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Guidance Document 1 – Producer User Guide

Guidance for GGCS users operating a Gas Producer Account

Version 2.0

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1. SUMMARY

The GGCS Registration Database is now running on Grexel's G-REX platform. There is a wide range of new functionality available to you and some processes have been updated.

Using your GGCS Producer account you will be able to:

- Make Production Declarations, informing GGCS about the biomethane you have produced.
- Be issued with Renewable Gas Guarantees of Origin (RGGOs) based on those Production Declarations.
- Transfer RGGOs to other GGCS Producers and Traders.
- Receive RGGOs into your account from other GGCS Producers and Traders¹.
- Cancel RGGOs and allocate them to End-Use Consumers².

Your Production Declarations will generally be aligned with the Non-Domestic Renewable Heat Incentive (NDRHI) or Green Gas Support Scheme (GGSS), which means that you will register your gas on the GGCS system on a quarterly basis in line with your NDRHI or GGSS accreditation. Standard practice is to register the volume of gas for which you have received NDRHI or GGSS payments (i.e. your Eligible Heat Output (EHO) figure).

You are responsible for the accuracy of your Production Declarations, and transfer and cancellation requests³.

RGGOs will expire three years and three months from when the gas production period they relate to ends.⁴

NB: all account users must be familiar with the details of this guidance document.

Please contact the GGCS team at any point if you would like clarification on anything in this document – we can be reached at info@greengas.org.uk.

¹ Previously you could only send RGGOs to other accounts and not receive them.

² We are now referring to RGGOs as being 'Cancelled' rather than 'Retired'. It is the same process and does not mean that they are removed from the system, only that they have been allocated to a consumer and cannot be traded further. Cancellation incurs a fee which is detailed on our website.

³ Clause 4.4. of your letter agreement – "The Producer shall be responsible for all Production Declarations....for the avoidance of doubt, the Scheme Administrator shall be under no obligation to consider or review the accuracy or completeness of any such declaration or request nor verify that such declaration or request has been made by the Producer and not a third party nor shall the Scheme Administrator be liable for any losses arising from any inaccuracy or incompleteness of such declaration or request nor any losses resulting from the fraudulent use of the Producer's Producer Account arising as a result of an act or omission of the Producer".

⁴ This is a change from the previous Registration Database which calculated expiry from the first of the month in which the injection period ended. So for any injection that ends on the second day of the month or later, the expiry date will be up to 30 days later than before.

2. RGGO ISSUING PROCESS

Before you begin this process, you must have provided the GGCS with your most recent Fuel Measurement and Sampling Questionnaire (FMSQ) summarising the fuel classifications of your feedstocks agreed with Ofgem.

If your plant has been operating for more than one year, you must also provide your:

- NDRHI Annual Sustainability Report (ASR) or GGSS Annual Sustainability Audit Report (ASAR).⁵
- GGCS Data Verification Statement (DVS).⁶
- Annual Feedstock Declaration (often shortened to AFD).⁷

2.1 Completing a Production Declaration

The Scheme Administrator will have provided you with a template Production Declaration in the form of an Excel file. Each plant will have a unique template. If you manage multiple sites, you must ensure you are using the correct template for each site. You will upload this Excel file to the **Documents** section of your GGCS account. The template contains details of the evidence we require which includes:

- Evidence from the NDRHI or GGSS register of the relevant NDRHI or GGSS payment, of feedstocks used, and of your Eligible Heat Output (EHO).
- Evidence of your feedstock use from your Ricardo, NNFFCC, or Ofgem GHG and apportionment calculators.
- Evidence from your Voluntary Scheme certification if you wish to add that information to your RGGOs.

NB: if you have not yet received a Production Declaration template for your plant, please contact the Scheme Administrator on info@greengas.org.uk.

⁵ By providing a copy of this report you are giving the GGCS assurance that the author of the report has given you permission to share it with us, and for us to use it for the purposes of verifying the data you have submitted to the GGCS.

⁶ A GGCS DVS must be provided annually usually covering the same reporting period of gas production as your NDRHI ASR or GGSS ASAR. It must be provided to the GGCS within three months of the end of the verified period.

⁷ Annual Feedstock Declarations (AFDs) are provided to Ofgem as evidence of the percentage of gas production that has come from product/co-product feedstocks vs residues/wastes and is used to determine whether NDRHI or GGSS payments will need to be recovered at a future date.

2.2 Uploading a Production Declaration

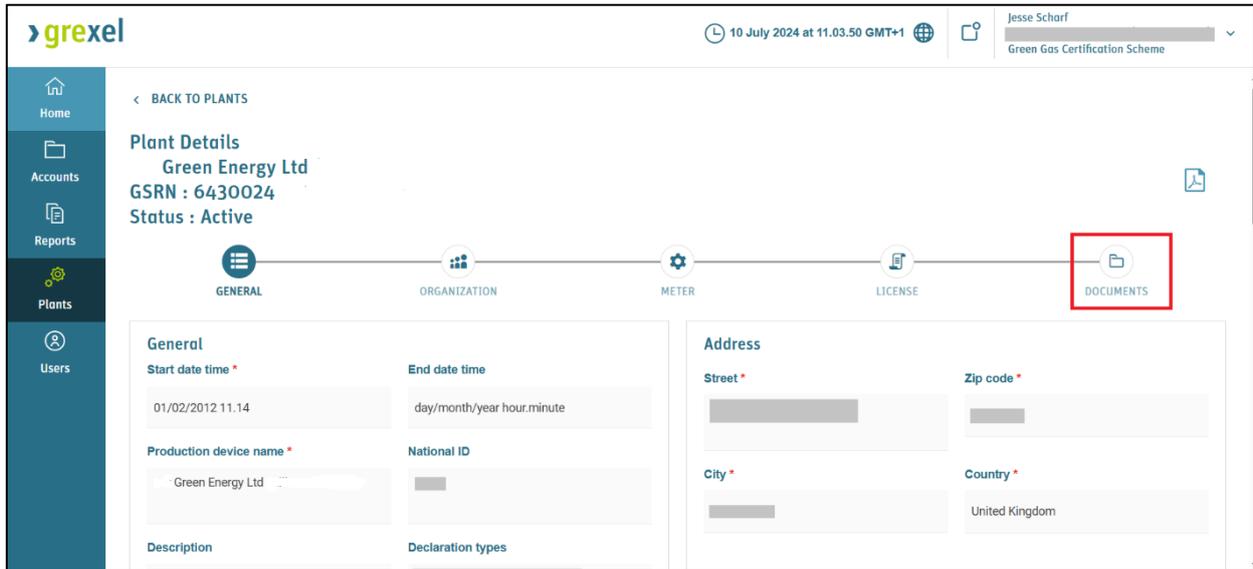
Log into your account on G-REX: [G-REX \(grexel.com\)](https://grexel.com) (see following sections of this guidance on navigating G-REX).

Select Plants from the left hand side bar. Then select the plant you wish to upload a Production Declaration for.

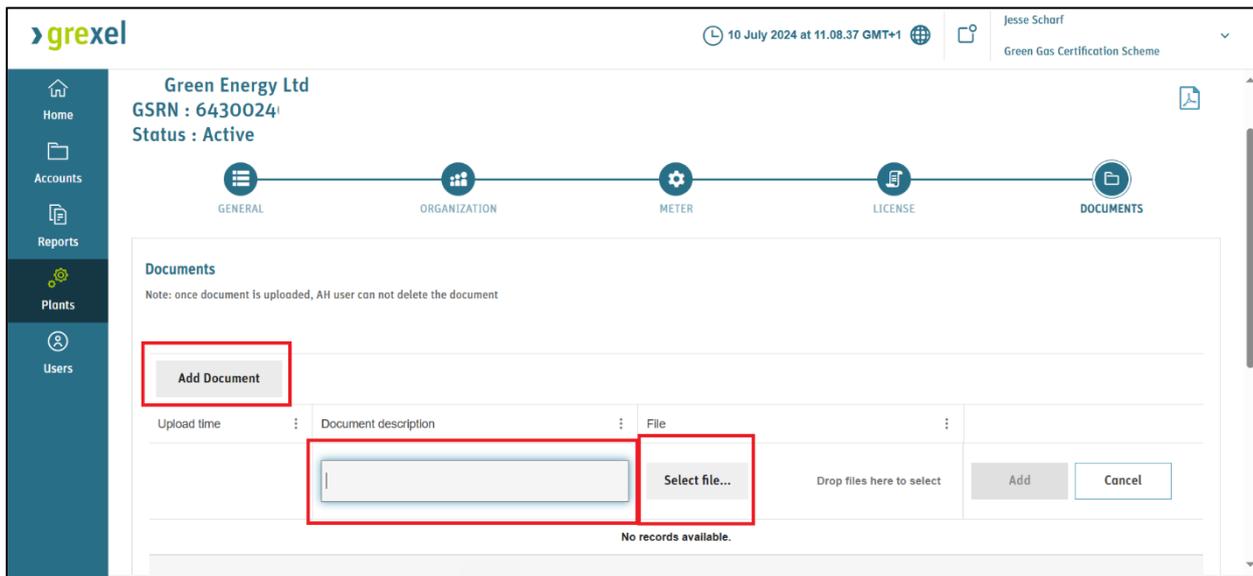
The screenshot displays the G-REX interface. On the left is a dark teal sidebar with navigation icons and labels: Home (house icon), Reports (document icon), Plants (gears icon, highlighted with a red box), Users (person icon), Organizations (gears icon), and Issuing (document with arrow icon). The main content area is titled 'Plants' and contains a table with three columns: Name, GSRN, and Status. The table has three rows. The first row is a header with 'Name ↑1', 'GSRN', and 'Status ↑2', each with a three-dot menu icon. The second row contains 'Grexel Test' (highlighted with a red box), '643002406493031199', and 'Active'. The third row contains 'Grexel Test 17092024', '643002406493031212', and 'Active'.

Name ↑1	GSRN	Status ↑2
Grexel Test	643002406493031199	Active
Grexel Test 17092024	643002406493031212	Active

Once you are in the **Plant Details** menu, select **Documents** from the right hand side of the menu.



Select **Add Document**.



Copy the Production Declaration file name into the **Document Description** field. The format of the file name should be;

- [Plant Name] [Month] to [Month] [Year] Production Declaration [Version]
- E.g. Green Energy Ltd Jan to Mar 2024 Production Declaration v1.0

Select the file to upload and click **Add**.

Upload time	Document description *	File *
	Test Production Declaration Template v1.0	<input type="button" value="Select file..."/> Drop files here to select G-REX Test Spreadsheet.xlsx 6.04 KB

This will complete the upload process and you will see the time of the upload, the Document Description you have provided and the name of the File uploaded in a table. The most recently uploaded document appears last.

Upload time	Document description *	File *
25.04.2025 17:05	GGCS Production Declaration Template -multi energy source v1.61 - with API.xlsx 1.45 MB	GGCS Production Declaration Template -multi energy source v1.61 - with API.xlsx

Upon adding a document, the Status field of the plant will change to **Updated** and **Submit** and **Delete** buttons will appear at the top right of the page.

NB: If you attempt to click these, you will be greeted by an error notification. This is because the actions must be carried out by the Scheme Administrator. It is a known quirk of G-REX and we are investigating whether these buttons can be hidden for non-Scheme Administrator accounts.

After the upload, please also note that the plant list will show two entries for the plant ("Active" and "Updated"). This is the way that G-REX processes document uploads. Once the Scheme Administrator reviews the uploaded Production Declaration and accepts the change, G-REX will merge them into a single "Active" entry once again.

Plant Details
Grexel Test
GSRN : 643002406493031199
Status : Updated

Submit Delete

GENERAL ORGANIZATION METER LICENSE DOCUMENTS

Upload time	Document description *	File *
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You can revisit this page at any time to upload new versions or download copies of the files already uploaded. The Scheme Administrator can delete unwanted files upon request e.g. if you upload the wrong file or are required to upload an updated version of your Production Declaration, the Scheme Administrator can delete the previous version.

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2.3 GGCS Administrators will process your Production Declaration

We run a report each day that shows which plants have uploaded a Production Declaration.

We aim to process your declaration within three working days, but at busy times it may take longer. Please contact the Scheme Administrator if you have a date by which you are expecting to be able to transfer your RGGOs to a counterparty, or cancel them.

If the Production Declaration has been completed to our satisfaction, the RGGOs will be issued into your account and be available for you to transfer or cancel. You will not receive an email notification⁸.

If we require further information, or, you have failed to provide supporting documents e.g. your most recent DVS, we will email you with a request for further information. You may need to resubmit your Production Declaration.

⁸ The previous IT system provided email notifications of this action.

3. DATA LABELS WITHIN A RGGO BUNDLE

When completing a Production Declaration, you must provide evidence that supports the data labels that will make up your RGGOs. Some of these fields are optional and are marked as such below. Detailed instructions are provided within the Production Declaration template and an introduction to the labels and any support calculations is provided below.

Data Label	Description
Volume (kWh)	<p>This value will either match:</p> <ul style="list-style-type: none"> - Your eligible heat output under the NDRHI or GGSS. - The portion of the Eligible Heat Output (EHO) apportioned to the Energy Source being declared e.g. kWh from waste, residue or product. - Your EHO figure, as adjusted for corrections or deductions. If it has been adjusted, these adjustments must be described in your Production Declaration. - A portion of your EHO attributed to one part of your quarterly production (see section on split batches for more information)
Energy Source⁹	<p>The Energy Source is the biomass feedstock used to generate the biomethane (previously referred to as the “Biomass Information” label). The labels are:</p> <ul style="list-style-type: none"> - GGCS01 - Biomass (Unspecified) Classification (Product/Co-Product) - GGCS02 - Biomass (Unspecified) Classification (Residue) - GGCS03 - Biomass (Unspecified) Classification (Waste) - GGCS05 - Biomass (Unspecified) Classification (Mixed) <p>The “Classification” field is the classification of your feedstock, according to your NDRHI or GGSS FMSQ as a Waste, Residue, or Product/Co-Product.</p> <p>If all of your feedstocks fall into one classification, then you will register all your gas against one “Energy Source” label. For example, you use maize and rye feedstocks which are both classified as Products. You therefore register all of your gas each quarter under “GGCS01 - Biomass (Unspecified) Classification (Product/Co-Product)”.</p>

⁹ Previously called the “Biomass Information” label.

Data Label	Description
	If your feedstocks fall into more than one classification, then refer to section 6 for guidance on how to register your gas injection against two or three “energy source” labels.
Production Support Description	If you have received or expect to receive a payment under the NDRHI or GGSS, then your RGGOs will be labelled as Production Support “Yes” with a reference to the type of Production Support e.g. GGSS or NDRHI.
Production Start Date	<p>Production start and end dates will match your NDRHI or GGSS accreditation and not the actual dates of your meter readings. We recognise that meter readings can vary +/- 3 days from your accredited injection periods.</p> <p>See the section of this guidance on split batches for more information on labelling RGGOs with start and end dates related to calendar periods.</p>
Production End Date	<p>Production start and end dates will match your NDRHI or GGSS accreditation and not the actual dates of your meter readings. We recognise that meter readings can vary +/- 3 days from your accredited injection periods.</p> <p>See the section of this guidance on split batches for more information on labelling RGGOs with start and end dates related to calendar periods.</p>
Subsidy or other criteria met	<p>This label shows which quality criteria the biomethane production has met (where those criteria are not part of a Voluntary Scheme e.g. ISCC). You will be able to select one or more of the following options. Please contact us if your biomethane has met an unlisted quality criterion.</p> <ul style="list-style-type: none"> - Green Gas Support Scheme (UK) - Non-Domestic Renewable Heat Incentive (UK) - Renewable Transport Fuel Obligation (UK) - naturemade (CH) - Unspecified
GHG Threshold Met	<p>Certain quality criteria will include a GHG threshold which must be met, and this information will be added to the RGGO. Only the numerical value is shown in this data field (the name of the quality criteria it relates to is added here for information).</p> <ul style="list-style-type: none"> - < 86.4 (GGCS) - < 118.44 (RTFO – post 05/10/2015 production sites) - < 125.28 (NDRHI)

Data Label	Description
	- < 152.28 (RTFO – pre 05/10/2015 production sites)
Manure Credit Applied	<p>When calculating GHG values within the GGSS or the RTFO, you apply a negative value for any manure used.</p> <p>This label will be “unspecified” by default. If you choose to provide an actual GHG value in the “GHG Emission Produced” label, then you must declare if you have used a Manure Credit in the calculation.</p>
Carbon Capture Credit Applied	<p>When calculating GHG values within the NDRHI, GGSS, or the RTFO you apply a negative value for any carbon dioxide captured and removed from site.</p> <p>The label will be “unspecified” by default. If you choose to provide an actual GHG value in the “GHG Emission Produced” label, then you must declare if you have used a Carbon Capture credit in the calculation.</p>
GHG Emission Produced	<p><i>Optional Label</i></p> <p>If you wish to record the actual GHG value you can do so here. Your calculations must be shown in the Production Declaration and evidence must be provided either from a DVS, ASR, or bespoke report.</p>
Sustainability Scheme	<p><i>Optional Label</i></p> <p>If you are certified under a Voluntary Scheme you can specify which one here. The current options are:</p> <p>ISCC-EU ISCC-Plus REDcert Better Biomass</p>

Data Label	Description
Sustainability Scheme Certification Start Date	<p><i>Optional Label</i></p> <p>If you record you are certified under a Voluntary Scheme, you must provide the start and end dates of your annual certification and provide evidence in your Production Declaration.</p>
Sustainability Scheme Certification End Date	<p><i>Optional Label</i></p> <p>If you record you are certified under a Voluntary Scheme, you must provide the start and end dates of your annual certification and provide evidence of this in your Production Declaration.</p>
Unique Number of Linked Proof of Sustainability (PoS)	<p><i>Optional Label</i></p> <p>You can record the unique number of a Proof of Sustainability (PoS) certificate issued under your Voluntary Scheme certification which represents the same biomethane as the RGGOs.</p> <p>GGCS members must consult with their Voluntary Scheme auditor/certification body before using this feature.</p>
Link to Proof of Sustainability (PoS)	<p><i>Optional Label</i></p> <p>You can provide a URL which will direct to an online version of a Proof of Sustainability (PoS) certificate issued under your Voluntary Scheme certification which represents the same biomethane as the RGGOs.</p> <p>GGCS participants will arrange their own file storage and hosting system and are responsible for the confidentiality and data security of that file.</p> <p>GGCS participants must consult with their Voluntary Scheme auditor/certification before using this feature.</p> <p>For further information, please refer to section 6.</p>

4. ADDING ISCC LABELS TO RGGOS

4.1 The G-REX platform

The G-REX platform includes the potential to add information about Voluntary Scheme activity to RGGOs. As ISCC is the only Voluntary Scheme in use by UK producers, we refer to it specifically instead of Voluntary Schemes in general.

This is an evolving area which we think can add value to the use of RGGOs; however, consultation with ISCC Certification Bodies is needed.

NB: do not include PoS information on the RGGO itself unless your counterparty has specifically requested it. If they have, then please read on in full. After which, contact us if you have any outstanding questions.

***NB: The annual ISCC certificate must cover the full quarter e.g. if your bundle is from 3rd March 2025 to 2nd June 2025 but your ISCC dates run from 25th May 2024 to 24th May 2025, then you must include two annual certificates to cover the full quarter, with the start and end date being 25th May 2024 to 24th May 2026.**

4.2 Option A – Certification data only – No PoS info

Labels Included in RGGO	Not included in RGGO
Sustainability scheme - e.g. ISCC-EU	Unique number of linked Proof of Sustainability
Sustainability scheme certification start date - e.g. 01/01/2024	Link to Proof of Sustainability (i.e. the URL of the PoS after it has been uploaded to a file sharing service such as OneDrive or Dropbox)
Sustainability scheme certification end date - e.g. 31/12/2024	
Evidence needed	
Evidence of ISCC certification being: - Screenshot of an annual certificate (or certificates) covering the full date range of the production period	
PDF of the annual certificate embedded in the Excel GGCS Production Declaration template. Evidence that ISCC Certification Body has approved use of labels on RGGOs being: - An email exchange showing this guidance has been provided to the certification body and they have agreed to use of ISCC related labels	

Adding this label does not mean that a PoS is integrated into a RGGO. A PoS will need to be generated outside the GGCS system and the RGGO labels give no information on whether this has occurred.

4.3 Option B – Certification Info and PoS ID

Labels included in RGGO	Not included in RGGO
Sustainability scheme - e.g. ISCC-EU Sustainability scheme certification start date - e.g. 01/01/2024 Sustainability scheme certification end date - e.g. 31/12/2024 Unique number of linked Proof of Sustainability - e.g. EU00222-2328237	Link to Proof of Sustainability (i.e. the URL of the PoS after it has been uploaded to a file sharing service such as OneDrive or Dropbox)
Evidence needed	
Evidence of ISCC certification being: <ul style="list-style-type: none"> - Screenshot of an annual certificate (or certificates) covering the full date range of the production period - PDF of the annual certificate embedded in the Excel GGCS Production Declaration template. Evidence of PoS issued being: <ul style="list-style-type: none"> - Screenshot of PoS or PDF embedded in the Excel GGCS Production Declaration template. - ID must match input to RGGOs. Evidence that ISCC Certification Body has approved use of labels on RGGOS being: <ul style="list-style-type: none"> - An email exchange showing this guidance has been provided to the certification body and they have agreed to use of ISCC related labels. 	

Adding this label does not mean that the PoS is fully integrated into a RGGO. A PoS will be generated outside the GGCS system.

NB: this label is used at your own risk. The PoS ID is fixed and may not match PoS generated further down the chain of custody e.g. PoS from trader to trader.

4.4 Option C – All Labels used

Label Included in RGGO
<p>Sustainability scheme</p> <ul style="list-style-type: none">- e.g. ISCC-EU
<p>Sustainability scheme certification start date</p> <ul style="list-style-type: none">- e.g. 01/01/2024
<p>Sustainability scheme certification end date</p> <ul style="list-style-type: none">- e.g. 31/12/2024
<p>Unique number of linked Proof of Sustainability</p> <ul style="list-style-type: none">- e.g. EU00222-2328237
<p>Link to Proof of Sustainability: the URL of the PoS after it has been uploaded to a file sharing service such as OneDrive or Dropbox, which would usually be sent to the relevant counterparty.</p> <ul style="list-style-type: none">- E.g. www.dropbox.com/user/pos1084938
Evidence needed
<p>Evidence of ISCC certification being:</p> <ul style="list-style-type: none">- Screenshot of an annual certificate (or certificates) covering the full date range of the production period- PDF of the annual certificate embedded in the Excel GGCS Production Declaration template
<p>Evidence of PoS issued being:</p> <ul style="list-style-type: none">- Link to PoS must show PoS with ID matching input
<p>Evidence that ISCC Certification Body has approved use of labels on RGGOs being:</p> <ul style="list-style-type: none">- An email exchange showing this guidance has been provided to the certification body and they have agreed to use of ISCC related labels.

NB: adding these labels does not mean that the PoS is fully integrated into a RGGO. A PoS will be generated outside the GGCS system, but is linked via the ID and URL.

These labels are used at your own risk.

- The PoS ID on the RGGO is fixed and may not match PoS generated further down the chain of custody e.g. PoS sent from trader to trader. GGCS participants are solely responsible for any PoS generated and stored outside the GGCS Registration Database (G-REX).
- All parties receiving these RGGOs (which may include parties further to the first GGCS member you transfer the RGGOs to, and will also include End-Use Consumers receiving the Cancellation Statement, will be able to see this URL and use it to access the storage space it links to.

You must consider the following:

- will you, or your counterparties, need to upload different PoS to reflect the variety of senders and receivers along the chain?
- are there any data security issues from circulating this URL which may link to your company's document storage system?
- will sharing this document create confidentiality issues?
- will this URL remain valid for the time needed for your counterparties to access the PoS?

5. CALCULATING YOUR FEEDSTOCK-TO-GAS APPORTIONMENT

This section is only relevant if your feedstocks fall into two or three classifications. For example, you use maize which is classified as a product and farmyard manure which is classified as a waste. If all your feedstocks are part of the same classification, then you are not required to provide any “Feedstock-to-Gas” apportionment calculations.

In order to determine the percentage of your Eligible Heat Output (EHO) that should be registered with each Energy Source¹⁰ label, you should use established calculation methodologies contained within either a public or commercial product such as the Ricardo AD GHG calculator tool, the [NNFCC Biomethane and Biogas Carbon Calculator](#) or the [Ofgem Non-Domestic RHI Biogas and Biomethane Apportioning Tool](#). These should be the same calculations that you use to assess the GHG emissions of different feedstock consignments within your NDRHI or GGSS compliance regime.

If you are not claiming the NDRHI or the GGCS then you may use the calculation method within your Voluntary Scheme certification e.g. ISCC.

Below is a short description of the way each calculator can be used to apportion your feedstock use to biomethane production. The Production Declaration template provides more detailed instructions on how to enter this information.

¹⁰ Previously called the Biomass Information label.

5.1 Using the [Non-Domestic RHI, GGSS and FIT Biogas and Biomethane Apportioning Tool](#)

Column N shows the percentage contribution to your total biogas production from each feedstock. The Production Declaration gives a table where you can enter the % of each feedstock and label it as Product, Residue, or Waste. The template will then add together the percentage contributions of individual feedstocks to calculate the percentage totals for each Energy Source label.

NB: the total kWh of gas registered for each quarter across different Energy Source labels must match your EHO figure for that quarter.

The screenshot shows a Microsoft Excel spreadsheet titled "RHI FIT GGSS biogas and biomethane apportioning tool - View-only". The spreadsheet is used for apportioning biogas and biomethane production. It includes a header row (row 7) with the following columns: Measured Volume of biogas or biomethane (m³), Feedstock No., Feedstock Name as listed in Fuel Measurement and Sampling (FMS) Questionnaire, Feedstock Name in Default Data, Feedstock Consignment, Feedstock Categorisation, Dry or Wet?, Mass (tonnes), Moisture Content, Methane Yield / Tonne Volatile Solid (m³CH₄/TVS), Volume contribution of methane (m³CH₄), Percentage Contribution of biogas or biomethane, and Volume Contribution of biogas or biomethane (m³).

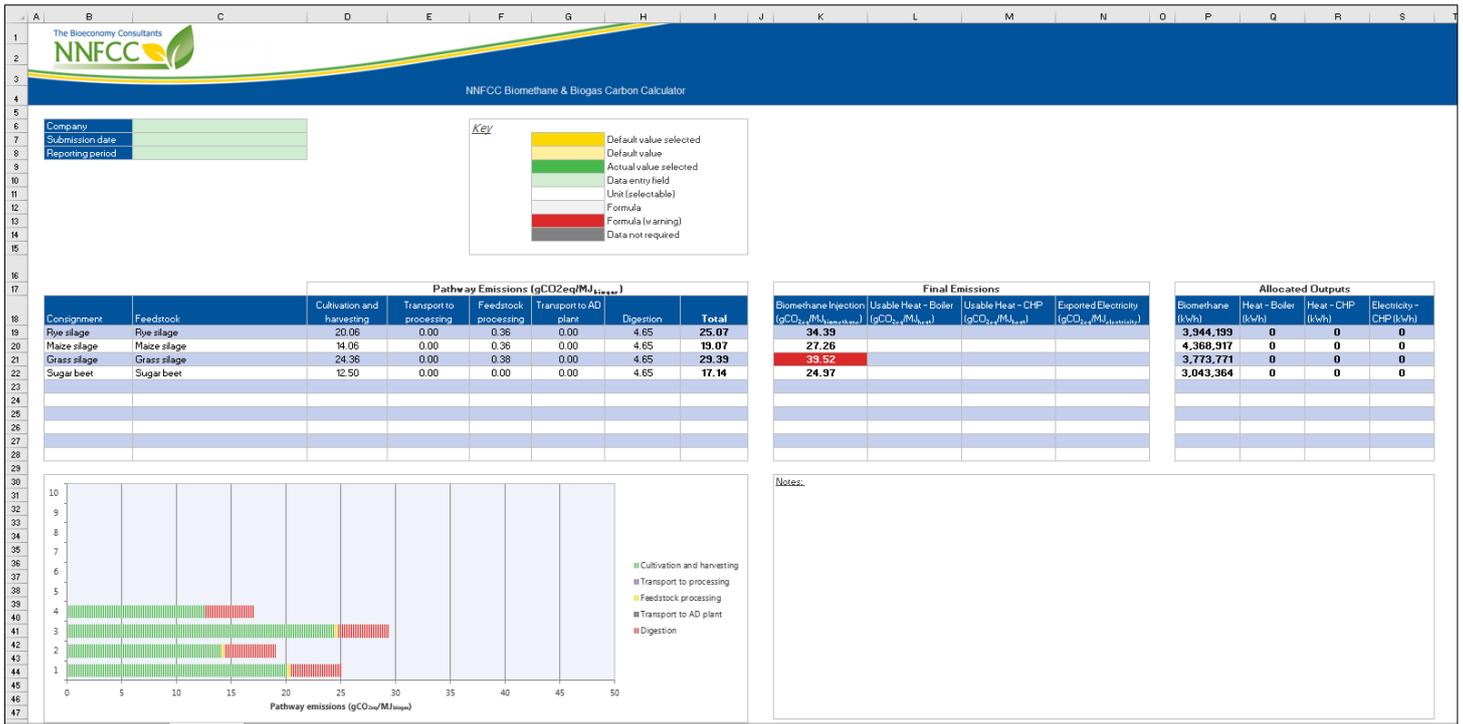
Below the header, there are three input fields for Installation name, Installation reference number(s), and Reporting Period. The main data table starts at row 9. The first row of data (row 9) shows a measured volume of 2000000 m³ for Feedstock 1, which is Household/domestic food waste, categorized as Animal by-products, Waste / Residue, Wet, with a mass of 100 tonnes and 86.00% moisture content. The methane yield is 207 m³CH₄/TVS, contributing 2898 m³CH₄ to the total, which is 33.33% of the total biogas production of 86666.67 m³.

Subsequent rows (10-21) show additional feedstocks and their contributions. For example, Feedstock 2 (Household/domestic food waste, Animal by-products, Product, Wet, 200 tonnes, 86.00% moisture) contributes 5796 m³CH₄ (66.67% of total). Feedstock 3 (Coffee, Animal by-products, Waste / Residue, Wet, 300 tonnes, 55.00% moisture) has a methane yield of "User to provide value".

5.2 Using the [NNFCC Biomethane and Biogas Carbon Calculator](#)

Column P (Biomethane kWh in the Allocated Outputs table) on the below worksheet shows the kWh of biomethane apportioned to each feedstock. As the calculator shows kWh figures (rather than m³) these can be used directly as the quantities of gas you register under each Energy Source label, as long as the total kWh of gas registered for each quarter across different fuel classifications matches your EHO figure for that quarter.

NB: you may need to combine the figures from several feedstocks to get the figure for each Energy Source label.



5.3 Using the Ricardo GHG Calculator

The standard Ricardo calculator provides a table titled “Information for Green Gas Certification Scheme” which collates the relevant information from the main table. You may provide a screenshot (example below) of this table and enter the kWh values given in “Estimate of actual biomethane injected from feedstock” into your Production Declaration.

NB: please ensure the total kWh adds up to the rounded down EHO provided in your Ofgem portal screenshot. If you find that the Ricardo tool value is higher, please deduct Waste kWh to bring it in line with the EHO.

Information for Green Gas Certification Scheme							Summary for biomethane meeting emissions criteria		
Start date for quarter		End date for quarter							
Consignment number	Consignment name	Category	Contribution to biomethane produced based on theoretical yield %	Estimate of actual biomethane injected from consignment (kWh HHV basis)	Did the consignment meet the GHG emissions for this quarter?	GHG emissions associated with the consignment for this quarter? (g CO ₂ e/MJ)	Total by category for consignments meeting the emissions criteria	Contribution to biomethane produced based on theoretical yield %	Estimate of actual biomethane injected from feedstock (kWh HHV basis)
1	Whole crop Maize	Product			Yes		Product		
2	Whole crop Rye	Product			Yes		Residues		
3	Sugar Beet Pulp	Product			Yes		Waste		
4	Waste Straw	Waste			Yes		All categories		
5									
6									
7									
8									
9									
10									
Total			100%						

Some versions of the Ricardo calculator include a “Green Gas export” tab. When using that version you should paste the area (as noted in the tab) within the “Double bordered area to be copied into the GGCS reporting workbook” into the Production Declaration. You can then copy the values from the “Estimate of actual biomethane injected from feedstock (kWh HHV basis)” into the table in the declaration.

Information for Green Gas Certification Scheme							RHI Number: RH1000029925	
Total by category for consignments meeting the emissions	Contribution to biomethane produced based on theoretical yield %	Estimate of actual biomethane injected from feedstock (kWh HHV)	Reporting Year	1	Quarter	Q1		
Product			Hi quarter start date	01/01/1900	Hi quarter end date	01/03/1900		
Residues	80%	675,385						
Waste	20%	153,846						
All categories	100%	769,231						
Consignment number	Consignment name	Category	Contribution to biomethane produced based on theoretical yield (%)	Estimate of actual biomethane injected from consignment (kWh HHV)	Did the consignment meet the GHG emissions for this quarter?	GHG emissions associated with the consignment for this		
1		Product	23%	230,769	No	57.2		
2		Residues	62%	675,385	Yes	13.8		
3		Waste	15%	153,846	Yes	13.1		
4								
5								
6								
7								
8								
9								
10								
Total			100%	1,000,000				

If your version of the Ricardo calculator does not include either of the tabs or tables referred to above, then you must use Option B in the Production Declaration which is to enter the % contributions into the table provided. Those values are shown in Column T on the main consignment/feedstock worksheet. The total kWh of gas registered for each quarter across different Energy Source labels must match your EHO figure for that quarter.

Summary of emissions for consignments this quarter									
Quarterly report for OFGEM Ref	COMPLETE WHEN ISSUING		Reporting Year		Quarter		1		
	COMPLETE WHEN ISSUING		Quarter		Q1				
			Start date for quarter		End date for quarter				
	User name	Tonnes used	Emissions from feedstock production (g CO2 e/MJ)	Emissions from AD plant (g CO2 e/MJ)	Emissions from upgrading (g CO2 e/MJ)	Emissions from injection (g CO2 e/MJ)	Total emissions from consignment (g CO2 e/MJ)		
Consignment 1		10,000.0	119.7	5.3	4.2	-	129.2		
Consignment 2		5,000.0	4.4	5.3	4.2	-	13.9		
Consignment 3		2,000.0	-	5.3	4.2	-	9.5		
Consignment 4		-	-	-	-	-	-		
Consignment 5		-	-	-	-	-	-		
Consignment 6		-	-	-	-	-	-		
Consignment 7		-	-	-	-	-	-		
Consignment 8		-	-	-	-	-	-		
Consignment 9		-	-	-	-	-	-		
Consignment 10		-	-	-	-	-	-		

Data entry: consignments and feedstocks (these should be defined as agreed with Ofgem in your FMS)														
Consignment	User name	Base on typical values for:	Mass tonnes	Biogas yield per tonne of fresh matter from feedstock analysis or literature Nm3 biogas/t FM	Methane percentage in biogas from feedstock analysis or literature %	If biogas yield unavailable base on biogas yield data for: %	Typical moisture content of feedstock %	Actual moisture content of feedstock if available %	Typical methane yield per tonne of volatile solid m3CH4/t VS	Create or edit feedstock sheet	Complete with source reference if user value inserted		Theoretical Biogas production m3CH4	Contribution based on theoretical yield %
Consignment 1	Consignment 1:	Product								Create/ Edit				
Year_L_Q1_C1_F1	Feedstock 1	Whole crop maize	10,000	50	55.0%					Create/ Edit			275,000	82.93%
Year_L_Q1_C1_F2	Feedstock 2									Create/ Edit			-	0.00%
Year_L_Q1_C1_F3	Feedstock 3									Create/ Edit			-	0.00%
Year_L_Q1_C1_F4	Feedstock 4									Create/ Edit			-	0.00%
Year_L_Q1_C1_F5	Feedstock 5									Create/ Edit			-	0.00%
Consignment 2	Consignment 2:	Residues								Create/ Edit				
Year_L_Q1_C2_F1	Feedstock 1	Residue	5,000	20	53.0%					Create/ Edit			53,000	15.98%
Year_L_Q1_C2_F2	Feedstock 2									Create/ Edit			-	0.00%
Year_L_Q1_C2_F3	Feedstock 3									Create/ Edit			-	0.00%
Year_L_Q1_C2_F4	Feedstock 4									Create/ Edit			-	0.00%
Year_L_Q1_C2_F5	Feedstock 5									Create/ Edit			-	0.00%
Consignment 3	Consignment 3:	Waste								Create/ Edit				
Year_L_Q1_C3_F1	Feedstock 1	Waste	2,000	4	45.0%					Create/ Edit			3,600	1.09%
Year_L_Q1_C3_F2	Feedstock 2									Create/ Edit			-	0.00%
Year_L_Q1_C3_F3	Feedstock 3									Create/ Edit			-	0.00%
Year_L_Q1_C3_F4	Feedstock 4									Create/ Edit			-	0.00%
Year_L_Q1_C3_F5	Feedstock 5									Create/ Edit			-	0.00%
Consignment 4	Consignment 4:									Create/ Edit				

5.4 Example Feedstock-to-Gas Apportionment Calculation

Your NDRHI or GGSS EHO figure for production period 01/07/2024 to 30/09/2024 is 10,000,000 kWh.

Your apportioning tool shows you that:

- 75% of your biomethane was from feedstocks classified as Product
- 15% of your biomethane was from feedstocks classified as Residue
- 10% of your biomethane was from feedstocks classified as Waste

You can then calculate:

- Product as 75% of 10,000,000 kWh ($10,000,000 * 0.75 = 7,500,000$ kWh)
- Residue as 15% of 10,000,000 kWh ($10,000,000 * 0.15 = 1,500,000$ kWh)
- Waste as 10% of 10,000,000 kWh ($10,000,000 * 0.10 = 1,000,000$ kWh)

You should then register with the GGCS for 01/07/2024 to 30/09/2024 RGGOs with the following Energy Source labels:

- 7,500,000 kWh as “GGCS01 – Biomass (Unspecified) Classification (Product/Co-Product)”
- 1,500,000 kWh as “GGCS02 – Biomass (Unspecified) Classification (Residue)”
- 1,000,000 kWh as “GGCS03 – Biomass (Unspecified) Classification (Waste)”

Adding together the kWh you register against each Energy Source label gives you 10,000,000 kWh which is your EHO figure for that quarter.

5.5 Feedstock-to-Gas Apportionment under the Green Gas Support Scheme

NB: this section only applies when a producer is accredited under the Green Gas Support Scheme (GGSS) and one or more feedstocks in a quarter are above the 24 gCO₂e/MJ GHG threshold.

GHG calculations completed under the GGSS are different to those completed under the NDRHI, with the GGSS methodology allowing an averaging of GHG intensities above and below the threshold.

The Green Gas Certification Scheme will not issue RGGOs to any kWh that are above the GGSS threshold of 24 gCO₂e/MJ which has the potential to occur because we split quarterly production into product, residue, and waste. **Therefore, where one or more feedstock is above the threshold, a producer may either:**

- a) register all kWh from the quarter with a “mixed” Energy Source label; or
- b) conduct an additional calculation showing that the high GHG kWh have been matched to enough low GHG kWh to create a bundle of RGGOs (previously known as a batch) that is at or below the threshold. This will minimise the amount of RGGOs with a mixed label and maximise the amount labelled as Product, Residue or Waste.

The evidence requirements when using option b) will consist of the following:

- A calculation of the averaging of GHG intensity across feedstocks showing that the average for each RGGO issued is below 24 gCO₂e/MJ.
- The calculation must be verified as part of the annual Data Verification Statement (DVS) process.
- If the combination of the feedstocks above and below the threshold are of the same classification i.e. both Products, then RGGOs can be issued as normal i.e. across the three Energy Source labels (Product, Residue, or Waste).
- If the combination of feedstocks above and below the thresholds are of different classifications, then the “Mixed” Energy Source label will apply.

5.6 Example RGGO issuing using option b)

Example Producer A generates 7,500,000 kWh in January to March 2023 using three feedstocks:

kWh	Feedstock Name and Energy Source label	GHG Intensity (gCO ₂ e/MJ)	Total CO ₂ e from feedstock
2,500,000	Maize (Product)	25.00	62,500,000
2,500,000	Potato Peelings (Residue)	20.00	50,000,000
2,500,000	Food Waste (Waste)	10.00	25,000,000
Total			
7,500,000	-	18.33	137,500,000

The average GHG intensity is 18.33 gCO₂e/MJ, therefore the GGSS GHG threshold has been met when looking at the quarter as a whole.

However, if the Scheme were to register the kWh from Maize (Product) as a distinct bundle, then the GHG threshold would be breached and no RGGOs could be issued for the kWh of biomethane from Maize (Product).

Therefore, the producer would register a bundle of RGGOs with a biomass label of “Mixed” which includes the kWh from Maize and enough kWh from either the Potato Peeling or Food Waste to bring the GHG intensity below 24.0 gCO₂e/MJ. This would result in RGGOs being issued as follows:

Energy Source Label	Sustainability Criteria	kWh
GGCS05 – Biomass (Mixed) Classification (Mixed)	Green Gas Support Scheme (GGSS) – UK	3,125,000
GGCS02 – Biomass (Unspecified) Classification (Residue)	Green Gas Support Scheme (GGSS) – UK	1,875,000
GGCS03 – Biomass (Unspecified) Classification (Waste)	Green Gas Support Scheme (GGSS) – UK	2,500,000

The calculation behind the issuing of the RGGOs is shown below. 625,000 kWh of biomethane produced from Potato Peelings (Residue) have been added to the kWh from Maize (Product) to bring the GHG intensity below 24.0 gCO₂e/MJ. This results in 625,000 kWh fewer RGGOs issued in the bundle labelled as Residue.

kWh	Energy Source Label	GHG Intensity (gCO₂e/MJ)
2,500,000	Maize (Product)	25.00
625,000	Potato Peelings (Residue)	20.00
Result for Mixed Energy Source Label		
3,125,000	Mixed	24.00

RGGOs will show that the GHG values are less than the GGSS threshold of 24.0 gCO₂e/MJ (shown as 88 gCO₂e/kWh). You will have the option to record the actual GHG value for each bundle.

Please bear in mind that this is a simplified example. It will be up to the producer to find the best balance of Wastes/Residues/Mixed consignments for your given quarter and range of feedstocks.

6. ISSUING RGGOS FOR BUNDLES SPLIT BETWEEN TWO YEARS

As standard, GGCS issues RGGOs in line with the NDRHI/GGSS quarterly reporting periods.

We recognise that there is increased demand from members for bundles not to straddle two different years e.g. 05/12/2023 to 04/03/2024, with some End-Use Consumers requiring RGGOs by annual vintage.

We have put in place a set of requirements for when such split bundles may be issued, as detailed below in points A, B and C.

(a) You must register both bundles of the split at the same time.

For example we would not issue just for 05/12/2023 to 31/12/2023 and not the other bundle of the split from 01/01/2024 onwards.

(b) If a bundle needs to be withdrawn in order to be reissued as the split, then 100% of the original volume issued needs to be in your account.

Therefore if any of the certificates have been transferred to other parties, then they need to transfer the certificates back to you and if any of the certificates have already been cancelled, then the withdrawal and reissuing process is no longer possible.

(c) Splitting is only permitted where quarters straddle calendar years (with some exceptions for financial years).

Due to the additional administrative burden on GGCS, we will only accept split bundle requests for quarters which straddle a calendar year as described above, or if a request from a trader or consumer is provided, we will allow splitting where quarters straddle a financial year. No other splitting by date will be allowed.

6.2 Required evidence to receive RGGOs for a split bundle

(a) If your quarter starts within 3 days for the end of the calendar or financial year.

If the quarter starts on the 28th, 29th, 30th or 31st of December or the 27th, 28th, 29th or 30th of April, then you do not need to provide any additional evidence. You only need to divide the total EHO by the number of days in the quarter and multiply that “daily value” by the number of days in each production period. This aligns our tolerances with the NDRHI and GGSS tolerances for meter readings being +/- 3 days for the stated period.

You must provide two Production Declarations, one for each bundle, showing your calculation of (EHO / days in quarter * days in bundle) on Tab 1 of the Production Declaration or in a clearly labelled and referenced additional tab.

All other calculations e.g. feedstock to gas calculations will remain the same with no adjustments needed in the Production Declarations.

(b) If your quarter starts on any other day i.e. more than 3 days from the splitting date of December 31st or April 30th.

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You must provide a record of your daily meter readings from the GEMINI system, a calculation of how many kWh were injected in each period and what % of the total quarterly production that represents.

You must then apply that % to the EHO value showing your calculations in Tab 1 of the Production Declaration or in a clearly labelled and referenced additional tab. You should add a Tab into your Production Declaration with the daily meter readings from GEMINI.

Please contact the Scheme if you wish to see an example of the data and calculations we are describing.

6.3 Energy Source (Feedstock) Labels

If you are using more than one classification e.g. waste and product, then you will perform the normal calculation of your apportionment across the quarter and apply those % to each bundle of the split.

6.4 Optional Labels

The table below details the requirements related to the use of optional labels when issuing a split bundle.

Actual GHG value	Evidence will be required confirming your GHG calculations for each bundle. See Production Declaration tab “GHG and Further Information” for more details.
Use of carbon capture	Use of carbon capture could vary between the splits e.g. from equipment failure. Therefore if producers choose to state true or false they must provide evidence of capture or not during the relevant time. See Production Declaration tab “GHG and Further Information” for more details.
Use of manure credit	Only allowed under the GGSS. GGSS plants operate on calendar quarters making the need to split largely redundant. Should a GGSS plant which to split across a financial quarter please contact info@greengas.org.uk
ISCC labels	Adding the name of the Scheme e.g. ISCC and certification dates, is not affected by splitting quarters. However producers must continue to ensure that RGGO and PoS activity are matched and move through the same chain of custody. A single PoS may be issued that represents several RGGO bundles but if those RGGO bundles are transferred to different parities at any stage by a trader then separate PoS must be issued. We recommend issuing one PoS per RGGO bundle but producers should contact their ISCC Certification Body to confirm this is acceptable.

6.5 Additional DVS requirements

There are no additional requirements regarding the timings of submitting Data Verification Statements (DVS) however when you conduct your DVS Table 1 and Tab 3 Gas Data should be adapted to show the issuing and verification of each bundle.

7. LABELLING RGGOS AS PRODUCTION SUPPORT – YES OR NO

In the process of creating your Production Declaration you will provide information on whether Production Support has been received. Production Support means a financial reward from the UK government in the form of NDRHI or GGSS. Therefore, if you have received a NDRHI or GGSS payment, or expect to in the future, for the kWh you are registering your production declaration will include this information and will appear on the RGGO under the “Earmark” label.

If you have kWh that have not and will not receive NDRHI or GGSS then you should select “No Support”, for the Earmark and provide an explanation in your Production Declaration.

There are several instances where you may register biomethane on the GGCS and be issued RGGOs, but will not have received NDRHI or GGSS payment, including when:

- You intend to sell the biomethane to someone who will claim Renewable Transport Fuel Certificates (RTFCs).
- You have injected more biomethane than your accredited capacity.
- You have injected biomethane that has been produced from a liquid feedstock that is not a waste (but you can show that it has met all other NDRHI or GGSS sustainability criteria).
- More than 50% of your annual production has come from Products/Co-Products (see following section for details).

An instance where you inject biomethane for which you will not receive NDRHI or GGSS and are not eligible for a RGGO is:

- Where you have injected biomethane that has been generated from a non-biological feedstock e.g. the fossil content of waste glycerine.¹¹

¹¹ Our rules do allow for RGGOs to be issued for “a gas from a non-renewable source, where the GHG emissions from its production and consumption are calculated according to a recognised methodology and are within a recognised threshold (see 3.5 and 3.7) representing a GHG saving in comparison to the production and consumption of equivalent higher carbon fossil products, or a saving against the GHG emissions related to the alternative disposal of the materials used to generate such a gas.” [Scheme Rules - Governance - Green Gas Certification Scheme](#). However, at this point, we do not have any evidence that gas from the fossil content of waste glycerine meets these criteria.

7.1 When to select “No Support” for the earmark label to reflect repayment of NDRHI/GGSS due to breaching the crop cap (feedstock restrictions)

Plants accredited to the NDRHI after May 2018, or accredited to the GGSS, are subject to a “crop cap”¹² as set out in the NDRHI guidance in the box below. Subject to a calculation at the end of each compliance year, some NDRHI or GGSS payments may be repaid via a reconciliation with a future NDRHI or GGSS payment.

4.128 An example of the way in which feedstock requirements will work in practice is given below:

- Ofgem is required to calculate the value to which periodic support payments for a payment year must be reduced in instances where, for any payment year, less than 50% of the total biogas yield is derived from waste or residue. The following calculation will be used by Ofgem:

Reconciliation of periodic support payment = $A \times (1.5 - B)$

- **Where:**

A is the total periodic support payment for biogas or biomethane for that payment year⁵⁵ (prior to any deduction being calculated)

B is the proportion of the total biogas yield for that payment year which is not derived from waste or residue, expressed as a decimal and rounded to four decimal places

1.5 is the constant used to calculate the value >50%, that is then applied to determine the overpayment value.

⁵⁵Calculated in accordance with regulation 66(2)(b), 67 or 73

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If you have used feedstocks classified as products or co-products at any point within the compliance year, you must supply your Annual Feedstock Declaration to the GGCS at the point you are registering your gas injection for the fourth quarter. This allows us to calculate the number of kWh (if any) for which you will be repaying your production support (NDRHI or GGSS payment).

If you are due to repay any of your production support, you will have two options:

- 1) You can label all your product RGGOs as Production Support – Yes (NDRHI or GGSS). This information will be correct at the time of issuing. You will not be able to change those labels at a later date (when a reconciliation payment is made). However, GGCS does not believe that the

¹² Ofgem refer to “feedstock restrictions” which are effectively a ceiling on how much crop can be used as an input, after which NDRHI and GGSS payments are not received. This is commonly referred to in the biomethane sector as the “crop cap” and is the language we have used in this guidance.

Producer, Trader, or End-Use Consumer using those RGGOs will gain any undue value from this anomaly.

- 2) You can make a Production Declaration and be issued RGGOs for the portion of product RGGOs for which your Annual Feedstock Declaration shows you are eligible for a NDRHI or GGSS payment. You then wait until a reconciliation payment has been made (and provide evidence of that process – see below) for the portion of product RGGOs which were “beyond the crop cap” and use the earmark label “No Support”.

Note that:

- As it is the kWh from product that are subject to the crop cap, then it is the RGGOs with the Energy Source Label “GGCS01 – Biomass (Unspecified) Classification (Product)” that must be labelled as “No Support”.
- Option 2) is suitable as long as the number of kWh of NDRHI or GGSS repayments is lower than the total number of Product RGGOs due to be issued in Q4 of your reporting period (in the example below, total Product RGGOs = 11,000,000 kWh which is less than the 4,000,000 kWh to be labelled as “No Support”).
- If you are using a very high percentage of product e.g. >65%, it is likely that the number of kWh of NDRHI or GGSS repayment will be higher and Product RGGOs from Q3 will also be affected.
- If you are using 100% products as your feedstock, then it will certainly be the case that the production support label for either Q2 or Q3 will be affected. It will not be possible to determine which RGGOs within these quarters will require which label until the total annual production is known at the end of the year.
- GGCS is aware that there are regular delays with reconciliation payments being administered by Ofgem. In theory reconciliation payments can be made in Q1 of the following year, but we are not aware of this happening, with some payments taking a year or more.
- If a reconciliation payment has been conducted at the time you are making your Production Declaration you must use Option 2).
- All RGGOs with residue or waste as the energy source code can be issued without delay and will have the Earmark label – Production Support Yes.

(a) What do we mean by a reconciliation payment?

The technicalities are agreed between a producer and Ofgem and defined as a “*Reconciliation of periodic support payment*”. The following is a simplified example:

A producer has 1,000,000 kWh of biomethane production from year one that is beyond the crop cap. Ofgem will calculate the payment they have made for that as 1,000,000 x [the NDRHI/GGSS Rate e.g. 6 p/kwh]. The producer will then “owe” Ofgem £60,000. In Year Two, Ofgem are due to make a payment of £850,000 for biomethane injected in a quarter but £60,000 is deducted from that total and the producer receives a payment of £790,000. The production support has effectively been removed from the kWh injected in Year One that were beyond the crop cap.

(b) What evidence of reconciliation payment is needed?

- A letter from Ofgem notifying you of how many kWh will need to be reconciled.
- Evidence of your NDRHI/GGSS payment per kWh rate relevant to the affected quarters e.g. screenshots showing your EHO and expected payments.
- Remittance slip showing the amount paid to you in the quarter where a reconciliation payment was factored in and a screenshot showing the “expected payment” in this quarter. The difference between the two should match the reconciled amount.

(c) Why would a producer wait for a reconciliation payment to be issued with RGGOs?

GGCS considers that the potential detriment from failing to label RGGOs with a “No Support” label falls with the producer, who may have been able to secure a higher value from those RGGOs. There is no firm market information to support this, but our view on additionality, as set out here: [Additionality - Certificates - Green Gas Certification Scheme](#); indicates that consumers may be able to make a stronger additionality claim where no support has been provided. Therefore producers may find it in their interest to wait for a reconciliation payment to be made and be able to market their RGGOs with the “No Support” label.

7.2 Example of a crop cap breach and labelling of RGGOs with “No Support”

For the first three quarters of production you are issued with RGGOs labelled as Production Support “Yes - NDRHI or GGSS”.

After the end of Q4, you can calculate the percentage of production from product vs waste/residue over the year and the number of kWh of gas produced from product over 50% (which is the cap). The Annual Feedstock Declaration will give you this calculation.

In the example below the plant has produced 80,000,000 kWh over the year. 44,000,000 kWh have been produced from Product which is 4,000,000 kWh more than 50% of the total production (being 40,000,000 kWh). Therefore, the producer will return 4,000,000 kWh of NDRHI or GGSS production support payments via a reconciliation in a later payment from Ofgem.

Energy Source	Production Support	Q1	Q2	Q3	Q4
Product	Yes	11,000,000	11,000,000	11,000,000	7,000,000
Product	No	-	-	-	4,000,000
Waste	Yes	9,000,000	9,000,000	9,000,000	9,000,000

A reconciliation payment is made in Q1 of the following year and the GGCS considers it is the kWh from product produced in the final quarter of the year which are the kWh on which NDRHI or GGSS is being returned. Therefore, when issuing product RGGOs in Q4 some RGGOs have an Earmark label of No Support and some RGGOs have a label of Yes - NDRHI or GGSS. In this example 7,000,000 kWh of Product RGGOs labelled as Production Support Yes - NDRHI are issued, alongside 4,000,000 kWh of Product RGGOs labelled as No Support.

8. LABELLING RGGOS WITH QUALITY CRITERIA

Within your Production Declaration you will be able to add labels to your RGGOs related to any quality criteria met. Below are further details on each.

Label Name	When to select this label?
Unspecified	This label will generally be used for imported RGGOs representing gas produced outside the UK. UK biomethane production is required to meet a recognised set of criteria such as the NDRHI or GGSS Sustainability Criteria.
Green Gas Support Scheme (GGSS) – UK	<p>1) kWh registered are in receipt of a GGSS payment.</p> <p>Or:</p> <p>2) kWh registered are expected to be in receipt of a GGCS payment at a later date. Please note that you must also provide a DVS which a claim where payments have not yet been approved.</p> <p>Or:</p> <p>3) A DVS has been completed that provides assurance that the GGSS sustainability criteria has been met (even if no payment will be received).</p>
naturemade star	<p>Where your plant is naturemade star certified and you have received permission from your supplier to apply this label (and provided evidence of this to GGCS).</p> <p>Further details are provided in your Production Declaration template.</p>
Non-Domestic Renewable Heat Incentive (NDRHI) – UK	<p>1) kWh registered are in receipt of a NDRHI payment.</p> <p>Or:</p> <p>2) kWh registered are expected to be in receipt of a NDRHI payment at a later date. Please note that you must also provide a DVS which a claim where payments have not yet been approved.</p> <p>Or:</p>

Label Name	When to select this label?
	<p>3) A DVS has been completed that provides assurance that the NDRHI sustainability criteria has been met (even if no NDRHI payment will be received).</p> <p>Note we will not allow GGSS accredited plants to use the NDRHI label.</p>
Renewable Transport Fuel Obligation (RTFO)	When you provide evidence that the criteria in the RTFO carbon and sustainability guidance have been met e.g. by providing a PoS and a verifier's report.

9. ISSUING RGGOS WHERE BIOMETHANE PRODUCTION AND INJECTION ARE AT DIFFERENT LOCATIONS (REMOTE INJECTION)

There are a number of plants now producing biomethane i.e. biogas that has been upgraded to grid quality gas, and transporting it by road in compressed form to an injection site. That site may be a shared injection point such as the Portsdown facility operated by SGN or another biomethane production and injection site.

Any producer who is transporting biomethane to a remote injection site must contact the Scheme Administrator for further guidance on how this process is administered (info@greengas.org.uk)

The address of the plant on the Registration Database will be of the location of the biogas and biomethane production and the plant name will include an affix of (Remote Injection) e.g. Cornwall Biomethane Site Ltd (Remote Injection).

10. DELAYS WITH NDRHI OR GGSS PAYMENTS

Biomethane producers may experience delays in NDRHI or GGSS payments being approved for a variety of reasons.

10.1 Delays related to Maximum Additional Capacity (MAC)

If the delays are to a payment related to Maximum Additional Capacity (MAC), where payment *has* been made for the Maximum Initial Capacity (MIC) registration, then you may include the kWh total from both the initial and additional capacity in your Production Declaration. The template provided to you should provide space to account for this.

In the Production Declaration you should include screenshots showing the NDRHI or GGSS register for both your MIC and MAC.

Please note that:

- As additional evidence you must provide the BEES spreadsheet that you have provided to Ofgem, showing the calculation of your EHO across your MIC and MAC.
- As soon as payment has been approved on the MAC then you must upload a new evidence Production Declaration which shows that the NDRHI or GGSS has been paid (in Tab 2).

10.2 Delays related to any other reason

If no NDRHI or GGSS payment has been made for any part of the plant's capacity (you may not have any additional capacity), then it is still possible for RGGOs to be issued.

You should submit a Production Declaration containing evidence of the NDRHI or GGSS you have applied for e.g. BEES Spreadsheets and NDRHI/GGSS register screenshots.

You can then employ an independent party to carry out a GGCS Data Verification Statement (DVS)¹³ which will compare the values in the Production Declaration to your GEMINI readings of kWh injected and propane and fossil heat meter readings. When that DVS has been completed and uploaded you should then contact the Scheme Administrator to notify us, and we will complete the approval process.

Any DVS that is completed to verify gas injections that have not yet been awarded NDRHI or GGSS payments can be updated at the end of the year to fulfil the annual verification requirements.

¹³ See Sections 6 and 7 of this guidance document and GGCS Guidance Document 1h - GGCS Data Verification Statement Template accessible here: <https://www.greengas.org.uk/news/ggcs-guidance-documents>.

11. NAVIGATING G-REX – GETTING STARTED

11.1 Logging in

When your account is created by the Scheme Administrator, your designated primary contact will receive an invitation email from noreply@grexel.com containing an account setup link and asking you set up a password and link the account to an authenticator app (the G-REX website suggests using the Microsoft Authenticator app). This user will be given the role of “AH Root” (see below for details of the user privileges of this role).

A Quick Response (QR) code will be provided which instructs you to add a profile to your authenticator app on your desktop or mobile device. This form of Multi-Factor Authentication will increase the security of your GGCS account.

Full instructions can be found on the G-REX website: <https://grexel.com/energy-certification/frequently-asked-questions/#toggle-id-5>.

Should you run into any issues when trying to setup your account, please contact the Scheme Administrator on info@greengas.org.uk and we will be happy to assist.

11.2 Adding new users

Your primary account holder can add more users to an account as needed.

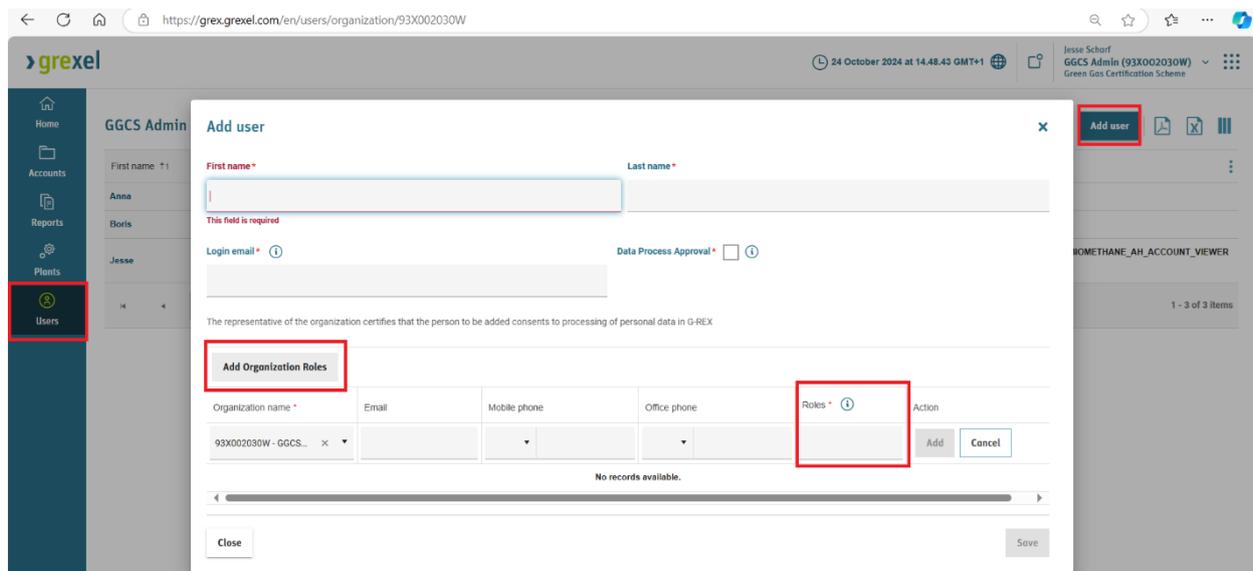
When new users are added they will receive an email from noreply@grexel.com with instructions of how to set up their account.

Users can have different roles, and further details are available in the *G-REX Account Holder User Manual* provided by Grexel. This manual is accessible from your account via the ⓘ icon in the bottom right hand corner of the screen, highlighted in the below screenshot. We have also provided information on some recommended user roles below.

NB: you should ensure that you only give full AH Root access to trusted individuals as this level of access has the right to delete existing User Accounts.

The screenshot shows the G-REX user management interface. The left sidebar has a 'Users' tab selected. The main content area displays a form for adding a new user. The form is divided into several sections: 'Meter readings' with a date field (31/12/2022 22:00) and an 'End date time' field; 'Production device name' (TEST DEVICE 22) and 'National ID'; 'Description' and 'Declaration types' (License declaration); 'Production device GSRN' (643002406493000034); and 'Address' (Street: Test street, Zip code: 12934, City: EXETER, Country: United Kingdom). A help icon (i) is highlighted in the bottom right corner of the form area. The footer of the page includes 'Green Gas Certification Scheme terms and conditions for the registry' and '© Grexel 2024'.

To add a new user select the **User** tab, select **Add user** and add the name, email, and roles you want.



11.3 Recommended role settings

Users can be given two or more roles which can help provide all relevant privileges. If you wish to set someone up with a restricted role (being all those other than AH Root), please test those roles to ensure that the functions that are available and unavailable are as you wish.

AH¹⁴ Root

Recommended for a single super user at each organisation.

This “super user” will be able to perform all available functions including adding and removing other users. Any user given this role does not need to be allocated any other role.

“GGCS Biomethane AH Account Administrator” and “AH PD Editor”

Recommended for other users at an organisation

Users given these two roles will be able to perform all the issuing, transfer and cancellation functions but will not be able to add or remove other users.

“GGCS Biomethane AH Account Viewer” and “AH PD Editor”

Recommended for auditors e.g. DVS authors

These roles will allow auditors to see which RGGOs have been issued and download Production Declarations, while preventing them from transferring or cancelling RGGOs or adding or removing users.

NB: should your company name or other contact details change, please have your Primary Account Holder email GGCS (on info@greengas.org.uk) outlining the changes.

¹⁴ AH stands for Account Holder.

11.4 Using the API

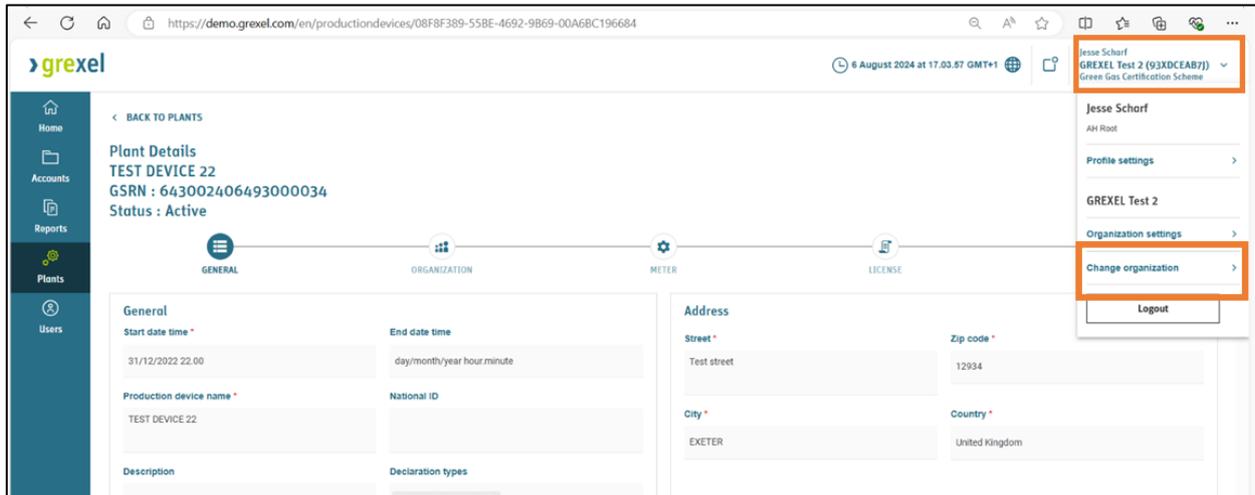
Every function in G-REX can be accessed using an Application Programming Interface (API). If Scheme Participants wish to use this function, they have the responsibility of establishing the necessary processes. GGCS will supply you with the G-REX API manual on request (info@greengas.org.uk).

GGCS are not in a position to provide technical advice on API programming and while we can request some further information from Grexel they are unable to provide in depth technical support due to the large (over 10,000) number of G-REX users around Europe. For further support they offer a chargeable API integration service - [G-REX Integration](#).

12. NAVIGATING G-REX - ORGANISATIONS, SUB ACCOUNTS, AND PLANTS

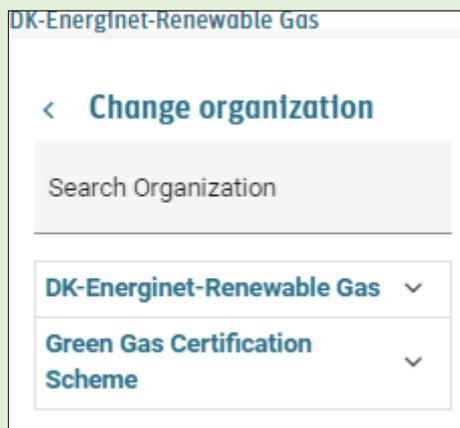
12.1 Organisations

Each company with its own contract with the Scheme Administrator will be set as an Organisation in G-REX and will have its own account. As above Users can be given access to one or more accounts and may switch between accounts (Organisations) once logged in.



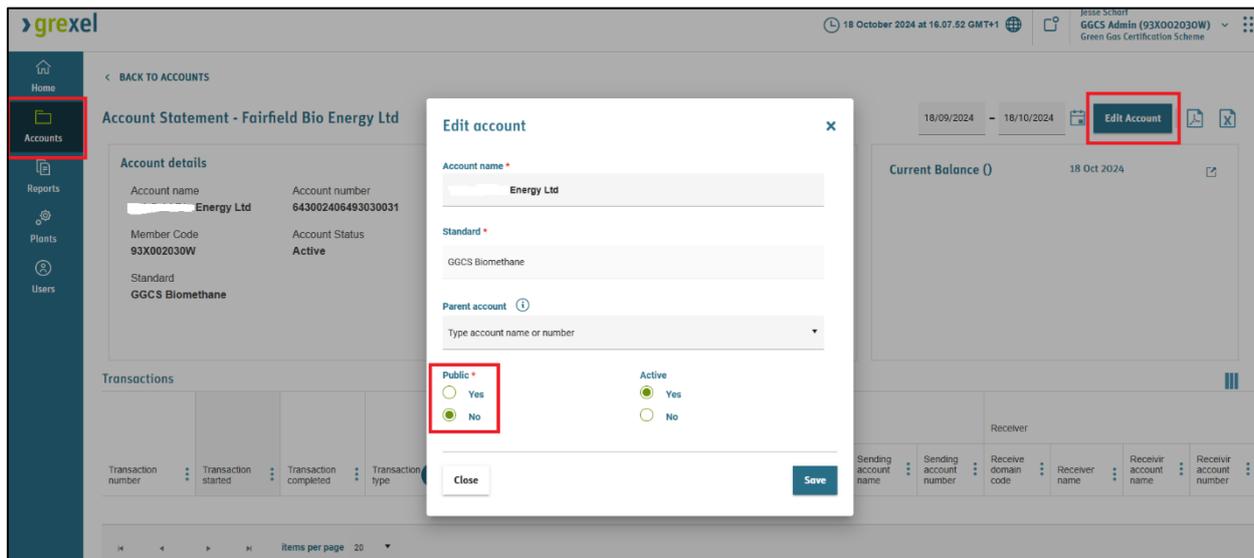
NB: if you already have an account on another G-REX registry e.g. Energinet, you must log in using the exact email address (including letter case/capital letters) as the email used for the Energinet account.

After logging in, you can then click at the top right of the page where it states your login credentials i.e. name, account name, and domain and go to "Change organization". Your GGCS account should appear as a separate drop down menu (see below).



12.2 Sub Accounts

Within your account you can set up sub accounts (see below). You may have sub accounts for each plant and additional sub accounts can be set up by users for their own purposes e.g. accounts for trading, or accounts to divide RGGOs by vintage or energy source. Sub accounts can be set as “Public” or not by selecting the account, selecting edit account and selecting yes or no (see screenshot). If an account is public then other members can transfer RGGOs into that account, if not it will not appear as an option and any RGGOs would be transferred to you by counter parties will come into your default account.



RGGO issuing and sub accounts.

The process used to migrate RGGOs over to G-REX resulted in those RGGOs being issued into sub accounts that are named in line with the plant names on the system.

When issuing “new” RGGOs on G-REX they will be issued into the organisations “Default account”. Members can continue to use the sub accounts to help administer their processes, for example immediately after issuing RGGOs could be moved into relevant sub accounts, and transferred to counterparties from there.

12.3 Plants

Any plants owned by the company who operates the account will be shown in the “Plants” menu.

By Selecting the plant name you can see all details the scheme has record about this plant and you should contact us (info@greengas.org.uk) if there is any incorrect information.

When you have selected a plant you can navigate between different pages including “Documents” where you can upload Production Declarations.

13. NAVIGATING G-REX – HOMEPAGE

Your account home page provides an overview of your account.

It will show you the total RGGOs you have on your account and how many are close to expiry.

13.1 Your G-REX Organisation ID

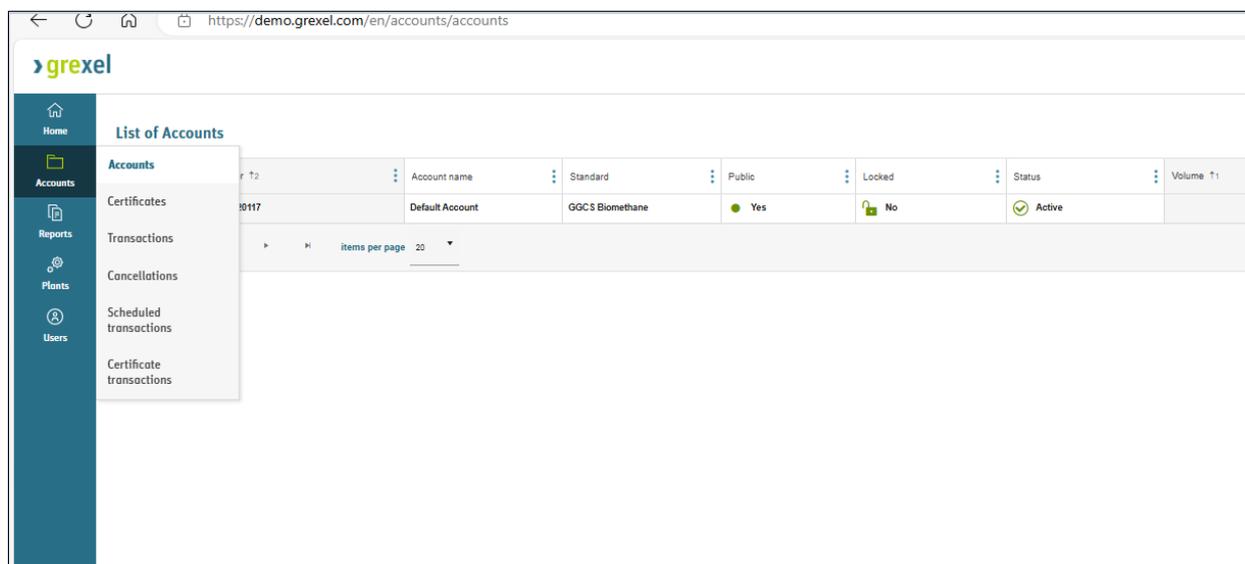
The top right hand corner of your account will show your **Organisation ID** in brackets:



This is your Organisations unique ID on the G-REX database and should be used as the key identifier when transferring RGGOs with other participants (your legacy **P0000** or **S0000** format ID from the previous database (and still shown on our website) is still part of your account details but is not visible to other participants).

14. NAVIGATING G-REX – DIFFERENT VIEWS OF YOUR ACTIVITY

The G-REX system presents information in grids which can be sorted and filtered (see 14.1). You can also move the columns (by clicking and dragging) and hide and show different columns and these can be saved and shared (see above). Under the Accounts menu there are six options to view your activity.



Accounts – this page shows you all accounts that have been set up within your main account (Organisation). There will always be a “Default Account” and there may be sub-accounts you have set up yourself. When selecting an account you will be shown all activity (issuing, transfers and cancellations) related to that account. This is a shortcut to filtering the main “Transactions” grid (see below) by your sub accounts. From this page you can create new sub accounts, edit the names of existing accounts and transfer or cancel all Certificates from an account.

Certificates – this page shows you a table of Certificate (RGGO) bundles that are currently held on your account (and have not yet expired). You can select bundles you wish to transfer or cancel (see sections 16 and 17 below).

Transactions – this page shows you all the activity in your account, including Certificates issued to your plants, received, transferred to others, expired or cancelled. You can filter the grid by transaction type e.g. transferred or cancelled, and by sender and receiver. Each transaction e.g. receipt of Certificates from another member, may include one or more Certificate bundles. Select the transaction number to view the full details of each transaction.

Cancellations – this page shows you all Cancellations you have made. This is a shortcut to filtering the Transactions page to show only Cancellation transactions. Each cancellation may include one or more Certificate bundles. Select the transaction number to view the full Cancellation Statement.

Schedules Transactions – this page will show you any transfers or cancellations that you have scheduled to take place in the future.

Certificate Transactions – any transfer or cancellation transaction may contain multiple bundles of Certificates, for example when you transfer to a trader three bundles of Certificates in one action. This page will show you all transfers and cancellations on a bundle by bundle basis. We recommend filtering the table by Transaction type as a starting point.

Version No. | GGCS.GD1.2804025.v2.0

14.1 Editing the Grid Views

At the top right of the screen you will see a number of options to change the information in the grid.

Transaction type	Status	Volume	Unit	Standard	Sender	Receiver	Transaction approval organization
Transfer	Completed	40 854 900	kWh	GGCS Biomethane	GB-GGC5	64300240649303...	64300240649302...
Transfer	Completed	38 265 191	kWh	GGCS	GB-GGC5	64300240649303...	64300240649302...

Setting Description	Illustration
Select these options to clear sorting or filters on the grid. You may find your browser cookies are saving sorting or filters from previous sessions or sorting or filters from other pages you have recently viewed, and you need to clear them.	
If the grid is not loading or you have changed the date range, then you should select refresh grid.	
Ensure you have selected the date range for the information you are searching for. If you are unsure then select a start date from 2010 (before the GGCS started), and Today for the end date.	
Share Grid View as a link. When you select this icon you will copy a URL to your clipboard which you can share with others. When selecting this URL an account user will be shown the same grid e.g. Certificates > Energy Source name filtered to show wastes.	

Setting Description	Illustration
<p>Save Grid View as a Template and view previously saved Grids</p> <p>When you select this icon you will be asked to name the “grid template” or you view previously saved Grids. E.g. Certificates > Energy Source name filtered to show wastes. You can build up a collection of common grids you want to see e.g. filters with Production Device names, date ranges of production, kWh values between 500,000 and 1,000,000 etc.</p>	
<p>Select this icon to download the grid shown on the page as a PDF.</p>	
<p>Select this icon to download the grid shown on the page as an Excel spreadsheet.</p>	
<p>Select this icon to add or hide columns from the grid view. There are default columns on each page which you can then change via this function.</p>	

15. NAVIGATING G-REX – RECEIVING RGGOS

You can receive RGGOs from any other GGCS account. RGGOs will arrive in your account without any approval e.g. accept/reject function, and will go to your Default Account unless you have made a sub account public, and that account was selected by your counterparty.

Note that RGGOs are referred to as Certificates within G-REX.

You will not receive any email notification of RGGOs arriving in your account.

The person sending the RGGOs can include a message in that transaction which you will be able to view e.g. a contract reference.

You can see a record of transactions involving incoming RGGOs by:

- Selecting **Accounts** from the left hand menu and then selecting **Transactions**.
- Selecting the **date range** the transfers you want to see.
- Filtering the **Transaction Type** column to show **Transfers**.
- Filtering the **Receiver name** to show the account for which you require the records for (you will have a default account, but may set up sub accounts over time, where RGGOs can be transferred into).
- Filtering the **Sender Name** for particular organisations that you want to see the incoming transfers from.

The screenshot shows the Grexel Transactions page. The table displays the following data:

Transaction number	Transaction started	Transaction completed	Transaction type	Status	Volume	Unit	Standards	Sender	Receiver	Transaction approval organization				
								Sender domain code	Sender name	Sending account number	Receiver domain code	Receiver name	Receiving account number	Approval organization ID
2023081800000009	18/08/2023, 14.35	18/08/2023, 14.35	Transfer	Completed	30	MWh	EEC5 energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	
2023082400000003	24/08/2023, 5.46	24/08/2023, 5.46	Transfer	Completed	30	MWh	EEC5 energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	
2023082400000012	24/08/2023, 9.46	24/08/2023, 9.46	Transfer	Completed	60	MWh	EEC5 energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel Test3	64300240642000...	
2023083000000008	30/08/2023, 17.32	30/08/2023, 17.32	Transfer	Completed	6 000	MWh	EEC5 energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	
2023090800000013	08/09/2023, 15.08	08/09/2023, 15.08	Transfer	Completed	1 000	MWh	EEC5 energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	
2024052700000024	27/05/2024, 11.54	27/05/2024, 11.54	Transfer	Completed	1	MWh	EEC5 energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	

You can see the same information on a bundle-by-bundle basis (rather than seeing transactions that might have involved multiple bundles being transferred) via the Certificate Transactions view

16. NAVIGATING G-REX – TRANSFERRING RGGOS

As the holder of a Producer account you have the ability to transfer your RGGOs to any other GGCS member.

Contracts and agreements for the transfer of RGGOs are arranged outside the scope of the GGCS. When you have reached an agreement, you log in to your GGCS account to transfer the agreed RGGOs to the relevant counterparty. Those RGGOs are instantly removed from your account and placed in the account of the nominated party¹⁵.

NB: When you transfer RGGOs the transaction is final, and it is your responsibility to ensure you have selected the correct counterparty.

16.1 Process for transferring RGGOs

To see the RGGOs available for Transfer select **Accounts** and then select **Certificates**.

Note that RGGOs are referred to as Certificates within G-REX.

You can filter and sort the columns to find the bundles of RGGOs you wish to transfer e.g. by production start and end date.

You can select multiple bundles to transfer using the tick boxes on the left side of the grid.

When you have selected the bundle of RGGOs you wish to transfer, select **Transfer** button at the top of your screen.

Certificate bundle		Account		Issuer		Energy source			
Volume	Status	Unit	Account number	Account name	Issuing country code	Issue date	Standard	Trading schemes	Energy source name
<input checked="" type="checkbox"/>	2 500	Active	MWh	643002406420000014	Default Account	FI	31/08/2023	EECS energy gas GO Energy Gas	Renewable/Gaseou gas/Manure
<input type="checkbox"/>	2 495	Active	MWh	643002406420000014	Default Account	FI	31/08/2023	EECS energy gas GO Energy Gas	Renewable/Gaseou gas/Energy crops

¹⁵ In the previous IT system the receiving party received an email and then logged in to accept or reject the transfer. That is no longer the case.

You will then be shown the following pop up box:

Transfer Certificates [X]

VOLUME

Selected volume: 2600 Transfer all selected certificates

Volume Percentage

Transfer volume * ⓘ Unit *

MWh

RECEIVER

Domain *
Grexel Gas Demo Domain

Account Holder *
69XA07479B - Grexel AH [X]

Account *

Enter account number/ member code ⓘ

Message to receiver ⓘ

TRANSFER TIME

Transfer now
 Schedule transfer

- Choose the exact number of kWh or a % of the total bundle(s) you wish to transfer or select the box to **transfer all of selected certificates**.
- Select the **Green Gas Certification Scheme** domain¹⁶.
- You should then select the **Account Holder** you wish to transfer the Certificates to. The Account field will populate automatically based on your selection¹⁷.
- If you are unable to find the name of the **Account Holder** you are trying to transfer to in the drop down menu, click into the grey **Account Holder** box (press the “x” to clear the field) and

¹⁶ If you are transferring RGGOs to accounts in other registries see Guidance Document 7.

¹⁷ You can select yourself as the Account Holder and transfer the Certificates between your sub accounts with the Account field.

either type in the name of the organisation, or input their **Organisation ID**. Due to the large number of accounts on G-REX, the drop down menu will only show the first 100 by default, but will search the entire database if you input a name or ID.

- If that account holder has public sub-accounts then they can be selected in the Account box.
- Using the **Message to receiver** field you can send a message to the recipient of the Certificates, for example a contract reference or invoice number.
- You can then choose to transfer the Certificates now or schedule the transfer for the future.
- You will be asked to confirm your transfer. Ensure you have checked the details before selecting yes.

The screenshot displays a web interface for transferring certificates. A modal dialog box titled "A Please confirm" is centered on the screen. The dialog asks, "Are you sure you want to transfer 5095 MWh certificates with the following details?" and lists the following information: Organization: London Biomethane Trader Ltd, Account: 643002406420000052, and Domain: Grexel Gas Demo Domain. Below the text are two buttons: "No" and "Yes". The background interface is partially visible, showing a "RECEIVER" section with dropdown menus for "Domain" (Grexel Gas Demo Domain), "Account Holder" (69X35AED7X - London Biomethane Trader Ltd), and "Account" (643002406420000052). There is also a "Message to receiver" field containing "Test Trans". Below the dialog, the "TRANSFER TIME" section has two radio buttons: "Transfer now" (selected) and "Schedule transfer". At the bottom of the interface are "Close" and "Transfer" buttons.

There will not be any email notifications sent to the recipient. If you wish to notify them of your transfer then you should contact them with the details you have.

17. NAVIGATING G-REX – RGGO CANCELLATION

This process was previously referred to in our rules and guidance as Retirement. However, Cancellation is the terminology used across Certificate Systems in Europe and is now the term in use within the GGCS.

Cancellation does not mean that Certificates are taken out the system. It refers to the process of allocating them to an End-Use Consumer who becomes the “Beneficiary” of those Certificates and is provided with a “Cancellation Statement”. Cancelled Certificates will then be unavailable to be transferred or allocated to any other consumer.

NB: once RGGOs are Cancelled this cannot be reversed and details on a Cancellation Statement, such as the name of beneficiary, cannot be edited.

This is to protect the RGGO system against the risk of double counting via double allocation to consumers.

All contracts with Scheme Participants state that they “shall be responsible for all...Cancellation Requests [and] for the consequences for all such requests” and “nor shall the Scheme Administrator [REAL/GGCS] be liable for any losses arising from any inaccuracy or incompleteness of such...action [s]” (Producers Clause 4.4, Traders/Account Holders Clause 4.8).

We urge all Scheme Participants to put in place the strongest possible checks on their Cancellation processes to protect against errors.

Cancellation can be carried out by selecting one or more bundles of Certificates and selecting Cancel Certificate from the top of the screen. After which they will be shown on the screen below.

Cancel certificates ✕

VOLUME

Selected volume: 1 Cancel all selected certificates

Volume Percentage

Cancel volume * i

|

This field is required

BENEFICIARY

Note: Type in the beneficiary name or select a saved beneficiary from the dropdown.

Name of beneficiary * i Beneficiary type * i

Name of beneficiary ▼ Select ▼

Country of consumption * i Location of beneficiary * i

United Kingdom ▼

Cancellation purpose * i

CONSUMPTION

Usage category * i

Select ▼

Consumption period start * i Consumption period end * i

day/month/year 📅 day/month/year 📅

Save as cancellation beneficiary i

As G-REX is a platform that has been designed to fulfil the requirements of Guarantee of Origin (GoO) registries adhering to the CEN 16325 standard and the EECS rules, there are some fields that are not strictly necessary for the GGCS.

Some GGCS members may wish to take the opportunity to use those fields to generate a more detailed Cancellation Statement e.g. add an exact location of the Beneficiary. However, you can enter an asterisk (*) or a hyphen (-) as a way of leaving those fields blank.

Field Name	Field Description
Volume	You can select a Volume (amount) or Percentage of the selected bundles, or Cancel all selected certificates in those bundles.
Name of Beneficiary	You must name an End-Use Consumer as set out in the GGCS Scheme Rules: Scheme Rules - Governance - Green Gas Certification Scheme . Further guidance on the details you should enter into this field is provided in section 20 of this guidance. You may wish to include a company number alongside a company name.
Beneficiary Type	You must select End-Consumer.
Country of Consumption	You must select the country where the gas was consumed. If there are several locations where gas is being consumed then you should make separate Cancellations.
Location of Beneficiary	You should discuss with the consumer in question what they would like to see in this field which will help them identify themselves as the Beneficiary. You can enter an address or indicate name of a facility e.g. Factory A. You cannot leave this field blank, but you may enter n/a or *.
Cancellation Purpose	You can add details that will support the consumer or yourself to manage the Cancellation process e.g. “fulfilment of 2024 obligation” or “gas supplied to vehicles”. You may use this field to add a company number alongside a company name. You cannot leave this field blank, but you may enter n/a or *.
Usage Category	You must select “Cancellation – Disclosure”. For any context around the disclosure type e.g. it being related to a tariff or individual consumer, you can enter details into the Cancellation Purpose field.
Consumption Period Start and End	You should enter the dates that relate to when the consumer wishes to match its gas use with the biomethane represented by the Certificates/RGGOs. You may select any date range and should discuss this with the consumer in question.
Save as cancellation beneficiary	If you would like this Beneficiary to appear in a drop down menu in the “Name of Beneficiary” during future cancellations then check this box. When this Beneficiary is chosen in the future the type, country, location, and purpose fields will be auto populated with the same information but can be edited as needed.

Field Name	Field Description
Public Cancellation	If you would like the Cancellation Statement to include a URL which can be provided to the Beneficiary so they can use to view the statement online then check this box. We recommend you select this option.
Cancellation Time	You may choose to Cancel now or to Schedule cancellation for later.

Please refer to subsequent sections on naming End-Use Consumers, green gas tariffs, LNG consumption, and gas supply to vehicles, for more information on the cancellation process.

NB: once RGGOs are Cancelled this cannot be reversed and details on a Cancellation Statement, such as the name of beneficiary, cannot be edited.

This is to protect the RGGO system against the risk of double counting via double allocation to consumers.

All contracts with Scheme Participants state that they “shall be responsible for all...Cancellation Requests [and] for the consequences for all such requests” and “nor shall the Scheme Administrator [REAL/GGCS] be liable for any losses arising from any inaccuracy or incompleteness of such...action [s]” (Producers Clause 4.4, Traders/Account Holders Clause 4.8).

We urge all Scheme Participants to put in place the strongest possible checks on their Cancellation processes to protect against errors.

18. NAVIGATING G-REX – VIEW CANCELLATION STATEMENTS

To see the Cancellations you have made and download Cancellation Statements, you should select **Accounts** from the left hand column and then select **Cancellations**.

Cancellations											Refresh grid 21/08/2023 - 21/08/2024			
Transaction number	Transaction started	Transaction completed	Status	Volume	Unit	Standard	Sender			Beneficiary				
							Sender name	Sending organization ID	Sending account number	Beneficiary name	Country of consumption	Consumption period start	Consumption period end	
2023081000000031	31/08/2023, 10.30	31/08/2023, 10.41	Completed	5	MWh	EECS energy gas	Greex AH	69XA07479B	64300240642...	Test UK Ltd	United Kingdom	01/01/2023	31/12/2023	
2023081000000032	31/08/2023, 10.41	31/08/2023, 10.41	Completed	4	MWh	EECS energy gas	Greex AH	69XA07479B	64300240642...	Test UK Ltd	United Kingdom	01/01/2021	31/12/2021	
2023092700000049	27/09/2023, 16.13	27/09/2023, 16.14	Completed	1	MWh	EECS energy gas	Greex AH	69XA07479B	64300240642...	Test UK Ltd	United Kingdom	01/01/2023	31/01/2024	
2024010400000014	04/01/2024, 14.43	27/05/2024, 11.55	Completed	2	MWh	EECS energy gas	Greex AH	69XA07479B	64300240642...	Test 1	Finland	01/01/2024	07/01/2024	
2024052700000038	27/05/2024, 12.55		Pending approval from ID	50	MWh	EECS energy gas	Greex AH	69XA07479B	64300240642...	Greex 2	Finland	01/01/2023	31/12/2023	

Remember to first select the date range in the top right corner for the cancellation statements you wish to see e.g. if you want to view all statements generated in 2023 you should select 01/01/2023 to 31/12/2023.

You can filter and sort all rows and hide and unhide columns. If, for example, you wanted to see all Cancellations to a particular consumer then you should add the column for Beneficiary Name by selecting the three bars at the top right and adding that column. Then filter the Beneficiary's name column that will appear by the consumer's name.

The values in the **Transaction number** column are links that will take you to individual **Cancellation Statements**. Each Statement can have multiple bundles of RGGOs within it. Those are listed as a table at the bottom, and you can select the + symbol to see the full details of that bundle.

Cancellation Statement											Expand rows					
<p>This cancellation statement acts as a receipt for the certificates listed below and for the purpose shown. With this Cancellation Statement, released on the Transaction Date, the indicated certificates are no longer available. Greex sale of this Cancellation Statement is prohibited. The environmental qualities of the associated energy have been consumed and this Cancellation Statement and these certificates may not be transferred to any party other than the energy supplier or end-consumer specified below.</p>																
Transaction details Transaction type: Cancellation Transaction number: 2023081000000031 Transaction started: 31/08/2023, 9.30 Public Statement: No			Status Completed			From account Organization name: Greex AH Business ID: F9903542 Domain: Greex Gas Demo Domain Account number: 643002406420000038 Street: ZIP code: 00580			Organization ID: 69XA07479B Physical Person ID: Domain code: GR-GAS City: Helsinki Country: Finland			Beneficiary Name of Beneficiary: Test UK Ltd Organization ID: 69XA07479B Consumption period: 01/01/2023 - 31/12/2023 Cancellation purpose: Test UK Ltd			Country of consumption: United Kingdom Location of beneficiary: UK Usage type: Disclosure Type of beneficiary: End consumer	
Volume	Unit	Certificate number start	Certificate number end	Issuing body	Energy source code	Technology code	Production Sta...	Production En...	Issue date	Trading schemes						
+	5	64300240642100091000000000071	64300240642100091000000000075	Greex Systems OY	F01012021	H070000	01/01/2023	31/01/2023	18/08/2023	GO Energy Gas						

19. NAVIGATING G-REX – BUNDLE BY BUNDLE TRANSACTION RECORD

To see a history of all certificate transactions performed by the Account Holder on a bundle-by-bundle basis, select **Accounts** and then **Certificate transactions**. This can be useful when you want to check what transactions (e.g. issuances, transfers, or cancellations) took place over the course of a month or quarter for auditing, cross-checking or reporting purposes.

Certificate transactions															
Refresh grid GGCS Biomethane 10/07/2024 - 10/10/2024															
Certificate								Transaction							Attributes
Certificate transaction ID	Certificate number start	Certificate number end	Certificate volume	Status	Energy source name	Technology name	Production device name	Transaction type	Transaction status	Transaction number	Transaction completion date	Sender organization name	Receiver organization name	Capacity gas production	
31F11C64-7739-41E2-8735-CDF2F6B81CFB	643002406493...	643002406493...	10 000	Active	Biomass (Wastewater) Classification (Waste)	Anaerobic digestion	Grexel Test	Issuing	Completed	20240905000000001	05/09/2024, 9.39	Grexel Test	Grexel Test	1000	
AF9A0F50-CBE1-4224-B5A0-AFEECCF425D	643002406493...	643002406493...	600 000	Active	Biomass (Unspecified) Classification (Waste)	Anaerobic digestion	Grexel Test	Issuing	Completed	20240905000000002	05/09/2024, 9.41	Grexel Test	Grexel Test	1000	

You can also click into the individual certificate in blue bold text in the **Certificate number start** column to get the full details of the RGGO bundle in question.

Certificate Transaction vs Transactions

Because G-REX allows you to transfer and cancel multiple bundles of RGGOs in the same Transaction you can either view these as **Transactions**, from which you will need to click through to see which bundles were involved, or look at the **Certificate Transactions** page to see the bundle-by-bundle view, with each entry containing a transaction number linking it to any other bundles transferred or cancelled in the same transaction.

20. NAVIGATING G-REX – RGGO EXPIRY

The Scheme Rules state in clause 16.1 that *“If, three years and three months after the date of the injection of Green Gas into a Distribution Network, RGGOs created in respect of that Green Gas have not been retired or withdrawn, they will expire and will no longer be available to Gas Producers or Account Holders [Traders]”*.

To implement this rule the Registration Database counts 39 months (being the number of months in three years and three months) from the Production End date. The RGGOs will expire on or around midnight on that day.¹⁸

For example:

- RGGOs (referred to as Certificates in G-REX) have a production end date of 15/04/2022.
- 15/04/2022 plus 39 months (equivalent to three years and three months) is 15/07/2025.
- On or around 23:59:59 on 15/07/2025 the RGGOs will expire.

The exact time of expiry e.g. 23:59 or 00:01 the following day, depends on the speed with which the G-REX expiry program runs. To avoid expiry GGCS members should transfer or cancel relevant RGGOs during normal business hours e.g. before 18:00 that day.

Once the status of the RGGOs becomes **Expired** you will not be able to Transfer or Cancel those RGGOs.

NB: it is the responsibility of members to monitor their RGGOs for expiry.

20.1 Finding Certificates that are approaching Expiry

The **Home** tab of your account will show you the volume of Certificates that are within 180 days of Expiry.

To find relevant Certificates you can sort and/or filter Certificates you are holding (select **Accounts** and then **Certificates**) by the Production End date. You could:

- sort to show the Production End date furthest in the past to see your “oldest” RGGOs.
- use this calculator – [Date Calculator: Add to or Subtract From a Date – Results \(timeanddate.com\)](#) – to subtract 39 months from today’s date and then filter for Certificates that have a Production End Date between that date and three months after that date. That will show you the Certificates which will expire in the next three months.

¹⁸ This is a change from the current calculation of 1185 days from the first of the month that the production period ended in. The effect of this change may extend the expiry date by up to 30 days (beyond the date shown on the database at the point of migration on 09/08/2024).

20.2 Finding expired Certificates

Select **Accounts** from the left hand column then select **Transactions**. You can then filter the **Transaction Type** column to show on **Expiry**. Remember to select the date range you would like to view in the top right of the page.

The screenshot shows the Grexel Transactions page. The left-hand navigation menu has 'Accounts' selected. The 'Transactions' tab is active. The table displays the following data:

Transaction number	Transaction started	Transaction completed	Transaction type	Status	Volume	Unit	Standard	Sender	Receiver	Transaction approval organisation				
Transaction number	Transaction started	Transaction completed	Transaction type	Status	Volume	Unit	Standard	Sender domain code	Sender name	Sending account number	Receiver domain code	Receiver name	Receiving account number	Approval organisation ID
2024022000000006	23/08/2024, 1:00	23/08/2024, 1:00	Reply	Completed	10 012 930	kWh	GGCS Stonehane	GB-GGCS			GB-GGCS			
20240220000225139	28/05/2024, 16:32	28/05/2024, 16:32	Cancellation	Completed	370	kWh	GGCS Stonehane	GB-GGCS			GB-GGCS			
20240912000211344	12/06/2024, 10:33	14/06/2024, 9:26	Transfer	Completed	2 451 882	kWh	GGCS Stonehane	GB-GGCS			GB-GGCS			
20240912000211345	12/06/2024, 10:33	14/06/2024, 9:26	Transfer	Completed	5 614 738	kWh	GGCS Stonehane	GB-GGCS			GB-GGCS			

21. NAMING END-USE CONSUMERS (BENEFICIARIES)

As a first step you should ensure you understand the distinction between transferring RGGOs to another GGCS Trader and Cancelling RGGOs. Transferring RGGOs will move them to another GGCS account. Cancelling RGGOs will allocate them to a consumer, and they will no longer be available to you for further transfer or cancellations.

NB: once RGGOs are Cancelled this cannot be reversed and details on a Cancellation Statement, such as the name of beneficiary, cannot be edited.

This is to protect the RGGO system against the risk of double counting via double allocation to consumers.

All contracts with Scheme Participants state that they “shall be responsible for all...Cancellation Requests [and] for the consequences for all such requests” and “nor shall the Scheme Administrator [REAL/GGCS] be liable for any losses arising from any inaccuracy or incompleteness of such...action [s]” (Producers Clause 4.4, Traders/Account Holders Clause 4.8).

We urge all Scheme Participants to put in place the strongest possible checks on their Cancellation processes to protect against errors.

Our Scheme Rules and guidance refer to **End-Use Consumers** or **Consumers** and within G-REX they are referred to as **Beneficiaries**.

21.1 Consumer requirements

It is your responsibility to ensure that the consumer will be happy with the way they have been named as the Beneficiary on Cancellation Statements.

Ensure you use the correct spelling and name the correct entity (when they are a company with multiple subsidiaries). We recommend that this is directly confirmed to you by the consumer. If you do not name the consumer correctly then they may not be able to make a valid claim of green gas use, and the Cancellation Statement may not have any value to them.

You may wish to consider including a company number alongside a company’s name.

21.2 Our Scheme Rules and Guidance

You must be sure that you are naming an entity which meets our definition of an End-Use Consumer according to our Scheme Rules and guidance documents. **You should refer to the Scheme Rules for full details, but key points to consider are:**

- That the gas being consumed, to which your consumer is matching their RGGOs, has been withdrawn from the same Distribution Network into which the Green Gas (represented by the RGGOs), was injected. That means consumers cannot be located in Iceland, Jersey, or another location that is not connected to the UK gas pipeline network. However where there is “continuous connection between the UK gas grid and a gas grid in an EU, EFTA, or EEA member state,”¹⁹ RGGOs can be allocated to End-use consumers consuming gas from those grids.

¹⁹ [Scheme Rule 9.4](#)

- If they are consuming LNG, then you are satisfied that the requirements outlined in the following section have been met.
- If you are allocating RGGOs to a tariff (or gas being supplied to vehicles at a particular filling station) and not an individual consumer, that this is clear, i.e. you name the tariff and/or indicate the RGGOs are being matched to “Gas Supplied” by the entity named.

NB: once RGGOs are Cancelled this cannot be reversed and details on a Cancellation Statement, such as the name of beneficiary, cannot be edited.

This is to protect the RGGO system against the risk of double counting via double allocation to consumers.

All contracts with Scheme Participants state that they “shall be responsible for all...Cancellation Requests [and] for the consequences for all such requests” and “nor shall the Scheme Administrator [REAL/GGCS] be liable for any losses arising from any inaccuracy or incompleteness of such...action [s]” (Producers Clause 4.4, Traders/Account Holders Clause 4.8).

We urge all Scheme Participants to put in place the strongest possible checks on their Cancellation processes to protect against errors.

You should be aware that for the purpose of our own auditing, the GGCS may ask you to provide information on the identity of your End-Use Consumers and the purposes for which they have been allocated RGGOs.

The current, widely accepted, categories of End-Use Consumers of RGGOs are:

- Companies taking part in voluntary GHG emission reporting schemes, e.g. the CDP.
- Companies making claims of green gas use for external marketing purposes (outside the scope of a formal emissions reporting scheme).
- Companies with internal GHG emissions strategies.
- Domestic households and business customers who are on a green gas tariff.
- Companies using green gas as a vehicle fuel (which may be supplied via a green gas tariff).

If the End-Use Consumer you are allocating RGGOs to does not match one of these examples, then you may wish to discuss the details of that End-Use Consumer with the GGCS Administrator, to ensure that you will be complying with the terms of your letter agreement and the Scheme Rules.

21.3 Subsidy or Obligation Claims

GGCS, or any biomethane registry to which RGGOs may be transferred, do not guarantee in any way that RGGOs entitle their owners to make claims within any national or regional support scheme, meet national or regional obligations or the reduce reported emissions within the UK or EU Emission Trading Schemes. Any claims within support scheme or obligations are at the discretion of the regulators of those schemes.

Scheme Participants should make their counterparties aware of this fact.

RGGOs will be labelled to show if Production Support or Investment Support has been received by the Producer.

21.4 Transferring RGGOs to other biomethane registries

NB: you must not attempt to allocate RGGOs to an account in another biomethane registry via a Cancellation. All transfers of RGGOs to other registries must be conducted in accordance with GGCS Guidance Document 7.

21.5 Confidentiality

Please note that we “will keep confidential...all data that is placed on secure areas of the Registration Database by the Producer, save that the Scheme Administrator may disclose aggregated and anonymised figures relating to the number of RGGOs and the volumes of Biomethane in respect of which RGGOs have been issued, transferred and cancelled pursuant to [the Scheme]”²⁰. This means that we will not, without your permission, share the names of the End-Use Consumers you are allocating RGGOs to. We may, however, provide general information related to the sectors of End-Use Consumers involved and the purposes for which they purchase RGGOs. In any audit we undergo that may give the auditor access to information on the names of End-Use Consumers, the auditor will be bound by the same confidentiality clause.

21.6 Illustrative examples of naming End-Use Consumers (Beneficiaries)

This section provides some illustrative examples that can help you understand how the above guidance can be put into practice.

(a) Example 1 – End-Use Consumer identified

You enter as the Beneficiary: **Acme Warehouse Ltd (Company Number 012345)**

Acme Warehouse Ltd (Company Number 012345) then appears in the Beneficiary field on the Cancellation Statement.

You provide this Cancellation Statement to Acme Warehouse.

Acme Warehouse and its sustainability auditors, when assessing the GHG emissions from its gas use, can identify that Acme Warehouse have been allocated the RGGOs listed on the Cancellation Statement (they are the Beneficiary) and verify the Cancellation Statement via the URL on that statement. Acme Warehouse is then able to make the appropriate claims around its consumption of green gas and [related GHG emissions](#).

(b) Example 2 – End-Use Consumer is *not* your direct customer but *is* identified

You are working with a gas supplier who is not a GGCS member, Liverpool Energy Ltd, to allocate RGGOs to one of its customers, an End-Use Consumer, Acme Warehouse Ltd.

²⁰ See your letter agreement with the Scheme Administrator for the full clause.

You may issue the Cancellation Statement as in Example 1, identifying Acme Warehouse as the End-Use Consumer. However, if Liverpool Energy Ltd wish to be acknowledged on the Retirement Statement, the following example could be used:

You enter into the Beneficiary field: **Acme Warehouse Ltd (Company Number 012345)**

You enter into the “Cancellation Purpose” field: **cancellation for customer of Liverpool Energy Ltd**

You pass this Cancellation Statement to Liverpool Energy and it is passed on to Acme Warehouse, who consumed gas from the same Distribution Network into which the Green Gas that the RGGOs relate to was injected and meet the definition of an End-Use Consumer.

Acme Warehouse and its sustainability auditors, when assessing the GHG emissions from its gas use, can identify that Acme Warehouse is the Beneficiary of the RGGOs listed on the Cancellation Statement and validate the Cancellation Statement via the URL on the statement²¹. Acme Warehouse is then able to make the appropriate claims around its consumption of green gas and [related GHG emissions](#).

(c) Example 3 – End-Use Consumer is a group of households and/or businesses on a green gas tariff offered by a third party

You are working with a gas supplier who is not a GGCS member, Liverpool Energy Ltd, to supply RGGOs to a group of their customers who are on a green gas tariff.

You enter into the Beneficiary field: **Liverpool Energy Ltd (gas supplied) Green Gas Tariff Q2 2020**

You provide this Cancellation Statement to Liverpool Energy, and they use it within their compliance processes to show that they have matched the gas use of customers on their green gas tariff to retired RGGOs.

It is clear to Liverpool Energy and its auditors that the Cancellation Statement does not relate to the gas consumption of Liverpool Energy, but to its customers. See section below on [green gas tariffs](#) for more details.

(d) Example 4 – End-Use Consumer is not identified and value of the Cancellation Statement is lost

You are working with a gas supplier, Liverpool Energy Ltd, who is not a GGCS member. They ask you to cancel RGGOs and allocate them to one of their customers, or a group of their customers, on a green gas tariff. You are not given details of the End-Use Consumer or group of End-Use Consumers.

You enter into Beneficiary field: **Liverpool Energy Ltd**

This Cancellation Statement will **not be of value in evidencing green gas use** by a Liverpool Energy Ltd customer. Instead you have allocated RGGOs to Liverpool Energy Ltd, indicating that gas consumed by Liverpool Energy, for example to heat their offices, will be reported as green gas.

If Liverpool Energy passed the Cancellation Statement on to their customer, Acme Warehouse, they would be unable identify themselves as the entity that had been allocated the RGGOs listed on the

²¹ You must have selected **Public Cancellation** during the cancellation process.

Cancellation Statement. Acme Warehouse is then unable to make any claims around its consumption of green gas and any reduced GHG emissions.

The Cancellation Statement may then be of little value to Acme Warehouse, and it is not possible for you to change the details in the “RGGOs allocated to” field or to reissue those RGGOs on a new Cancellation Statement, as they have been cancelled from the Registration Database.

22. GREEN GAS SUPPLY TO VEHICLES

You may wish to name the End-Use Consumer, being the operator of the vehicle, in the same way you would if that consumer were consuming gas for power or heat, for example:

You enter into the Beneficiary field: **Midlands Transport Group Ltd**

You can add in the Cancellation Purpose that it was: **Gas used as vehicle fuel**

Midlands Transport Group would then be able to show that the RGGOs listed on the Cancellation Statement belonged to it, and it could make appropriate claims about related emissions.

Another option is that a CNG filling station may offer a “green gas tariff” which is applied to some or all of its customers. In this instance the Cancellation Statement should name the party supplying the gas and specify that it was **gas supplied** to vehicles. For example:

You enter into the Beneficiary field: **Green Gas Fuels Ltd – Birmingham Station Ltd (supply to vehicles)**

You must specify that the gas has been **supplied** so that it is clear that it was not gas **consumed** by the gas supplier/station operator.

We encourage you to provide additional information which communicates details of the tariff. For example:

You enter into the Beneficiary field: **Green Gas Fuels Ltd – Birmingham Station (supply to vehicles) – 100% Tariff**

We recommend that you discuss with your End-Use Consumers which details would be most suitable.

23. RGGO WITHDRAWAL

The Scheme Administrator may withdraw RGGOs where we have information they were issued in error. If they are withdrawn, they will not be available to the holders of those RGGOs.

NB: Scheme Participants take at their own risk the possibility that RGGOs may be withdrawn.

Section 14 of the Scheme Rules gives full details on RGGO withdrawal, and a high-level summary is provided here:

- After issuing RGGOs the Scheme Administrator may become aware of errors in the Production Declarations related to those RGGOs, non-compliance with the requirements set out in Rule 3 (related to how Green Gas is defined) or information that would otherwise affect the details recorded in the RGGOs.
- Gas Producers are responsible for the accuracy of their Production Declarations, and they must inform the Scheme Administrator at the earliest opportunity of any information which may require RGGOs to be withdrawn.
- When we become aware of errors in Production Declarations the Scheme Administrator will, in the first instance, seek to correct errors in the information recorded in RGGOs, by attributing RGGOs issued in respect of the non-compliant injection towards a subsequent equivalent injection of compliant Green Gas by the relevant Gas Producer. We term this process as “balancing”.
- If such a correction is not possible or practical, the Scheme Administrator may declare the injection non-compliant and withdraw the affected RGGOs.
- Where the withdrawn RGGOs have already been retired and allocated to an End-Use Consumer, the Scheme Administrator will, as soon as reasonably practicable, notify the Scheme Participant who issued a Cancellation Request for the RGGOs. That Scheme Participant must notify the End-Use Consumer who has been allocated the RGGOs that those RGGOs have been withdrawn and verify that they have done this to the Scheme Administrator.
- Withdrawn RGGOs are not available to be transferred to other Account Holders or to be allocated to End-Use Consumers.

24. COMPLETING A DATA VERIFICATION STATEMENT (DVS)

Data Verification Statements (DVSs) must be completed to fulfil the requirements of clause 4.8 of the letter agreement between a Producer and the GGCS which states that:

*“The Producer must provide third party verification of the data submitted to the GGCS on an **annual basis** and agrees to make all records relating to participation in the Scheme available to the Scheme Administrator, or any person appointed by the Scheme Administrator to audit compliance with the Scheme, on request and within reason”.*

What is an “annual basis”?

A DVS must be submitted to cover each annual (12 month) period of biomethane production regardless of whether RGGOs have been issued for all biomethane production in that period²².

We expect members will align these annual periods with their NDRHI Annual Sustainability Reporting or Green Gas Support Scheme (GGSS) Annual Sustainability Reporting period, which will vary between members depending on commissioning dates.

If not aligned with that reporting period, then the reporting period will start on the “production start date” of the first bundle of RGGOs issued to a Gas Producer²³.

After the submission of your first DVS that covers a full year, we consider that the “annual basis” has become fixed, and the relevant deadlines will be set against that cycle unless otherwise agreed with the Scheme Administrator.

DVSs must be completed within three months of the end of the selected verification period e.g. if the RGGOs and production period being verified runs from 01/04/2024 to 31/03/2025, you must submit your DVS by 30/06/2025.

If you do not submit your DVS by the deadline, then we will stop issuing any new RGGOs until your DVS is submitted and we have confirmed that it verifies the accuracy of previously issued RGGOs.²⁴

If no DVS has been submitted by 1 month after the deadline (being 4 months after the end of the compliance cycle), then we will apply our Sanction Policy and escalate the level of sanctions until a DVS is supplied. This might lead to your account being locked and, ultimately, the termination of your participation in the GGCS and the potential of legal action taken against your company for failure to fulfil your letter agreement obligations.

You must submit your DVS by having its author (being the independent third party) email it to info@greengas.org.uk. When the Scheme Administrator has confirmed that we are satisfied it verifies your GGCS activity, then we will upload it the **Documents** section of your GGCS account. We will contact you if we require any clarification or any action is needed to remedy any errors it identifies.

²² Assuming that RGGOs have been issued for at least 1 quarter of the 12 month period. If no RGGOs have been issued then no DVS will be required until such point that a Production Declaration is made.

²³ The “first bundle of RGGOs” is identified by the chronology of the biomethane production, not the date the RGGOs are issued.

²⁴ The DVS must have been provided at the point that the Scheme Administrator issues the RGGOs and it is not material if the Production Declaration was submitted before the deadline.

You must also provide:

- your NDRHI Annual Sustainability Report or GGSS Annual Sustainability Audit Report; and
- your Annual Feedstock Declaration (if you are required by Ofgem to produce one); and
- any new Fuel Measurement and Sampling Questionnaire (FMSQ) you have agreed with Ofgem.

24.1 DVS can also be completed to facilitate the GGCS in issuing RGGOs in advance of an NDRHI or GGSS payment being made for a specific gas injection, or where NDRHI or GGSS payments will not be applied for.

Any DVS completed for this purpose can then be updated as needed at the end of a year to fulfil the annual verification requirement.

The Production Declaration provides space for producers to explain why NDRHI or GGSS are not being applied or why they have not been received at the point of the declaration being made.

24.2 Completing a DVS to facilitate a RGGO transfer to another biomethane registry

Other biomethane registries may require that RGGOs have been checked by a third party before they are transferred. That DVS may not yet have been conducted according to the annual compliance cycle but can be commissioned outside that cycle so that RGGOs become eligible for transfer.

See Guidance Document 7 for full details.²⁵

24.3 Who can complete a DVS?

The DVS author must be a person who is:

- Independent of your company and the GGCS.
- Qualified to understand the information they are verifying e.g. experience of GHG calculations and biomethane plant operations.
- Without an internal conflict i.e. if they also provide any other related services to you such as managing your NDRHI and GGCS activity, then they must deliver the service of completing your DVS through a separate entity with a clear division of responsibilities.

Any party with a track record of conducting NDRHI ASRs or GGSS ASARs will be deemed to meet criteria a) and b). If they are not the same person completing your NDRHI ASR or GGSS ASAR then they can provide us with a short statement on their independence and qualifications.

24.4 Guidance for DVS authors

The GGCS has designed a DVS Template which should allow DVS authors to efficiently verify data submitted by biomethane producers to the GGCS and the RGGOs we have issued.

²⁵ <https://www.greengas.org.uk/news/ggcs-guidance-documents>

Ensure that DVS authors have downloaded the template directly from the GGCS website (www.greengas.org.uk/news/ggcs-guidance-documents) each time they complete a DVS to ensure that they are using the latest version of the template.

This guidance provides information on the template and sets out our expectations of how it should be completed. The template itself contains comments which provide details on how particular fields can be completed. Please contact the GGCS (info@greengas.org.uk) at any point to discuss any aspects of the process that are not clear.

24.5 Verification Principles

Producers submit ‘self-reported’ evidence to the GGCS on a quarterly basis about the volume of biomethane they have injected which is deemed to be the ‘Eligible Heat Output’ under the NDRHI or GGSS²⁶. This evidence is a combination of screenshots from the NDRHI or GGSS Register and biomethane to feedstock apportionment tools e.g. the Ricardo GHG calculator.

The DVS must verify the primary data behind this evidence, ensuring that the RGGOs we have issued are in line with the meter readings, feedstock to gas apportionment, and the GHG calculations provided to support them.

If DVS authors find that RGGOs have not yet been issued for the period they are being asked to verify, then the Producer must first create and upload a Production Declaration for the amount of gas they have injected during this period. This declaration will contain all available evidence from the NDRHI or GGSS register and of Feedstock-to-Gas apportionment. This can be done before any NDRHI or GGSS payment is made.

The DVS author can then assess these Production Declarations and confirm the values in them (noting they must access these files by downloading them from a G-REX account as they will be the same files used by the GGCS Administrator to issue RGGOs).

Otherwise, any RGGOs which have already been issued on the GGCS database must be verified by directly accessing it. The Producer should add DVS authors as a user to their GGCS G-REX account (see section 28.9 below).

24.6 Material and immaterial differences between “RGGOs issued (kWh)” and “Calculated and Verified Total from Gas data (kWh)”

(a) Material differences

Quarter by Quarter the “RGGOs issued” value must match with the Producer’s “Calculated and Verified total from the gas data” being the Eligible Heat Output (EHO) under the NDRHI or GGSS (accounting for any deductions made for ineligible feedstocks, and other adjustments that are made to payments but do not show in the EHO).

A variation of 1 kWh is allowed as RGGOs are issued per kWh and gas data can be measured to one decimal place and rounding differences may therefore occur per quarterly claim.

²⁶ If there are any discrepancies between amounts injected and Eligible Heat Output under the NDRHI or GGSS, for example if a producer has injected more than their accredited capacity, please contact info@greengas.org.uk to discuss how this can be accounted for in the DVS.

Any variation greater than 1 kWh, between the total number of “RGGOs issued” in each quarter and the total “Calculated and Verified total from the gas data” in each quarter is a material issue.

(b) Immaterial differences

There can be small variances in the feedstock to gas apportionments used to identify the number of waste, residue, and product RGGOs to issue for each quarter vs the apportionments used for the DVS, either because of minor updates to the values used or because the number of decimal places used was different.

Any variance that equates to less than 1% of the total RGGOs issued for that quarter is immaterial. Above that threshold the variance is material and the GGCS may choose to withdraw RGGOs or require a balancing action. In the example below 7,500,000 kWh of RGGOs have been issued for the quarter, so the materiality threshold would be 7,500 kWh (7,500,000/100). As the differences are only 1,000 kWh, they are not considered material.

Example of immaterial differences

Quarter ending	Energy Source label	Calculated and Verified Total from Gas data (kWh)	RGGOs issued (kWh)	Difference (kWh)
March 2020	Classification (Product)	2,499,000	2,500,000	1,000
March 2020	Classification (Residue)	2,500,000	2,500,000	0
March 2020	Classification (Waste)	2,501,000	2,500,000	1,000
	Total	7,500,000	7,500,000	0

24.7 Initial vs Additional NDRHI/GGSS Capacities

If a Producer has additional NDRHI or GGSS capacity (i.e. Maximum Additional Capacity or MAC), then they will add the kWh of EHO produced under that capacity to the EHO of their Maximum Initial Capacity (MIC) and RGGOs will be issued for the combined amount.

The DVS should therefore verify the plant’s activity across both NDRHI/GGSS accreditations with both NDRHI/GGSS numbers recorded.

Dates of quarterly production used should reflect those from the original NDRHI/GGSS accreditation. We recognise that additional NDRHI accreditations are given mismatched dates that do not reflect the dates of meter reading or feedstock use.

24.8 GEMINI data

A key aspect of the DVS is that the DVS author views primary data on total gas injected by the Producer and ensures that it matches their calculations of their EHO, and the “self-reported” evidence submitted

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each quarter that supported the RGGO issuing. This data must be from the [GEMINI system which is operated by Xoserve](#) and is held independently from the plant's systems. The plant will not be able to access GEMINI data directly but will have access to a portal/account operated by their Gas Shipper where this data is displayed. DVS authors must not rely on screenshots, or copy and pasted data, provided by the plant.

Data on kWh injected by Producers into the National Transmission System (NTS) can be accessed via the [National Gas website](#).

DVS authors must view this data either by:

- Logging into an online gas shipping portal;
- Receiving screenshots or copy and pasted data directly from the Gas Shipper via email;
- An in-person meeting with someone who has access to the portal; or
- A screen share with someone who has access to the portal²⁷.
- Via <https://data.nationalgas.com> (if the Producer is injecting into the NTS)

The Gas Shipper portal may have a function to show total kWh injected between two dates, in which case those values can be matched to the plant's records. If this function is not available, then a sample of daily readings should be matched to the plant's records. *The GGCS recommends that at least two daily readings from each month are sampled so that all production periods are covered*²⁸.

The DVS author must record in the "Evidence Reviewed" section that they have directly viewed the GEMINI data. We recommend explaining the process used in the notes section.

24.9 Accessing primary data on pending or issued RGGOs

It is essential that DVS authors access primary data on which RGGOs have been issued. They can do this via a screen share with the Producer or they can ask to be added as a user to the Producer's G-REX account.

We recommend DVS authors are assigned two roles as a G-REX User:

1. GGCS Biomethane AH Account Viewer; and
2. AH PD Editor.

This will allow the DVS author to view data without being able to add or remove other users, or transfer or cancel RGGOs.

To see a record of previously issued RGGOs:

²⁷ We do not require that a site visit be conducted to complete a DVS, and we recommend a screen share as the most convenient method to verify gas injection data.

²⁸ Data will often be copied and pasted from a Gas Shipper Portal into a Producers records each month, so it is important to check daily readings from different parts of the quarter, checking each months data entry. Sampling a day from each fortnight of production is recommended and would result in 24 data points/year sampled, which we believe can be done in a reasonable amount of time.

- select the **Accounts** tab;
- select **Certificate Transactions**; and
- filter **Transaction Type** to show **Issuing**.
- Filter **Production Device Name** to show the relevant plant (there may be more than one within the account being viewed)

There is no longer a technical pending status, but any Production Declaration submitted where RGGOs are yet to be issued are considered to be “Pending RGGOs” as that Declaration will form the basis for a future issuing of those RGGOs. Therefore if a DVS author is conducting a DVS on “pending RGGOs” so that they can be issued pre-NDRHI/GGSS payment, then they must check the Production Declaration.

To review a Production Declaration, log into the relevant G-REX account and:

- select **Plants**;
- select the plant in question;
- select **Documents**; and
- download the relevant **Production Declaration**.

24.10 Other guidance

The DVS template has comments in key cells and a Guidance and Glossary tab.

25. INFORMATION SHARED ABOUT YOUR PLANT AND GAS PRODUCTION

When you open an account on the GGCS system, and register gas injections, you share a range of information with the GGCS.

Confidentiality clauses are included in the letter agreements in place with all Scheme Participants and information is only shared for specific purposes.

You should be aware that sharing information about your plant and your gas injections, in the form of RGGOs, is the core purpose of the Scheme.

25.1 Information on Gas Producers

Plant names, locations, GGCS account codes, and potential feedstock use, are displayed publicly here: www.greengas.org.uk/certificates/producer-information.

GGCS also holds information on the following characteristics that are shared when RGGOs are traded and appear on Cancellation Statements:

- Commissioning dates, which we will take to be start of the first quarter of gas production registered on the GGCS;

- GGSS/NDRHI numbers;
- Production capacity; and
- If investment support was received for the development of the plant (which for NDRHI and GGSS accredited plants, will always be no).

25.2 Information on gas injections

When Gas Producers register the gas they inject, the RGGOs issued contain the following information:

- kWh of biomethane produced;
- The start and end date of production period;
- If production support was received and which type;
- The classification of the feedstock used e.g. Product, Residue, Waste;
- The quality and/or sustainability criteria that were met e.g. NDRHI or ISCC;
- GHG thresholds met; and
- Any other data that is part of a Production Declaration e.g. use of negative GHG credits for manure use, information on Voluntary Schemes and Proofs of Sustainability.

After they have been issued, RGGOs and the information they contain, may be:

- Transferred to other GGCS Scheme Participants inside and outside the UK;
- Sold to End-Use Consumers inside and outside the UK; and
- Transferred to other biomethane registries outside the UK.

In each of those cases, the information regarding gas injections will be shared with further parties. In the case of transfers to other biomethane registries, this includes the operator of those registries and their scheme members.

Contractual agreements between the GGCS and other biomethane registries to enable transfers will always include confidentiality clauses. This ensures that even when information is shared with other biomethane registries, it is only available to their scheme auditors, and the scheme members and consumers who take ownership of the transferred RGGOs.

26. DESCRIBING GREEN GAS SUPPLY AND THE BENEFITS OF RGGOS AND GREEN GAS TO END-USE CONSUMERS

Members must pay due regard to our Scheme Rules on marketing green gas.

Rule 21.3. states that “Scheme Participants must be honest and transparent when marketing Green Gas to End-Use Consumers [and]...they should not claim that the allocation of RGGOs represents the physical supply of Green Gas to an End-Use Consumer. Where appropriate the process of issuing, transferring, and cancelling RGGOs should be explained”.

Rule 21.1. states that “Scheme Participants should take a conservative approach in making any claims that their purchase or sales of RGGOs, and payment of fees to the Scheme, create any additionality in the amount of Green Gas being produced”.

And Rule 21.2 states “they should pay due regard to any guidance on additionality claims published by the Scheme which are made available on the Scheme website”.

These rules apply to gas consumption for heat, power or transport, and for individual consumers, or those that are part of tariffs.

GGCS Guidance Document 21 on the Environmental Benefits and Impacts of Biomethane is available [here](#) and is intended to support members in appropriately marketing green gas.

27. MATCHING RGGOS TO LNG CONSUMPTION

It is the responsibility of GGCS members to understand the nature of gas consumption by End-Use Consumers that will be named on Cancellation Statements. You should be aware if your consumers are withdrawing gas from a gas grid or receiving it in liquid form as LNG²⁹.

GGCS Scheme Rules clause 10.2 states that, in relation to End-Use Consumers, “the gas they have consumed must have been withdrawn from the same Distribution Network into which the Green Gas, represented by the RGGOs they have been allocated, was injected”.

If gas is being provided to consumers as Liquefied Natural Gas (LNG) then it is important to consider if this rule has been met.

For the purposes of the Scheme Rules a Distribution Network is defined as a “system for transporting gas from a Gas Producer to an End-Use Consumer. Distribution Networks include the NTS, GDN, gas transportation infrastructure operated by IGTs (whether or not connected to the NTS or a GDN) and systems of distribution via bottles and tankers that form a distinct network”.

In order to conform with these requirements, any LNG consumption being matched to biomethane injection via RGGOs must either be:

- 1) LNG produced from the liquefaction of gas taken from the UK gas grid (or connected gas grid).**

or

- 2) LNG sourced from a facility which is connected to the UK gas grid or the connected gas grid of an EU, EFTA or EEA country.**

If LNG is sourced from a facility which is connected to the UK gas grid, or the grid of a connected EU/EFTA/EEA country, then it will almost certainly be delivered to that facility from a source unconnected to the Distribution Network into which the biomethane was injected, for example Qatar. However, the LNG terminal will be connected to the Distribution Network into which the biomethane was injected, through the infrastructure that regasifies the LNG and places it into the grid.

The view of the UK government’s Department for Transport (DfT) is that, because of this type of connection, it considers the Isle of Grain LNG terminal to “form part of a grid system” (DfT, 2020) and that renewable fuels can be mass balanced from injection in a gaseous form into the grid, to withdrawal in a liquid form from the Isle of Grain LNG terminal and its subsequent distribution to transport use.

As mass balancing is a more stringent chain of custody than the ‘adapted’ book and claim methodology required by the GGCS, then we consider it appropriate to allow RGGOs to be matched to LNG sourced from the Isle of Grain LNG terminal and equivalent facilities.

If the DfT position changes, then the GGCS will review its position and update this Guidance Document accordingly.

Where LNG consumption is from a source which is not connected to the UK transmission or distribution system, or the transmission or distribution system of a surrounding country, then RGGOs should not be allocated to the consumer in question.

²⁹ Liquefied Natural Gas

LNG sourced from this type of facility would not be considered as gas withdrawn from the same Distribution Network into which the Green Gas that our RGGOs are issued for was injected.

The exception to this would be if it could be shown that the LNG delivered to this kind of facility came from an LNG facility that was connected to the same Distribution Network into which the Green Gas that our RGGOs are issued for was injected, i.e. LNG that was reloaded from the Isle of Grain. However, this is very unlikely as this type of reloading is limited.

GGCS members should be aware that the Scheme Administrator may ask them to explain and evidence how they have determined that allocation of RGGOs to LNG is appropriate according to the GGCS Scheme Rules and this Guidance Document.

GGCS members should be aware that the Scheme Administrator may update the Scheme Rules and/or this guidance document in the future which may affect their ability to allocate RGGOs to LNG consumption.

The GGCS implements its Sanction Policy in any instances where it believes this guidance has not been followed.

28. INTERACTION OF RGGOS AND PROOF OF SUSTAINABILITY DOCUMENTS E.G. ISCC

Biomethane producers and traders participating in the GGCS may also wish to become certified under a Voluntary Scheme recognised by the European Union, the most common of which is the International Sustainability and Carbon Certification Scheme (ISCC)³⁰. This is allowed under ISCC's and GGCS's rules but this guidance must be carefully considered, and Scheme Participants must disclose information to the GGCS about their activity within ISCC to ensure that no double counting takes place.

(a) RGGOs and PoS – Double Counting Risk

Parties that are ISCC certified can generate and transfer Proof of Sustainability (PoS) documents that capture the value of units of biomethane in a similar way to Renewable Gas Guarantees of Origin (RGGOs).

Because both Schemes offer a route to capture and sell the value of units of biomethane, steps must be taken to ensure that there is no double counting or double sale of biomethane.

This guidance sets out the steps that we require GGCS members to take and what information we may request from you in relation to your activity under the ISCC Scheme.

Double counting is fraud and failure to have read and understood this guidance will not be considered by GGCS to be a mitigating circumstance if it is found to have occurred.

All information about ISCC in this guidance is based on the GGCS's understanding and should be verified against information published by ISCC or provided by an ISCC certification body.

This guidance also contains information about how the GGCS and ISCC relate to the UK Renewable Transport Fuel Obligation (RTFO) and the issuing of Renewable Transport Fuel Certificates (RTFCs). You should refer to the RTFO guidance and contact the Department for Transport (DfT) to confirm any information within this document.

(b) Getting Certified under ISCC

The ISCC Certification process is separate from your participation in the GGCS, and you should contact one of the Certification Bodies listed on the ISCC website to explore the process in detail.

If you become ISCC Certified the GGCS requirements are that:

- you notify the GGCS by emailing info@greengas.org.uk.
- you keep a record of the ISCC PoS that you generate and who you transfer them to and those records should show which bundles of RGGOs they have been matched to (more details below).
- the chains of custody evidenced by the PoS must match the RGGOs chains of custody.

³⁰ This guidance will refer to ISCC – the same guidance applies if you take part in ISCC-EU or ISCC-Plus or any other equivalent scheme e.g. REDCert.

(c) What is a Proof of Sustainability (PoS) document?

- A PoS can be any format of document that records information about a biomethane consignment related to its sustainability e.g. feedstock used, origin of feedstock, GHG calculation, in a way that meets ISCC's requirements.
- ISCC provide templates which have developed over time, so you may see a range of formats, but they will have the same information within them. They may be Excel files or PDFs.
- Unlike GGCS RGGOs, which are issued and transferred within an electronic database, PoS are generally individual Excel or PDF files that are generated by producers and traders themselves and transferred via email, although use of an electronic database is possible e.g. <https://trace-your-claim.com/>.

(d) What is the purpose of a PoS?

- **To support RTFC claims.** ISCC is a “voluntary scheme” recognised by the European Commission and the UK government as being a system that can evidence that a biofuel (such as biomethane) has met the requirements of the Renewable Energy Directive (RED), in relation to its sustainability and as part of the evidence that a mass balance has been completed. Therefore, biomethane producers who are selling their gas to parties who are claiming Renewable Transport Fuel Certificates (RTFCs) will likely be required to provide a PoS.
 - o Further information on Voluntary Schemes can be found here: https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en.
- **To provide assurance to consumers that biomethane has been produced sustainably.** All GGCS RGGOs contain details of the sustainability criteria that the biomethane production has met, which in almost all cases is the UK's Non-domestic Renewable Heat Incentive's (NDRHI) or Green Gas Support Scheme (GGSS) sustainability criteria. However, these criteria are not well known (particularly outside the UK) and are not designed as a public facing assurance system for gas consumers. Whilst the ISCC criteria are not necessarily “stricter”, ISCC is a well-known brand across Europe and offers assurance on the sustainability of a range of bio products. Therefore, we have seen consumers, particular those based outside the UK, request that they are supplied with RGGOs from a producer who is ISCC certified and then may also want to see that a PoS has been issued for the biomethane they have been sold.
- **The purpose of a PoS is not consumer disclosure i.e. they are not a generally accepted method for evidencing that a consumer has purchased/been supplied with units of biomethane.** This should be done via a Guarantee of Origin (GoO) system such as the GGCS's RGGOs. This distinction is established in the Renewable Energy Directive (RED) and within GHG reporting methodologies such as the GHG Protocol. Key differences between RGGOs and PoS underly this difference in use being:

- ISCC PoS are not generally issued into electronic databases;
- there is no function to cancel and allocate them to consumers and;
- they lack some key information such as if subsidy (Production Support) was provided to the producer.

(e) What is the purpose of a GGCS RGGO?

- A RGGO is a tool for *consumer disclosure*, being the regulatory term for how consumers should evidence they have used renewable energy when sourcing energy from the grid and not directly from a generator.
- The first RED set out the principles of GoO for electricity and RED II, which came into force in June 2021, expands their scope to all renewable energy types including green gas. While no longer an EU member, the UK continues to follow the principles set in RED both in the issuing of Renewable Electricity Guarantees of Origin, and its support for market based instruments³¹.
- RGGOs may be used to report the use of biomethane in a Scope 1 market based GHG inventory. Note that acceptance of the use of RGGOs to disclose biomethane use is at discretion of an auditor (where one is being employed) – more information is available here - <https://www.greengas.org.uk/certificates/emissions-reporting>

(f) Double counting – further information

Both PoS and RGGOs are instruments by which you can “sell” biomethane to other parties and therefore there is risk of double counting.

Double counting is fraud and undermines the credibility of the market for renewable energy.

You will declare during the ISCC process, and it will be checked during the audit, that you are not double counting your biomethane and, if found to be, you will permanently lose your ISCC Certification.

The GGCS will require you to share any PoS documents you issue with us. If we find you are double counting your biomethane by selling the same units to two different entities (via the two different schemes) we will take action against you under the terms of our letter agreement.

Biomethane producers should also consider if the discovery of such double counting would affect their ability to claim the RHI or GGSS from Ofgem.

³¹ “The Government remains committed to the use of market-based measures, domestically and globally, to support our ambitious net zero and environmental targets” <https://www.gov.uk/government/consultations/voluntary-carbon-and-nature-markets-raising-integrity>. Because of the UK’s exit from the EU it did not implement an official framework for Renewable Gas Guarantees of Origin although it may do in the future

(g) What would double counting/double sale look like?

An example for a producer:

- 1) You produce one unit of biomethane.
- 2) You create an ISCC PoS and sell it to person X. They may or may not use it to claim an RTFC.
- 3) You are issued a RGGO and sell it to person Y. They use it to claim their boiler is using green gas.
- 4) The single unit of biomethane is being counted once by X and second time by Y.

Note that the use of a PoS by person X to claim RTFCs is not material. Any kind of sale for any purpose, that duplicates the sale of the same unit of biomethane by any other means is a form of double counting (also referred to as double sale).

An example for a trader:

- 1) You receive RGGOs and a PoS representing the same units of biomethane.
- 2) You transfer the RGGOs to trader X.
- 3) You forward the PoS to trader Y – naming them as the recipient.
- 4) These units have therefore been sold twice.

Other examples may include issuing two PoS for the same units of biomethane.

(h) Whistleblowing

If you have any concerns that double counting is occurring, then you can use the GGCS whistleblowing policy outlined in this document to bring details of these concerns to our attention.

We also encourage you to contact ISCC – <https://www.iscc-system.org/contact/> – to raise your concerns.

(i) Using PoS and RGGOs in a complementary way (while avoiding double counting)

Your counterparty needs you to “sell” them biomethane. This is not possible simply by transferring ownership of your gas on the wholesale gas market e.g. GB National Balancing Point, which does not make any reference to fossil vs renewable.

The sale of biomethane therefore conducted via an instrument such as a RGGO or a PoS, and by providing your counterparty with ***both items*** they can:

- a) (Via the PoS) show compliance with the requirements of the RTFO on sustainability and mass balancing, allowing them to claim RTFCs.
- b) (Via the PoS) be given assurance of the biomethane sustainability beyond that offered by the RHI or GGSS sustainability criteria

- c) (Via RGGOs) disclose to their customers e.g. vehicles operators, that they have been supplied with biomethane and for that party to be able to report their biomethane including being able to cancel the certificates and provide information on production and investment support provided to the producer.

At every step, the chains of custody evidenced by the PoS must match the RGGOs chains of custody.

In the future the GGCS intends to develop its system so all the information required for mass balancing and the details required regarding sustainability can be included in a RGGO. At that point you will still need to be ISCC certified, but you will no longer need to issue the PoS as Excel or PDF files and all information can be transferred electronically.

(j) What is an RTFC?

- A Renewable Transport Fuel Certificate (RTFC) is a Certificate that is issued when a volume of renewable fuel has been supplied to the transport market. It can be used by required parties to show they have met their obligation under the RTFO. It is issued on a registry operated by the Department of Transport called ROSlite. It is **not** a Certificate that can be used for consumer disclosure and does not represent units of fuel delivered because you are often given double awards for using waste based feedstock.
- Biomethane producers are unlikely be involved in the ROSlite system and be issued with an RTFC. Their involvement will most likely be to sell biomethane to an intermediary via PoS and RGGOs.

(k) Claiming an RTFC

- In order to be awarded with an RTFC you must show you have supplied (using the fuel duty point as the proxy) an eligible fuel to a vehicle.
- While it is possible to directly deliver biomethane to a vehicle e.g. directly from a gas upgrading unit, the majority of biomethane award an RTFC is delivered via the grid using the concept of mass balancing.
- Anyone wishing to mass balance via the grid should be sure they understand the requirements of this methodology and we recommend reading:
 - o the ISCC website: <https://www.iscc-system.org/certification/chain-of-custody/mass-balance/>
 - o the RTFO guidance: <https://www.gov.uk/government/collections/renewable-transport-fuels-obligation-rtfo-orders>
- Mass balancing requires the tracking of units of biomethane between different owners without any double counting and RGGOs can help evidence this process.

- Because RGGOs contain information on whether the RHI was paid or not, they offer assurance to the DfT during RTFC claims that there is no double subsidy.
- However, RGGOs do not hold all the information needed to prove the sustainability of a unit of biomethane and we are not a recognised scheme for doing so:
 - o See further information on Voluntary Schemes:
https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en

(I) What is the value of a RGGO when matched to a PoS and transferred to a counterparty who is claiming RTFCs?

When you sell RGGOs in the open market (without reference to an RTFC claim or any PoS being issued), potential competition to secure those RGGOs exists between almost every gas consumer in Europe for any use (power, heat, or transport).

In the transport market, where a RGGO must be matched to PoS chain of custody, which is being linked to an RTFC claim, it must follow a chain of custody that goes from your plant to a fuel duty point in the UK. There will be a limited number of gas consumers being supplied with fuel from that duty point and they may or may not be willing to pay a premium on the fuel costs and to be provided with RGGOs that will allow them to report they have used biomethane.

Therefore, the value of the RGGO may differ between the two types of transactions.

29. GREEN GAS TARIFFS

This guidance is relevant to GGCS members who have gas supply licenses and are offering a green gas tariff i.e. they are committing to matching a percentage of their customers gas use to cancelled Renewable Gas Guarantee of Origin (RGGOs).

The Fuel Mix Disclosure process governs how renewable electricity tariffs must be evidenced by energy suppliers, but does not as yet cover the offer of green gas tariffs. Therefore, there is no governmental or regulatory oversight of these tariffs at present, unless a supplier is applying for an exemption from the Green Gas Levy.³²

The GGCS aims to support high standards and best practice, and requires our members to be transparent and honest in the way they offer green gas tariffs to their customers. This section of guidance sets out our expectations of how green gas tariffs should be offered and backed up by RGGOs.

This will allow us to provide assurances to our members and other stakeholders that steps are being taken to monitor green gas tariffs and ensure that the market is functioning properly.

29.1 Describing Green Gas “Supply”

GGCS members should be clear in their marketing material that their tariff matches customers’ gas consumption to Green Gas injected into the grid and should not suggest that any physical quantities of green gas will be delivered to customers.

GGCS members should pay due regard to our guidance on additionality as published on our website: [Additionality - Certificates - Green Gas Certification Scheme](#).

We recommend that GGCS members describe their use of the GGCS (and other registries, if applicable) and the concept of a Guarantee of Origin (GoO) in matching customers gas consumption to green gas being injected into the grid.

29.2 Process for meeting advertised tariff commitments

GGCS members should continuously track their customers’ gas use and calculate the amount of RGGOs they will need to cancel to meet the commitments they have made e.g. if a supplier is advertising that a tariff is 10% green gas then they should calculate 10% of their customers’ gas use and cancel RGGOs equivalent to that amount.

We recommend that GGCS members cancel RGGOs throughout a compliance period e.g. quarterly, to avoid any unforeseen circumstances that may occur at the end of the period (assumed to be annual).

To allocate RGGOs to a tariff they must be cancelled, and the details of the tariff must be stated in the **Beneficiary** field of the generated Cancellation Statements. It must be made clear that the RGGOs are being matched to customers gas use and not to gas used in the operations of the supplier e.g. it should state “Gas supplied to customers of Liverpool Energy Supply Ltd – Q1 2020” and not simply “Liverpool Energy Supply Ltd”.

³² Where a supplier supplies 95% or more biomethane to all its domestic consumers using RGGOs as evidence they receive an exemption from the Green Gas Levy – more information here - <https://www.gov.uk/government/publications/green-gas-levy-ggl-rates-and-exemptions/exemptions-from-the-green-gas-levy-ggl-approved-biomethane-certification-schemes>

Holding RGGOs in an account does not constitute the meeting of a tariff commitment and no claims should be made on that basis. If those RGGOs are held for three years and three months from the production end date, they will expire without having been allocated to a tariff.

29.3 What information will the GGCS request?

To ensure our members are behaving in a transparent and honest way we will conduct an annual tariff survey³³.

We expect our members to have a robust internal process of monitoring the commitments within their green gas tariffs and will ask for information related to:

- a. Customer numbers
- b. Percentage of green gas being offered
- c. Internal or external compliance processes

29.4 What other compliance process should be put in place?

We are aware of instances where tariffs are being externally assessed and suppliers may wish to integrate an assessment of their green gas supply with their Fuel Mix Disclosure of renewable electricity.

Neither of these actions are a requirement of the GGCS Scheme Rules, but we suggest that members consider implementing similar procedures.

29.5 Consequences of not following our guidance on Green Gas Tariffs

GGCS members who we believe have failed to fulfil their obligations under our letter agreements and Scheme Rules or have failed to pay due regard to our guidance documents, are subject to our Sanction Policy.

Members who are in material breach of the Scheme Rules or letter agreements may have their participation in the Scheme terminated immediately.

Actions short of a material breach may result in the GGCS triggering the three months 'no fault' termination clause.

Where a member is the holder of a gas license in the UK and we have reason to believe they are in breach of their license conditions (see box below), we may notify Ofgem.

³³ We may conduct this survey more frequently when tariffs are new or there are additional risk factors we have identified.

0.3 The Standards of Conduct are that the licensee and any Representative:

a) behave and carry out any actions in a Fair, honest, transparent, appropriate and professional manner;

b) provide information (whether in Writing or orally) to each Domestic Customer which:

i. is complete, accurate and not misleading (in terms of the information provided or omitted);

ii. is communicated (and, if provided in Writing, drafted) in plain and intelligible language with more important information being given appropriate prominence;

iii. relates to products or services which are appropriate to the Domestic Customer to whom it is directed;

iv. in terms of its content and in terms of how it is presented, does not create a material imbalance in the rights, obligations or interests of the licensee and the Domestic Customer in favour of the licensee; and

v. is sufficient to enable the Domestic Customer to make informed choices about their supply of gas by the licensee;

Clause 0.3 of the Gas Supplier standard license conditions

www.ofgem.gov.uk/licences-industry-codes-and-standards/licences/licence-conditions

30. MAKING CONTACT WITH OTHER SCHEME PARTICIPANTS

The G-REX system does not have any function for you to share your contact details or view the contact details of other members. GGCS is not involved in the commercial arrangements of its members and cannot offer any broking or introductory services.

31. USING THE GGCS LOGO

We are happy for our members to use our logo and can supply a hi-resolution jpeg version of it upon request.

Please note that the letter agreement contains the following clause:

4.7 The Producer agrees to use the Scheme logo in accordance with the Scheme Administrator's guidance issued from time to time. The Producer agrees not to use the Scheme logo in any manner that is not authorised by the Scheme Administrator's guidance, without the prior written consent of the Scheme Administrator.

31.1 Guidance for using the GGCS logo

Please follow normal good design practice including:

- Good spacing from borders and other images and logos; and
- Ensuring the image is of a suitable resolution.

You should avoid making any misleading claims when using our logo and describing your participation in the Scheme. Specifically, membership of the GGCS is not evidence that your organisation or gas has been certified to a particular standard beyond the evidence you provide to Ofgem via the NDRHI.

31.2 Suggested Phrasing

Where you are looking to describe your involvement in the GGCS alongside our logo suggested phrases include:

- XXXXXX is proud to be part of the Green Gas Certification Scheme, which ensures the green gas we produce/supply is securely tracked through the supply chain, eliminating double counting and misleading claims from the marketplace.
- The Green Gas Certification Scheme tracks units of green gas through the supply chain, removing the potential for double counting and eliminating misleading claims from the marketplace.
- The green gas we sell is tracked via the Green Gas Certification Scheme which ensures a secure supply chain with no double counting of green gas production or consumption.

32. MAKING A COMPLAINT

All complaints made to GGCS should be addressed in writing to the REAL CEO, Virginia Graham: virginia@realschemes.org.uk.

This policy applies to complaints made to the GGCS regarding:

- decisions taken to withdraw or amend RGGOs;
- the application of sanctions according to the scheme policy;
- decisions taken on whether to accept or reject applications to participate in the GGCS;
- the behaviour of REAL staff; and
- any other decisions taken in the course of the scheme process.

The REAL CEO will consider and respond to complaints unless:

- the complaint is against their actions, or relates to or has an impact on status of RGGOs or a Cancellation Statement, in which case they will refer the complaint to the Compliance Committee; or
- they wish to refer the complaint to the Compliance Committee.

The complaint may also be discussed at the Oversight Panel at the request of the Compliance Committee or the REAL CEO.

GGCS responds to all complaints as quickly as possible, and in any event no later than within ten working days of their receipt. GGCS aims to resolve all complaints in as timely a manner as possible and will inform complainants, and any other relevant party, of the outcome of its investigation as soon as reasonably practicable following its determination.

If as a result of a complaint GGCS determines that an incorrect RGGO was issued, the GGCS will issue a correction and notify relevant parties of the change, including providing an explanation for the change.

All enquiries related to a complaint will be conducted independently of any personnel who may be involved in the subject of the complaint.

32.1 Appealing the application of a sanction

Making a complaint is a distinct process to appealing the application of a sanction, although both processes can be applied simultaneously.

Appeals against sanctions should be made according to the Sanction Policy (see section below).

33. WHISTLEBLOWING

We aim to run an open and transparent Scheme. Consequently, it is fundamental that any concerns which external parties may have about suspected malpractice within GGCS, either by the Scheme Administrator or Scheme Participants, are aired.

To this end, we have devised a policy and procedure to cover the airing of genuine concerns which you may have about suspected malpractice within the Scheme.

For any concerns related to the activities of a Gas Producer or a licensed Gas Shipper or Supplier you should also consider if your concerns should be raised with Ofgem via their whistleblowing process. For more details see: <https://www.ofgem.gov.uk/about-us/transparency/whistleblowing>.

This policy applies to companies and individuals that have dealings with the GGCS such as:

- GGCS Scheme Participants (being organisations that have signed letter agreements with REAL) including their employees and ex-employees.
- Employees or ex-employees of organisations who are not GGCS Scheme Participants, but are involved in biomethane regulation and trading such as employees of Ofgem or brokers and commodity traders.
- Corporate End-Use Consumers under the GGCS Scheme Rules, including their employees or ex-employees and individual End-Use Consumers who are part of a green gas tariff.
- Employees of the Association for Renewable Energy and Clean Technology (REA).³⁴

Malpractice includes, but is not confined to:

- conduct likely to prejudice the standing of GGCS;
- breaches of internal rules and regulations;
- criminal offences or breaches of civil law;
- endangerment of the health and safety of any person;
- environmental damage; and
- the deliberate concealment of any malpractice.

If you raise a malpractice concern, you will be taken seriously and will be treated fairly and justly.

In any cases where we believe individuals are deliberately raising false and malicious allegations the Scheme's Sanction policy may be applied and legal action considered.

³⁴ REA and Renewable Energy Assurance Limited ("REAL") operate separate whistleblowing policies in respect of malpractice in the workplace.

33.1 Confidentiality

REAL takes the issue of maintaining confidentiality seriously and will make every effort to ensure the whistle-blower's identity is kept confidential and only disclosed to a limited group of people as appropriate, given the nature of your disclosure.

REAL will not disclose the whistle-blower's identity to the company or individual about whom a concern has been raised without the whistle-blower's consent. However, REAL is unable to guarantee confidentiality in all cases. **For example, where:**

- the nature of REAL's enquiries makes it possible to identify the whistle-blower; or
- REAL is required by law to disclose information which would enable the whistle-blower to be identified (for example, if a relevant court order to do so is made).

33.2 Procedures

(a) Raising a concern

If you have a malpractice concern, you should inform REAL on info@greengas.org.uk.

If you feel you need to take advice before doing so, you may contact the independent charity, Protect, on 020 3117 2520. They provide free, confidential legal advice on whistleblowing matters.

(b) What steps we will take

Following receipt of your telephone call, letter, or email alleging malpractice, REAL will acknowledge the concerns raised and will log the information provided.

As soon as possible the Scheme Manager and the REAL CEO will consider: the information you have provided, the implications for the Scheme, and if further investigation is needed. Unless the concern involves the Scheme Director, they will be appointed as your contact person for the case and the REAL CEO will remain aware of all communications. In exceptional circumstances the chair of the GGCS Compliance Committee will support the Scheme Director in handling the case.

REAL would not normally encourage whistle-blowers to proactively obtain any further information from any source. However, we may ask whistle-blowers to clarify or supplement the information they have provided.

After a full investigation is conducted the Scheme Director will communicate the findings to the whistle-blower, the GGCS Scheme Participant under investigation, and, if appropriate, those members of GGCS management or external authorities who need to consider whether action should be taken.

Any complaints you have about the way your concern is being treated will be dealt with via our complaints procedure (see section 12).

34. SANCTION POLICY

This chapter sets out the Scheme’s policy for sanctioning Scheme Participants who breach the terms of their letter agreement, the Scheme Rules or fail to follow guidance issued by the Scheme Administrator. Unless stated otherwise, capitalised terms in this document have the same meaning as set out in the Definitions Schedules to the letter agreement and Scheme Rules.

This guidance forms part of the Scheme’s management system and gives Scheme Participants a clear understanding of the sanctions they may face and the process by which any sanctions would be implemented.

The procedures set out in this guidance are pursuant to the Scheme Administrator’s powers, duties and responsibilities set out in the Scheme Rules and letter agreements it has signed with Scheme Participants.

34.1 Identifying non-compliance

Instances of non-compliance may be identified through:

- the Scheme Administrator’s ongoing monitoring of Scheme processes e.g. submission of Data Verification Statements, Gas Producers attempting non-compliant gas registrations, or Account Holders failing to name End-Use Consumers on Cancellation Statements;
- audits carried out for the purposes of the NDRHI and GGSS and provided to the Scheme;
- the annual external audit or the quarterly internal audits conducted or commissioned by the Scheme Administrator;
- verification processes undertaken by the Scheme Administrator such as visits to Gas Producers;
- whistleblowing by other Scheme Participants; and
- any other means.

34.2 Process for applying sanctions

The Scheme Director will report non-compliance to the Compliance Committee³⁵ and recommend an official warning or sanction to be applied to a Scheme Participant³⁶

The Compliance Committee will consider the details of the non-compliance against the criteria set out in this policy. They may agree with the sanction level proposed by the Scheme Director or decide to select another sanction level.

When reaching a decision, the Compliance Committee will seek a consensus on the sanction level to apply. Should a consensus not be achieved then the Committee will vote. The decision will be made by a simple majority.

³⁵ Capitalised but not included in the Definitions Schedule of the letter agreement and Scheme Rules.

³⁶ Apart from where the sanction relates to the late submission of a Data Verification Statement where the Scheme Director will proceed to issue warnings and sanctions according to a timeline that has already been agreed with the Compliance Committee.

When a sanction level 1, or an official warning is issued, then the Compliance Committee’s quorum will be the same as the quorum set in the Committee’s terms of reference³⁷. In any split decisions the deciding vote will be cast by the REAL Chief Executive if present and, if not, by the Committee Chair.

When the sanction level is 2 or above, then the quorum will be expanded to include the REAL Chief Executive who will cast the deciding vote in any split decisions and the Compliance Committee will take advice from the Scheme’s legal representative on whether they consider a “material breach” of the letter agreement to have occurred.

The REAL Board retains ultimate responsibility for the governance of the Scheme. Therefore, the REAL Chief Executive retains the authority to withdraw the responsibility of the Compliance Committee to take decisions on sanctions and refer such decisions to the REAL Board.

34.3 Timings

Application of sanctions will generally be decided at the quarterly Compliance Committee meeting, and we will seek to inform the Scheme Participants to which they apply within 10 working days of such meetings. The Compliance Committee may choose to hold additional meetings where necessary or to discuss the application of sanctions by email. We will seek to inform members within 10 working days of such additional meetings of any sanctions that have been applied to them.

Where the sanction relates to the late submission of a Data Verification Statement then sanctions will be applied in relation to the timing of the deadline and delays in submission beyond that date.

34.4 Appeals

Should an official warning be issued, or a Level 1 sanction applied, a Scheme Participant may choose to appeal the decision and will have 10 days to notify the Committee of its intention to do so. Appeals must be submitted in writing via email to the Scheme Director at least two weeks before the Committee’s next quarterly meeting, the date of which will be communicated to the Scheme Participant. Should the Committee wish to discuss the appeal in advance of the next quarterly meeting a timeline for submitting their appeal will be agreed with the Scheme Participant.

As part of any application of a Level 2 sanction, or above, the Scheme Participant involved will be requested to present its position to the Committee and formally comment on the decision, which may include an appeal to have the sanction level reduced.

The Committee will endeavour to give the Scheme Participant 10 working days to present its position and provide details of any appeal (which should be received in writing) before the sanction is formally applied.

However, the Scheme retains its rights under the letter agreements in place (which if any party considers in conflict with this policy takes precedence over this policy) to trigger termination of the agreements at any point, which may be before any appeal is received or discussed. For example, in applying a Level 2 sanction, the Scheme may wish to notify the Scheme Participant immediately that the 90-day remediation period has been triggered and then any appeal would take place during that time.

You may refer to the table below showing the sanction levels.

³⁷ Three people including at least the Scheme Director, the Chair, and a REAL board member.

Sanction Level	Sanction	When might this level be selected?
<p>Official Warning (previously referred to as a Level 0 Sanction)</p>	<p>Non-compliance is discussed by the Compliance Committee but no measures against the Scheme Participant are deemed necessary.</p> <p>The Scheme Participant will be informed that they have received an Official Warning and reminded that this increases the chances of a Level 1 or above sanction being applied in future non-compliance cases.</p>	<p>When a Gas Producer is more than 1 month late in submitting their Data Verification Statement.</p> <p>When a Gas Producer makes a mistake in their Production Declaration.</p> <p>Where the Compliance Committee considers that that the non-compliance was the result of human error and not negligence.</p> <p>Where the Scheme Participant showed willingness to make any necessary corrections in a timely manner.</p> <p>Where the non-compliance did not lead to any significant negative outcomes for the Scheme.</p> <p>Where the participant has not had any sanctions or warnings applied in the past.</p>
<p>1</p>	<p>The Scheme Participant will be informed they have breached the terms of the letter agreement, the Scheme Rules or failed to adhere to guidance, and are expected to put measures in place to reduce the risk that this will occur in the future.</p> <p>The Scheme Participant may be required to reimburse the Scheme for any costs incurred such as payments to the Scheme’s IT provider.</p> <p>The Scheme Director will assess the measures put in place to reduce risk of future non-compliance and report back to the Compliance Committee on such matters.</p>	<p>When a Gas Producer is more than 2 months late in submitting a Data Verification Statement.</p> <p>When a Gas Producer has made repeated mistakes in their Production Declarations.</p> <p>Where the Compliance Committee considers that non-compliance was unintentional, but due to negligence.</p> <p>Where the non-compliance resulted in, or had the potential to result in, significant negative outcomes for the Scheme.</p> <p>Where the participant has received an official warning in the past.</p>
<p>2</p>	<p>The Scheme Administrator will give written notice to the Scheme Participant that they consider that there has been a material breach of their obligations of the letter agreement.</p>	<p>When a Gas Producer is more than 3 months late in submitting a Data Verification Statement.</p> <p>Where the Compliance Committee considers that the Participant was aware that their actions could cause non-compliance, for</p>

Sanction Level	Sanction	When might this level be selected?
	<p>The Scheme Administrator may lock the Producer or Trader account.</p> <p>The Scheme Participant will be notified that should the breach continue for 90 days, then the Scheme will consider applying a Level 3 sanction, being terminating the letter agreement and thus participation in the Scheme.</p>	<p>example where the Scheme Administrator had previously informed the Participant they were at risk of non-compliance.</p> <p>Where the non-compliance resulted in, or had the potential to result in, significant negative outcomes for the Scheme.</p> <p>Where the Participant has had one or more Official Warnings or level 1 sanctions applied in the past.</p>
2a	<p>In addition to the sanctions applied in level 2, the Oversight Panel will be made aware of the identity of the Scheme Participant who has been sanctioned and with consideration for the confidentiality required by the letter agreement, the nature of the non-compliance may be noted.</p>	<p>As in Sanction Level 2, but where additionally the non-compliance has <u>directly impacted</u> Scheme Participants which have been involved in RGGO Transfers with the sanctioned Scheme Participant.</p>
3	<p>The letter agreement between the Participant and the Scheme Administrator is terminated.</p> <p>At that point the participant would no longer be able to access their account on the Registration Database and the RGGOs held in their account would be disposed of by the Scheme Administrator at the instruction of the Scheme Participant (subject to such disposal being deemed by the Scheme Administrator to be compliant with the Scheme Rules and guidance documents).</p> <p>The Scheme Administrator may also, alongside of, or independently of, any decision to terminate the letter agreement, make a claim against the Scheme Participant, in accordance with Clause 6 of the letter agreement.</p> <p>Any application by that organisation to re-join the Scheme will only be considered after a period of six</p>	<p>When a Gas Producer is more than 6 months late in submitting a Data Verification Statement.</p> <p>When, having applied a Level 2 or 2a sanction and issued a written warning about possible termination of the letter agreement, the Compliance Committee, alongside the Schemes legal representative, determines that corrective measures have not adequately been applied by the Scheme Participant and it is still in breach of its letter agreement.</p>

Sanction Level	Sanction	When might this level be selected?
	months, subject to a full review of their processes, staffing and management systems.	
4	<p>The Scheme Administrator will terminate the letter agreement according to Clause 7.1 of the letter agreement. After three months the letter agreement will no longer be in force.</p> <p>From the point of notifying the Scheme Participant of this termination the participant would no longer be able to access their account on the Registration Database and the RGGOs held in their account would be disposed of by the Scheme Administrator at the instruction of the Scheme Participant (subject to such disposal being deemed by the Scheme Administrator to be compliant with the Scheme Rules and guidance documents).</p>	<p>Where it is felt that Participant was aware that their actions could cause non-compliance, for example non-compliance in an area where specific guidance had been issued by the Scheme Administrator. Where the non-compliance resulted in, or had the potential to result in, significant negative outcomes for the Scheme. Where the participant has had one or more official warnings or level 1 sanctions applied in the past. Where in addition to the above (which are the circumstances under which a Level 2 sanction would be selected) the Compliance Committee does not foresee any circumstances whereby the Scheme would benefit from any further involvement of the Scheme Participant.</p> <p>When a Gas Producer is more than 6 months late in submitting a Data Verification Statement.</p>
4a	In addition to the sanctions applied in Level 4, the Oversight Panel will be made aware of the identity of the Scheme Participant which has been sanctioned and with consideration for the confidentiality required by the letter agreement, the nature of the non-compliance may be noted.	As in sanction Level 4 but where in addition the non-compliance has directly impacted Scheme Participants who have been involved in RGGO Transfers with the sanctioned Scheme Participant.

35. DEFINING THE SCHEME ADMINISTRATOR AND SCHEME PARTICIPANT RELATIONSHIP

The relationship of the GGCS with its members is defined across different documents which are outlined below.

NB: Members are referred to as Scheme Participants, Gas Producers, Traders or Account Holders in the letter agreement and rules.

35.1 Letter Agreement

This is a legal contract with clauses that cover subjects such as confidentiality, liability, and information sharing. It also includes a recognition that participants will abide by the Scheme Rules.

35.2 Scheme Rules

A current version of the Scheme Rules will always be publicly available on our website: <https://www.greengas.org.uk/governance/scheme-rules>. Members are obliged to follow the rules by their Letter Agreement. The rules are subject to change at the discretion of the GGCS; however, changes will go through a process of consultation with members of the Oversight Panel.

35.3 Registration Form

When completing the form, members will sign to say that:

- they have read and understood the Scheme Rules;
- the information they provide on the form is accurate and true; and
- they will inform GGCS of any changes to the details provided on the form.

35.4 Guidance Documents

In addition to the Scheme Rules, and the terms of letter agreements signed by Scheme Participants, the Scheme Administrator issues guidance documents. This allows Scheme Participants to make best use of the Scheme and ensure it is used in a way that encourages confidence and understanding of the Green Gas market (Scheme Rules clause 23.7).

In some cases guidance on particular subjects is referred to in the Scheme Rules and letter agreements and therefore should be considered binding on Scheme Participants. **Examples include:**

- Letter agreement 4.5 – Participants should follow guidance issued on use of the Scheme logo.
- Scheme Rules clause 8.1 – Gas Producers will make their Production Declarations in accordance with guidance issued by the Scheme.
- Scheme Rules clause 8.9 – the Scheme will publish guidance regarding exceptions to clause 4.5 on the issuing of other EACs alongside RGGOs.
- Scheme Rules clause 9.7 – Scheme Participants should pay due regard to any Guidance Documents issued by the Scheme in relation to Green Gas Tariffs.

- Scheme Rules clause 13.2 – guidance on transfer of RGGOs and other EACs between the GGCS and other Green Gas registries.
- Scheme Rules clause 16.2 – guidance on how the Registration Database calculates the expiry date (this is covered in this guidance document – see above).
- Scheme Rules clause 21.2 – Participants should pay regard to guidance on claims of additionality.

NB: whether it is referenced in the Scheme Rules or letter agreement or not, we expect members to take note of all guidance issued by the Scheme Administrator.

We will consult on the content of guidance and are happy to receive feedback. We are a member led scheme and your views will always be given serious consideration.

35.5 Oversight Panel

The Oversight Panel meets twice a year, and all GGCS Scheme Participants are automatically members of the Panel.

It considers the results of the audits and is consulted on rule changes and the setting of fees.

It adopts its own terms of reference which are available from the Scheme Administrator.