

CCL and REGO Policy Development Manager  
Ofgem  
By email

3<sup>rd</sup> March 2016

Dear CCL and REGO Team,

**Consultation on proof of UK consumption of overseas electricity – 12<sup>th</sup> January 2016**

Please find below our responses to the questions raised in this consultation.

*Question 1: Do you agree that the types of evidence we have identified are adequate? Do you foresee any problems with obtaining them, particularly if the power has been exchanged multiple times?*

*Question 2: Are you aware of other specific types of evidence that they might present for these purposes? If so, what are they? Please be as specific as possible, and explain why you think this specific type of evidence would be adequate.*

We agree that the types of evidence identified are good examples of evidence that could be presented. As per our response to the previous consultation, in 2015\_16 our renewable power purchasing supply chain encompassed over 50 trading intermediaries and over 500 different generator organisations – so it would not be feasible to collect and present evidence from the entire contractual chain.

*Question 3: Are you aware of any issues that may preclude applying the decisions of the consultation on LECs and market coupling to proof of GB supply of overseas electricity under FMD, FIT and CFD as well? If so, please provide details on the issues you foresee.*

No. We do not believe there are any issues that would preclude applying the decisions of the consultation on LECs and market coupling to proof of GB supply of overseas electricity under FMD, FIT and CFD as well.

*Question 4: Can you foresee any issues that may arise from maintaining the same process for LECs as per the 2008 CCL guidance? If so, please give details.*

No.

*Question 5: Can you foresee any issues that may arise from maintaining the same process for GoOs as per the GoO recognition process currently being consulted on now implicit trades are permitted? If so, please provide details.*

No.

If you would like to discuss this further please feel free to contact me.

Yours sincerely,

Gemma Newsham  
Head of Regulations