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Dear Stakeholder

Renewables Obligation (RO): Fuel measurement and sampling (FMS) process and sustainability

In May 2013 we published a revised version of the Renewables Obligation: Fuel Measurement and Sampling (FMS) guidance document¹. This document specified that the FMS process will be used to support the agreement of suitable procedures for the issue of Renewables Obligation Certificates (ROCs) as well as the RO sustainability reporting requirements. As a result, we have made updates to the FMS questionnaires and templates for generating stations using bioliquid fuels to ensure that operators of electricity generating stations consider the monthly sustainability reporting requirements when proposing their FMS procedures to Ofgem.

Reporting by consignment

As part of the FMS process we will ask the operator to consider whether they are using multiple consignments of bioliquid and whether there is any mixing of these consignments at the generating station or further up in the supply chain. Where bioliquid consignments have been mixed, the Renewables Obligation Order 2009 (as amended) specifies that a mass balance system must be used when withdrawing an amount of bioliquid from the mixed consignments². We will work with operators of generating stations using bioliquids to agree procedures which will allow the operator to determine accurate and reliable mass and gross calorific values for each consignment used in a month.

Fuel classification

Under the provisions of the legislation, stations using bioliquids to generate electricity must demonstrate compliance with the RO sustainability criteria to be issued ROCs. This information is provided to Ofgem as part of the generating station's monthly output data submission via the Renewables and CHP Register. There are some exemptions to sustainability reporting available based on whether the fuel is considered a waste or a type of residue. The Renewables Obligation Order 2009 (as amended) specifies that no ROCs are to be issued in respect of electricity unless the operator has demonstrated to Ofgem's satisfaction that the bioliquid meets the sustainability criteria³.

To facilitate this, when an operator submits their FMS documentation they will need to consider the fuel classification for their bioliquid and whether it is catered for in the common classification tables in Appendix 2 of the Ofgem Sustainability Criteria for

¹ Available on Ofgem website here:
<http://www.ofgem.gov.uk/Sustainability/Environment/RenewablOb/FuelledStations/Documents1/Fuel%20Measurement%20and%20Sampling%20Guidance.pdf>

² Article 22A of the RO and ROS, and Article 21A of the NIRO.

³ See footnote 2

Bioliquids guidance document⁴. Where the operator considers the fuel to be a waste or residue which is not covered in the common classification tables, we will request that the operator provides evidence to satisfy us that they are applying a relevant fuel classification and therefore the correct exemptions. In the same manner as the broader FMS process, this agreement will be based on the evidence provided by the operator to us. Fuel classification will still be subject to scrutiny by an independent auditor as part of the Annual Bioliqid Sustainability Audit Report process.

Should you have queries related to FMS or Sustainability please contact me using the details above.

Kind Regards,

Amy Ling
Manager – Biomass Sustainability

⁴ Available on Ofgem website here: <http://www.ofgem.gov.uk/Sustainability/Environment/RenewablObl/FuelledStations/ro-sustainability/Documents1/Sustainability%20Criteria%20for%20Bioliquids%2019%2012%202011.pdf>