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25th March 2015

Email: CCLandREGO@ofgem.gov.uk

Dear Paul,

Proposed changes to the recognition process for EU Guarantees of Origin for GB Fuel Mix Disclosure

I am replying on behalf of ScottishPower to the above proposal issued by Ofgem on 25 February 2015. Having considered the proposed changes, we would suggest that the interaction between the Guarantees of Origin (GoO) recognition process for the purposes of Fuel Mix Disclosure (FMD) and the validation of exempt supplies under Feed in Tariff (FiT) and Contracts for Difference (CFD) schemes requires some clarification.

Given that GoOs recognised by Ofgem may be used as evidence to support a reduction in supply volumes associated with the FiT and CfD schemes, and the timescales for claiming such reductions are later than the FMD deadline of 1 July, please can you clarify if you would still recognise/validate EU GoO claims submitted by suppliers after 1 July?

We acknowledge that Ofgem has an urgent need to revise the process for recognition of GoOs and that a spreadsheet based approach may be the most practicable solution in the time available, but we believe that it would be more sustainable in the long-term if a solution based on Ofgem's Renewable & CHP IT system were to be implemented.

Thank you for the opportunity to provide comment on the proposed changes to this process.

Yours sincerely,

John Dallimore
Environmental Markets Manager

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