generating station name or location and be signed by the testing engineer. If any tests could not be completed by the DNO on the commissioning date, the operator should explain why this was the case.

Compliance

Ofgem has an ongoing duty as RO scheme administrator to monitor compliance with the RO Orders by operators of generating stations. This ensures that only eligible stations continue to receive support under the RO scheme. Ofgem monitors compliance of scheme participants in a number of ways, including on occasion through an audit programme as highlighted in the generating station's accreditation letter. An audit can be conducted at any point throughout a generating station's accreditation lifespan and so any commissioning documents and/or evidence can be requested at anytime by Ofgem and so should be retained by the operator. As outlined in the accreditation conditions, it is the operator's responsibility to meet any other evidential requirements and conditions that may be applicable in individual circumstances (this might be dependent on the type of generating station). Please note that it is the operator's responsibility to retain and provide evidence upon request regardless of when they assumed responsibility for a generating station. This includes circumstances where a generating station has been acquired post commissioning.

For further information of Ofgem's investigations into stations that have been identified as non-compliant during an audit, please review paragraphs 3.15 to 3.26 of the RO Guidance for generators.

Establishing the commissioned date

The operator should provide a full and clear timeline of events leading up to the first generation, and evidence that the standard tests and procedures were completed for that type of generating station including all electrical equipment connecting the generating station to the grid or load.

The operator should start by producing a timeline of the dates that key commissioning tests and procedures were completed - similar to the one below.

TIP 2: Operators of a generating station should remember to include the date that the station first started generating electricity.

Example timeline for a solar PV station

| Date | Commissioning Test | Evidence |
|----------------|---------------------------|---------------------------------|
| 01 July 2014 | DC string test | Documents 4a to 4g 'DC tests' |
| 2 July 2014 | AC cable tests | Document 7 'AC tests' |
| 15 August 2014 | Earthing test | Document 3 'Earthing' |
| 20 August 2014 | G59 test | Document 1 'G59 test' |
| 21 August 2014 | First generation | Document 5 'HH Data' |
| 28 August 2014 | Inverter commissioning | Document 6 'Inverters' |
| 28 August 2014 | Commissioning certificate | Document 2 'Commissioning Cert' |

This clearly shows the dates relevant tests were completed, at what point the station began generating electricity and – importantly – the documentary evidence that supports this.

TIP 3: Operators should remember to gather the commissioned and TIC documents discussed below:

- An explanation as to why the commissioning date is **/**/**** with a brief timeline of the tests and procedures before this date.
- A copy of a G59 test signed by the witnessing Distribution Network Operator (DNO) or a letter or email from the DNO stating that it did not wish to witness the test.
- If a generating station is off grid, the operator should submit an off-grid declaration and an Independent Technical Assurance Report (ITAR).

- A signed declaration from the installer or commissioning engineer confirming the date that the generating station commissioned.
- A signed statement from the installer or manufacturer of the generating equipment confirming the TIC and DNC of the generating station.
- Half hourly (HH) meter readings showing first generation.

Contact us

Please email any queries about our functions, or a station that is accredited, or pending accreditation under the scheme to: Renewable.Enquiry@ofgem.gov.uk. Please state the nature of your query and the station name in the subject line of the email.

For telephone enquiries, the team can be contacted on 020 7901 7310 during office hours.

Please note that we can only provide guidance on the legislation currently in place. Any queries regarding future changes to the Orders or wider energy policy should be directed to DESNZ, the Scottish Government or DfE as appropriate. Contact details can be found at <http://www.gov.uk/DESNZ>, www.scotland.gov.uk and www.economy-ni.gov.uk respectively.