



Making a positive difference
for energy consumers

All interested parties in relation
to the Renewables Obligation
Annual Report

Email: REDevelopment@ofgem.gov.uk

Date: 08 October 2020

Dear Stakeholder,

Consultation seeking views on proposed changes to the format of the Renewables Obligation (RO) Annual Report

We are writing to inform you that we are seeking views on changes we propose to make to the Renewables Obligation (RO) Annual Report for the 2019-20 report onwards. This consultation is open for a 4-week comment period. The proposals are provided in annex 1 to this letter.

We invite stakeholders to provide feedback on the proposed changes. The closing date for providing comment is 6 November 2020.

Why have we published this consultation?

The Renewables Obligation Orders¹ require us to produce an annual report on the scheme by 1 April following the end of an obligation period. Much of the information we publish in the RO Annual Report is required under the Renewables Obligation Order (ROO) as part of our statutory functions. We have, up until now, provided additional information to aid stakeholders understanding as the deployment of stations grew. Given the RO is closed to new stations, we believe it is an opportune time to review this document.

¹ Renewables Obligation Order Article 86(1)(f), Renewables Obligation Scotland Article 57(1)(f) and Northern Ireland Renewables Obligation Article 49(1)(e)

In this consultation, we propose a number of changes to the RO annual report with a view to reducing the document length and the cost of production. The key information that we propose removing remains publically available through our website and will be sign-posted.

Input requested

We provide three key documents in the Annexes attached to this letter describing the changes and demonstrating how the proposed changes would have impacted the 2018/19 annual report:

1. Annex 1 contains a summary of the proposed changes.
2. Annex 2 provides a copy of the 2018/19 annual report identifying the intended changes in track changes and including a commentary of the proposed changes.
3. Annex 3 provides a mock-up of how the 2018/19 annual report would have looked if the proposed changes were made.

The purpose of the 4-week comment period is to gain your feedback on the changes proposed to the RO annual report. When providing comment please consider the following questions:

Question 1: Do you agree with the changes outlined in Annex 1?

Question 2: Are there any other improvements that you think we could be make to the report? If so, please explain why the change is needed and the benefits?

How to respond

Responses should be marked 'Renewables Obligation (RO) Annual Report consultation response' and sent to: REDevelopment@ofgem.gov.uk

If you would like to discuss the proposals ahead of sending your response, please email: REDevelopment@ofgem.gov.uk.

Please be aware that this is not a consultation on the information required to form part of the Annual Report as required under the Renewables Obligation Order, but on the format and information contained within the published 'RO annual report'.

Next steps

Once we have considered the responses to this consultation we will publish a brief decision and make the proposed changes as part of the 2019/20 annual report, due for publication by 1 April 2021.

Yours sincerely,

RO Policy Team

Annex 1 – Summary of the proposed changes

Note – all table and diagram references relate to the 2018/19 RO annual report - mock-up versions can be found in Annexes 2 and 3

Chapter	Proposal	Change detail	Comments
ROCs issued and renewable generation (Chapter 2)	Substantial change	We propose removing the following items plus their associated commentary: <ul style="list-style-type: none"> - all information in the 'Issuing ROCs' section where we describe how ROCs are issued. - Table 2.2 'Average number of ROCs issued per MWh of generation since the introduction of banding' - Figure 2.4 'Monthly ROC Issue for Drax in 2016-17 to 2018-19' - Figure 2.5 'Average wind load factors by month for 2014-15 to 2018-19' - Figure 2.6 'ROCs issued each month in 2018-19 by technology' - Figure 2.7 'ROCs issued and renewable generation in England by technology type for 2018-19' - Figure 2.8 'ROCs issued and renewable generation in Wales by technology type for 2018-19' - Figure 2.9 'ROCs issued and renewable generation in Scotland by technology type for 2018-19' 	These changes reduce this section from 10 to 3 pages compared to the published 2018/19 annual report. Detailed information, such as ROC issue, accreditation and country specific data, will continue to be accessible from our website: https://www.ofgem.gov.uk/environmental-programmes/ro/contacts-publications-and-data/public-reports-and-data-ro . This link will also be included in the report to support accessing the data.

Chapter	Proposal	Change detail	Comments
		<ul style="list-style-type: none"> - Figure 2.10 'ROCs issued and renewable generation in Northern Ireland by technology type for 2018-19' - Figure 2.11 'ROCs saved from monthly validation checks by source' <p>We propose reducing the 'Monthly ROC validation' section.</p> <p>We also propose moving the information held in appendix 1 and 3 into this Chapter:</p> <ul style="list-style-type: none"> - Appendix 1 - Table A1.1: ROCs issued during 2018-19 by country and technology 	
Biomass sustainability (Chapter 3)	Substantial change	<p>We propose reducing the chapter summary and paragraphs 3.1-3.8. These paragraphs largely contain background detail on the sustainability requirements that are accessible from our website. The section will be reduced and links to the relevant sections of our website for more detail will be included.</p> <p>We propose changing the structure of Chapter 3 to group the information into three main sub-headings:</p> <ul style="list-style-type: none"> - Sustainability Criteria, - Feedstock/fuel types, and - Country of origin 	<p>These changes aim to bring greater clarity to the chapter, to reduce replication of very similar charts and ensure the details of each chart is clearly visible.</p> <p>Detailed information will continue to be accessible from the annual biomass sustainability datasets available from our website: https://www.ofgem.gov.uk/environmental-</p>

Chapter	Proposal	Change detail	Comments
		<p>Under these sub-headings we propose to combine a number of the charts:</p> <ul style="list-style-type: none"> - Figure 3.1, 3.4 and 3.7 could be replaced with one combined chart focused on the past 4 years only plus brief commentary. - Table 3.1, 3.3, 3.4 and 3.5 could be combined - Figure 3.2 and 3.3 could be combined - Figure 3.5 and 3.6 could be combined 	<p>programmes/ro/applicants/biomass-sustainability. This link will also be included in the report to support data access.</p>
<p>Audit and participant compliance (Chapter 5)</p>	<p>Minor change</p>	<p>We propose shortening the introductory text and including information on the type of compliance action that has been taken against scheme participants.</p>	<p>These changes aim to bring greater clarity to the chapter and to provide more end-to-end detail of our audit and compliance programme.</p>
<p>Generators accredited under the RO (Chapter 6)</p>	<p>Substantial change</p>	<p>We propose removing the following items and their associated commentary:</p> <ul style="list-style-type: none"> - Paragraphs 6.1 and 6.2 – background and introductory text - ‘Closure of the RO scheme’ section including all associated tables. - ‘Stations accredited from the start of the scheme to the end of 2018-19’ section including figure 6.1 ‘Top 	<p>These changes reduce this section from 13 to 4 pages compared to the published 2018/19 annual report.</p> <p>Accreditation activity is ongoing, despite scheme closure in 2017. The number of accreditations, however, are now low and falling.</p>

Chapter	Proposal	Change detail	Comments
		<p>three renewable technologies by number of accreditations and capacity at the end of 2018-19'</p> <ul style="list-style-type: none"> - The 'Capacity amendments' section - The 'Off-Grid and Zero-Export generating stations' section - The 'NFFO generating stations' section <p>We propose moving the section 'Determining fuelled stations capacities' (paragraph 6.4 of the 2018/19 report) and adding as a new appendix.</p> <p>We propose changing the 'Generators accredited in 2018-19' section to discuss all accreditations under the RO as well as the current year's accreditations. 'Table A3.1 – Accreditation and capacity of renewable technologies across the UK at the end of 2018-19' from Appendix 3 will move into Chapter 6 'Generators accredited under the RO'.</p> <p>We also propose removing much of the commentary in the 'Capacity of accredited stations' section but retaining figures 6.5, 6.6 and 6.7.'</p>	<p>Information on accreditations will continue to be accessible from our website:</p> <p>https://www.ofgem.gov.uk/environmental-programmes/ro/contacts-publications-and-data/public-reports-and-data-ro. This link will also be included in the report to support data access.</p>

Chapter	Proposal	Change detail	Comments
Appendix 1: Determining fuelled station capacities	New	This information will be moved from the 'Generators accredited under the RO' section in Chapter 6.	
(OLD) Appendix 1: ROCs Issued	Removed	We propose moving 'Table A1.1: ROCs issued during 2018-19 by country and technology' into Chapter 2 'ROCs issued and renewable generation'.	
Appendix 3: Accredited stations	Substantial change	<p>We propose moving 'Table A3.1 – Accreditation and capacity of renewable technologies across the UK at the end of 2018-19' into Chapter 6 'Generators accredited under the RO'.</p> <p>We also propose removing the following tables where their associated charts and commentary are removed from Chapter 2:</p> <p>Number of generating stations with accreditations effective 2015-16 to 2018-19</p> <p>Capacity of generators accredited by obligation year and 2014-15 (MW)</p> <p>Number of off grid and zero export stations by country and technology accredited to the end of October 2019</p>	<p>Information on accreditations will continue to be accessible from our website:</p> <p>https://www.ofgem.gov.uk/environmental-programmes/ro/contacts-publications-and-data/public-reports-and-data-ro. This link will also be included in the report to support data access.</p>

Chapter	Proposal	Change detail	Comments
		capacity of off grid and zero export generating stations by generation technology accredited to the end of October 2019	