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# GGCS Guidance Document 2 – Trader User Guide

Guidance for GGCS users performing transfers and cancellations

Version 1.9

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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 Trader Account you will be able to:

- Transfer RGGOs to other GGCS Producers and GGCS Traders.
- Receive RGGOs into your account from GGCS Producers and Traders.
- Cancel RGGOs and allocate them to End-Use consumers<sup>1</sup>.

RGGOs will expire 3 years 3 months from when the gas production period they relate to ends<sup>2</sup>.

All account users should understand the effects of Cancelling Renewable Gas Guarantees of Origin (RGGOs), which allocates them to End-Use Consumers and that they are responsible for the accuracy of those Cancellations, which cannot be reversed or edited once made.

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

Account users should also understand the significance of how they name End-Use Consumers when cancelling RGGOs.

**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](mailto:info@greengas.org.uk).

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<sup>1</sup> We are now referring to RGGOs 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.

<sup>2</sup> This is a change from the previous Registration Database which calculated expiry from the first day 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. NAVIGATING G-REX – GETTING STARTED

### 2.1 Logging In

The login page for your account is: <https://grex.grexel.com/en/public/home> (see the following sections of this guidance on navigating G-REX).

The person nominated during your onboarding process will receive an invitation email from the [noreply@grexel.com](mailto:noreply@grexel.com) containing an account setup link and asking you to set password, and link the account to an authenticator app (the G-REX website suggests using the Microsoft Authenticator app).

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 set up your account, please contact the Scheme Administrator on [info@greengas.org.uk](mailto:info@greengas.org.uk) and we will be happy to assist.

### 2.2 Adding new users

Your primary account holder can add and remove users as needed.

When new users are added, they will receive an email from [noreply@grexel.com](mailto:noreply@grexel.com) with instructions of how to set up their account.

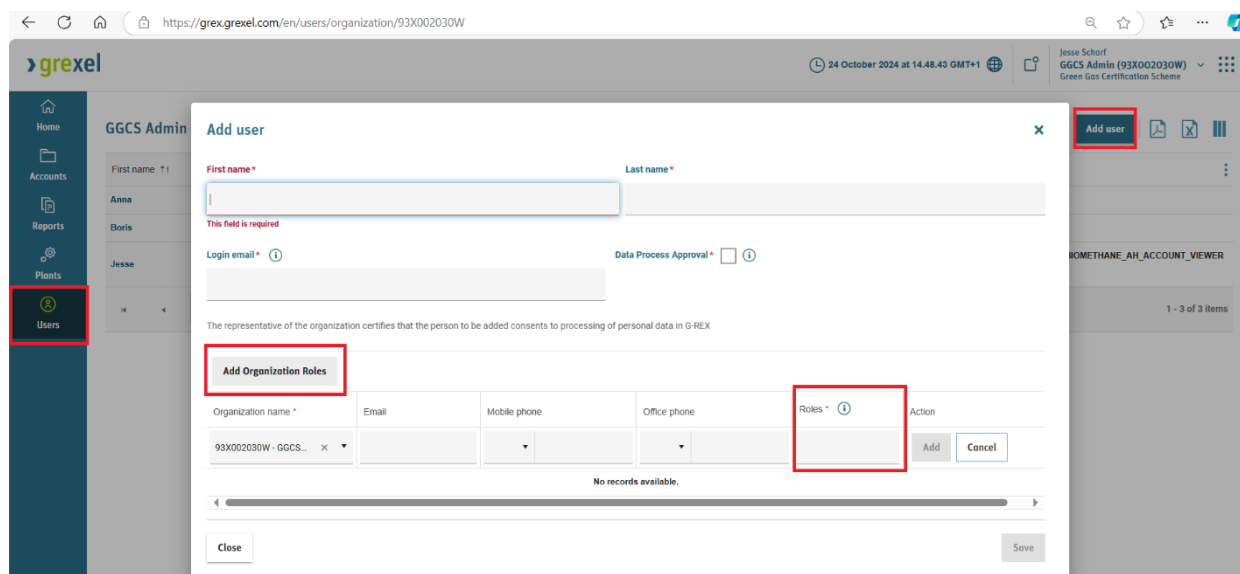
**NB: it is the responsibility of GGCS participants to keep track of who has access to their accounts, e.g. removing staff members when they leave their role.**

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.

The screenshot displays the G-REX user management interface. On the left, a sidebar menu shows 'Plants' and 'Users' (selected). The main content area is 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 a time field (day/month/year hour:minute); 'Production device name' (TEST DEVICE 22) and 'National ID'; 'Description' and 'Declaration types' (License declaration); 'Production device GSRN' (643002406493000034); 'End date time'; and 'Address' with fields for 'Street' (Test street), 'Zip code' (12934), 'City' (EXETER), and 'Country' (United Kingdom). At the bottom right, a copyright notice '© Grexel 2024' is highlighted with an orange box.

**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.**

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



## 2.3 Recommended role settings

Users can be given one 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.

### AH<sup>3</sup> 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”

Recommended for other users at an organisation. Users given this role 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”

Recommended for auditors or staff who need a “view only” role. This role will allow a User to see which RGGOs have been transferred and cancelled, while preventing them from initiating transfers or cancellations of RGGOs or adding or removing users.

<sup>3</sup> AH stands for Account Holder.

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

## 2.4 Using the API

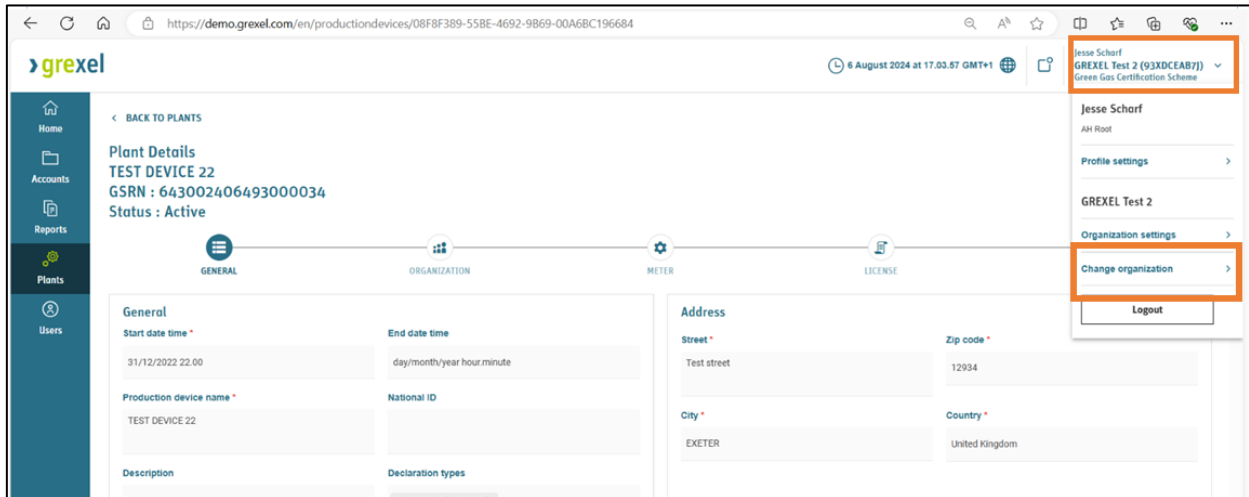
Every function in G-REX can be accessed using an Application Programming Interface (API). If Scheme Participants wish to use this function they take responsibility establishing the necessary processes. GGCS will supply you with the G-REX API manual on request ([info@greengas.org.uk](mailto:info@greengas.org.uk)).

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) numbers of G-REX users around Europe. For further support they offer a chargeable API integration service - [G-REX Integration](#).

### 3. NAVIGATING G-REX - ORGANISATIONS, SUB ACCOUNTS, AND PLANTS

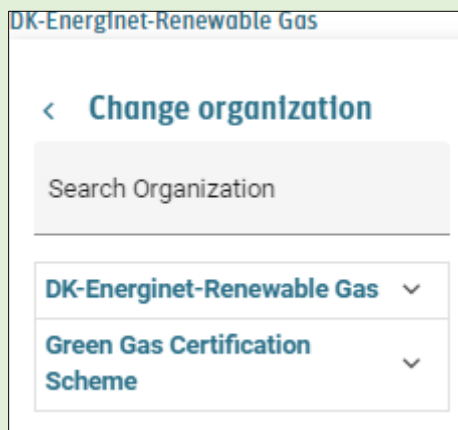
#### 3.1 Organisations

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).





### **3.2 Sub Accounts**

Within your account you can set up sub accounts (see below) for your 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.

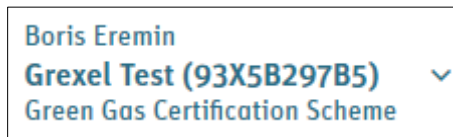
#### 4. NAVIGATING G-REX – HOME PAGE

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.

##### 4.1 Your G-REX Organisation ID

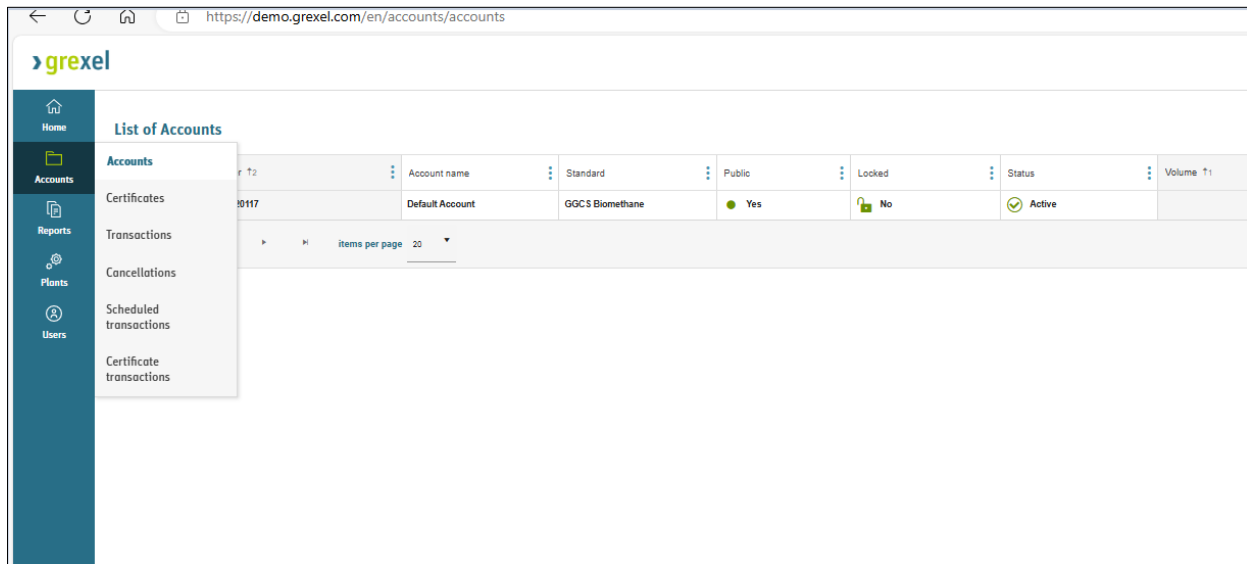
The top right hand corner of your account will show your **Organisation ID** in brackets:



This is your unique ID reference on the G-REX database and should be used when transferring RGGOs to other participants. Please be advised that you should cite this when making transfers to and from your account as opposed to your legacy **S0000** 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).

## 5. 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.

**Scheduled 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.





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## 5.1 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.

The screenshot shows the top right corner of the Green Gas Certification Scheme interface. At the top, there is a header with the date and time '21 August 2024 at 11:38:47 GMT+1' and the scheme name 'Green Gas Certification Scheme (93XIBGBOON)'. Below this, there is a toolbar with several buttons: 'Export Import', 'Clear all sortings', 'Clear all filters', 'Refresh grid', and a date range selector set to '21/05/2010 - 21/08/2024'. To the right of the date range are icons for a calendar, a document, a magnifying glass, and a list. Below the toolbar is a table with columns for 'Transaction type', 'Status', 'Volume', 'Unit', 'Standard', 'Sender', 'Receiver', and 'Transaction approval organization'. The table contains two rows of data, both with a 'Transfer' type and 'Completed' status. The first row shows a volume of 40,854,900 kWh, and the second row shows 39,265,191 kWh. The 'Sender' and 'Receiver' columns contain domain codes and account numbers.

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 &gt; 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>	

## 6. DATA LABELS WITHIN A RGGO BUNDLE

Renewable Gas Guarantees of Origin (RGGOs) are referred to as **Certificates** on the G-REX platform.

RGGOs have data fields that describe different characteristics of biomethane. Some of these fields are optional, so may not be completed for every RGGO bundle. If you do not see these labels then select the add or hide columns icon (three solid bars at the top right of the page) and to add or remove the columns you want.

Data Label	Description
<b>Volume (kWh)</b>	The number of kWh represented by the RGGO bundle. Each kWh is represented by a unique certificate number.
<b>Unit</b>	Will be kWh for all RGGOs.
<b>Issuing Body</b>	Will show as GB if the GGCS issued the RGGOs. If the RGGOs are imported, then it will show the country ID of the original issuing country.
<b>Energy Source Name<sup>4</sup></b>	<p>The Energy source is the biomass feedstock used to generate the biomethane (previously referred to as the “Biomass Information” label). The labels in use by the GGCS for UK produced biomethane are:</p> <ul style="list-style-type: none"> <li>- GGCS01 - Biomass (Unspecified) Classification (Product/Co-Product)</li> <li>- GGCS02 - Biomass (Unspecified) Classification (Residue)</li> <li>- GGCS03 - Biomass (Unspecified) Classification (Waste)</li> <li>- GGCS05 - Biomass (Unspecified) Classification (Mixed)</li> </ul> <p>Other labels may be used for imported RGGOs.</p>
<b>Technology Code</b>	Will always be G010000.
<b>Technology Name</b>	Will always be Anaerobic Digestion.
<b>Earmark</b>	This tells you if <b>Production Support</b> or <b>Investment Support</b> has been provided for the biomethane production.
<b>Production Device Name</b>	The name of the biomethane plant.
<b>GSRN</b>	A Unique ID for the biomethane plant.
<b>Operational Date</b>	The commissioning date of biomethane plant.

<sup>4</sup> Previously called the Biomass Information label.

Data Label	Description
<b>Trading Schemes</b>	Will always be “GGCS Biomethane RGGO”. If you have accounts on G-REX for a different registry, this can help you identify which domain you are in.
<b>Production Start and End Date</b>	Production start and end dates will match NDRHI or GGSS accreditation of the producer and not the dates of meter readings. Meter readings can vary +/- 3 days from accredited injection periods.
<b>Issue Date</b>	The date that the RGGOs were issued.

<b>Attributes – the following labels are listed as “Attributes” on G-REX.</b>	
<b>Capacity gas production</b>	<p>This the maximum flow rate of the biomethane producer as measured in kWh. A 5,000 kWh capacity is equivalent to 5 MW. That means it can produce up to 5 MW of biomethane per hour.</p> <p>The value is given based on the maximum potential of the biogas to biomethane upgrading equipment (and not the capacity of the injection point).</p>
<b>Subsidy or other criteria met</b>	<p>This label shows what quality criteria the biomethane production has met (where those criteria are not part of a Voluntary Scheme e.g. ISCC). Current labels in use are:</p> <ul style="list-style-type: none"> <li>- Green Gas Support Scheme (UK)</li> <li>- Non-Domestic Renewable Heat Incentive (UK)</li> <li>- Renewable Transport Fuel Obligation (UK)</li> <li>- naturemade (CH)</li> <li>- Unspecified</li> </ul>
<b>GHG Threshold Met</b>	<p>Certain quality criteria will include a GHG threshold that must be met. The values are measured in kgCO<sub>2</sub>e/MWh. Only the numerical value is show 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"> <li>- &lt; 86.4 (GGCS)</li> <li>- &lt; 118.44 (RTFO – post 05/10/2015 production sites)</li> <li>- &lt; 125.28 (NDRHI)</li> <li>- &lt; 152.28 (RTFO – pre 05/10/2015 production sites)</li> </ul>

Attributes – the following labels are listed as “Attributes” on G-REX.	
<b>Manure Credit Applied</b>	<p>When calculating GHG values within the GGSS or the RTFO, producers can apply a negative value for any manure used.</p> <p>The label may be “unspecified” but if the RGGOs have an actual GHG value in the (GHG Emission Produced label), then the RGGO will include information on if a Manure Credit was used.</p>
<b>Carbon Capture Credit Applied</b>	<p>When calculating GHG values within the NDRHI, GGSS, or the RTFO producers can apply a negative value for any carbon dioxide captured and removed from site.</p> <p>The label may be “unspecified” but if the RGGOs have an actual GHG value in the (GHG Emission Produced label), then the RGGO will include information on if a Carbon Capture Credit was used.</p>
<b>GHG Emissions Produced</b>	<p><i>Optional Label</i></p> <p>If producers wish to record the actual GHG value, they have the opportunity to here.</p>
<b>Sustainability Scheme</b>	<p><i>Optional Label</i></p> <p>If a producer is certified under a Voluntary Scheme, they can record which one here. The current options are:</p> <ul style="list-style-type: none"> <li>- ISCC-EU</li> <li>- ISCC-Plus</li> <li>- REDcert</li> <li>- Better Biomass</li> </ul>
<b>Sustainability Scheme Certification Start Date</b>	<p><i>Optional Label</i></p> <p>If a producer records they are certified under a Voluntary Scheme, they must provide the start and end dates of the annual certification and provide evidence in their Production Declarations.</p>
<b>Sustainability Scheme Certification End Date</b>	<p><i>Optional Label</i></p> <p>If a producer records they are certified under a Voluntary Scheme, they must provide the start and end dates of the annual certification and provide evidence in their Production Declarations.</p>
<b>Unique Number of Linked Proof of Sustainability (PoS)</b>	<p><i>Optional Label</i></p> <p>Producers can record the unique number of a Proof of Sustainability (PoS) certificate issued under their Voluntary Scheme certification which represents the same biomethane as the RGGOs.</p>



Attributes – the following labels are listed as “Attributes” on G-REX.	
	GGCS members must consult with their Voluntary Scheme auditor/certification body before using this feature.
<b>Link to Proof of Sustainability</b>	<p><i>Optional Label</i></p> <p>Producers can provide a URL which will direct to an online version of a Proof of Sustainability (PoS) certificate issued under a Voluntary Scheme certification which represents the same biomethane as the RGGOs.</p> <p>GGCS members will arrange their own file storage and hosting system and are responsible for the confidentiality and data security of that file.</p> <p>GGCS members must consult with their Voluntary Scheme auditor/certification before using this feature.</p>

## 7. 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.

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 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.

Transaction number	Transaction started	Transaction completed	Transaction type	Status	Volume	Unit	Stanzan	Sender			Receiver			Transaction approval organization
								Sender domain code	Sender name	Sending account number	Receiver domain code	Receiver name	Receiving account number	
2022081800000000	18/08/2023, 14.35	18/08/2023, 14.35	Transfer	Completed	30	MWh	EECS energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	
2022082400000000	24/08/2023, 5.46	24/08/2023, 5.46	Transfer	Completed	30	MWh	EECS energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	
20220824000000012	24/08/2023, 5.46	24/08/2023, 5.46	Transfer	Completed	60	MWh	EECS energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel Test3	64300240642000...	
2022083000000000	30/08/2023, 17.32	30/08/2023, 17.32	Transfer	Completed	6	000 MWh	EECS energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	
20220908000000013	08/09/2023, 15.08	08/09/2023, 15.08	Transfer	Completed	1	000 MWh	EECS energy gas	GR-GAS	Grexel AH	64300240642000...	GR-GAS	Grexel AH2	64300240642000...	
20240527000000024	27/05/2024, 11.54	27/05/2024, 11.54	Transfer	Completed	1	MWh	EECS 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

## 8. NAVIGATING G-REX - TRANSFERRING RGGOS

You have the ability to transfer your RGGOs to any other GGCS member, including the accounts of biomethane producers.

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 party<sup>5</sup>.

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

### 8.1 Process for Transferring RGGOs

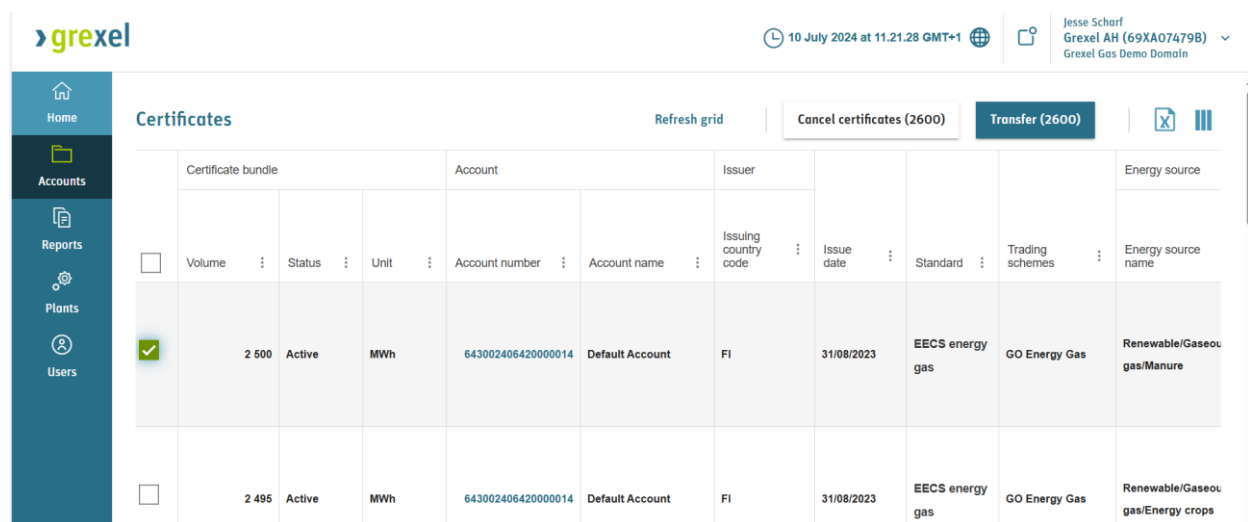
To see the RGGOs available for Transfer select **Accounts** and then select **Certificates**.

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** at the top of your screen.



Certificates											
Refresh grid   Cancel certificates (2600)   Transfer (2600)											
	Certificate bundle			Account		Issuer					Energy source
<input type="checkbox"/>	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	

<sup>5</sup> 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 \*

[Input field] [MWh]

**RECEIVER**

Domain \*  
Grexel Gas Demo Domain

Account Holder \*  
69XA07479B - Grexel AH [X]

Account \*

Enter account number/ member code ⓘ

Message to receiver ⓘ

[Text area]

**TRANSFER TIME**

Transfer now  Schedule transfer

[Close] [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** domain<sup>6</sup>.
- You should then select the **Account Holder** you wish to transfer the Certificates to. The Account field will populate automatically based on your selection<sup>7</sup>.
- 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

<sup>6</sup> If you are transferring RGGOs to accounts in other registries see Guidance Document 7.

<sup>7</sup> You can select yourself as the Account Holder and transfer the Certificates between your sub accounts with the Account option.

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 dimmed and shows the "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.

## 9. 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 Scheme Participants to put in place the strongest possible checks on their Cancellation processes to protect against errors.**

9.1 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 \* Location of beneficiary \*

United Kingdom ▼  

Cancellation purpose \* (i)

---

**CONSUMPTION**

Usage category \* (i)

Select ▼

Consumption period start \* Consumption period end \*

day/month/year (i) day/month/year (i)

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 <b>Volume</b> (amount) or <b>Percentage</b> of the selected bundles, or <b>Cancel all selected certificates</b> in those bundles.
Name of Beneficiary	You must name an End-Use Consumer as set out in the GGCS Scheme rules: <a href="#">Scheme Rules - Governance - Green Gas Certification Scheme</a> . Further guidance on the details you should enter into this field is provided in Section 11 of this document.  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 cannot leave this field blank, but you may enter n/a or *.
Usage Category	You must select <b>Cancellation – Disclosure</b> . 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 <b>Cancel now</b> or to <b>Schedule cancellation</b> for later.

Please see the following sections on naming end-use consumer, 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 Scheme Participants to put in place the strongest possible checks on their Cancellation processes to protect against errors.**

## 10. NAVIGATING G-REX - VIEW CANCELLATION STATEMENTS

To see 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 organic ID	Sending account number	Beneficiary name	Country of consumption	Consumption period start	Consumption period end	
<a href="#">202308100000031</a>	31/08/2023, 10.30	31/08/2023, 10.41	Completed	5	MWh	EECS energy gas	Grexel AH	69XA07479B	64300240642...	Test UK Ltd	United Kingdom	01/01/2023	31/12/2023	
<a href="#">202308100000032</a>	31/08/2023, 10.41	31/08/2023, 10.41	Completed	4	MWh	EECS energy gas	Grexel AH	69XA07479B	64300240642...	Test UK Ltd	United Kingdom	01/01/2021	31/12/2021	
<a href="#">20230927000000049</a>	27/09/2023, 16.13	27/09/2023, 16.14	Completed	1	MWh	EECS energy gas	Grexel AH	69XA07479B	64300240642...	Test UK Ltd	United Kingdom	01/01/2023	31/01/2024	
<a href="#">20240104000000014</a>	04/01/2024, 14.43	27/05/2024, 11.55	Completed	2	MWh	EECS energy gas	Grexel AH	69XA07479B	64300240642...	Test 1	Finland	01/01/2024	07/01/2024	
<a href="#">20240527000000038</a>	27/05/2024, 12.55		Pending approval from ID	50	MWh	EECS energy gas	Grexel AH	69XA07479B	64300240642...	Grexel 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 tradeable. onward 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>																							
<b>Transaction details</b> Transaction type: Cancellation Transaction number: 2023081000000031 Transaction started: 31/08/2023, 9.30 Public Statement: No				Status: Completed Volume: 5 MWh Transaction completed: 31/08/2023, 9.41 Standard: EECS energy gas				<b>From account</b> Organization name: Grexel AH Business ID: FB903842 Domain: Grexel Gas Demo Domain Account number: 6430024064200000038 Street: ZIP code: 00580				Organization ID: 69XA07479B Physical Person ID: Domain code: GR-GAS City: Helsinki Country: Finland				<b>Beneficiary</b> 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	Grexel Systems OY	F0101201	H070000	01/01/2023	31/01/2023	18/08/2023	GO Energy Gas													

## 11. NAVIGATING G-REX – BUNDLE BY BUNDLE TRANSACTION RECORD

To see a history of all the certificate transactions performed by the Account Holder, select **Accounts** and then **Certificate transactions**. This can be useful when you want to check what transactions (e.g. transfers, cancellations, or withdrawals) 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 ID	Certificate					Transaction										Attributes						
	Certificate number start	Certificate number end	Certificate volume	Status	Energy source name	Technology name	Production device name	Transac type	Transactk status	Transaction number	Transaction completion date	Sender organizz name	Receive organizz name	Capacit) gas producti								
<a href="#">31F11C64-7739-41E2-8735-CDF2F6B81CFB</a>	643002406493...	643002406493...	10 000	Active	Biomass (Wastewater) Classification (Waste)	Anaerobic digestion	Grexel Test			20240905000000001	05/09/2024, 9.39	Grexel Test	Grexel Test	1000								
<a href="#">AF9A0F50-CBE1-4224-B5A-C-AFEECCF425D</a>	643002406493...	643002406493...	600 000	Active	Biomass (Unspecified) Classification (Waste)	Anaerobic digestion	Grexel Test			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.

## 12. NAVIGATING G-REX - RGGO EXPIRY

The Scheme Rules state in clause 15.1 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 clause 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.<sup>8</sup>

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 11:59:59pm 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.**

### 12.1 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.

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<sup>8</sup> 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).

## 12.2 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.

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 organization ID
2024022000000006	23/09/2024, 1:00	23/09/2024, 1:00	Expiry	Completed	10 012 930	kWh	GGCS Stonefane	GB-GGCS			GB-GGCS			
2024022000000013	29/05/2024, 16:32	29/05/2024, 16:32	Cancellation	Completed	270	kWh	GGCS Stonefane	GB-GGCS			GB-GGCS			
2024012830211344	12/06/2024, 10:33	14/06/2024, 9:26	Transfer	Completed	2 461 882	kWh	GGCS Stonefane	GB-GGCS			GB-GGCS			
2024012830211345	12/06/2024, 10:33	14/06/2024, 9:26	Transfer	Completed	5 614 738	kWh	GGCS Stonefane	GB-GGCS			GB-GGCS			

### 13. 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.

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

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

#### 13.1 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.

#### 13.2 Our Scheme Rules and Guidance

You must be sure that you are naming an entity who 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,”<sup>9</sup> RGGOs can be allocated to End-use consumers consuming gas from those grids.

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<sup>9</sup> [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 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 emission 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.

### **13.3 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.

#### 13.4 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 carried out in accordance with GGCS Guidance Document 7.**

#### 13.5 Confidentiality

Please note that we “will keep confidential...all data that is placed on secure areas of the Registration Database by the Account Holder...save that the Scheme Administrator may disclose aggregated and anonymised figures relating to the number of RGGOs and volumes Biomethane in respect of which RGGOs have been issued, transferred and cancelled pursuant to this letter agreement.”<sup>10</sup>. 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.

#### 13.6 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.

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<sup>10</sup> 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 onto 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 are the Beneficiaries of the RGGOs listed on the Cancellation Statement and validate the Cancellation Statement via the URL on the statement<sup>11</sup>. 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 onto their customer, Acme Warehouse, they would be unable identify themselves as the entity that had been allocated the RGGOs listed on the

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<sup>11</sup> 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 Retirement Statement, as they have been cancelled from the Registration Database.

#### 14. 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.

## 15. 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 on the Environmental Benefits and Impacts of Biomethane is available [here](#) and will support members to market green gas appropriately.

## 16. 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 LNG<sup>12</sup>.

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.

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<sup>12</sup> 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.

## 17. 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)<sup>13</sup>. 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](mailto: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.

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<sup>13</sup> 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](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 instruments<sup>14</sup>.
- 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.

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<sup>14</sup> “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](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.

## 18. 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.

The GGCS aims to support high standards and best practice, and require 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.

### 18.1 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.

### 18.2 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 Cancellation Statements generated. 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”

No claims can be made based on RGGOs being held in a GGCS account. Holding RGGOs in an account does not constitute the meeting of a tariff commitment. If those RGGOs are held for 3 years and 3 months from the date of production, they will expire without having been allocated to your tariff.

### 18.3 What information will the GGCS request?

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To ensure our members are behaving in a transparent and honest way we will conduct an annual tariff survey<sup>15</sup>.

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

#### **18.4 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.

#### **18.5 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 to the scheme terminated immediately.

Actions short of a material breach may result in the GGCS triggering the three month '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.

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<sup>15</sup> 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](http://www.ofgem.gov.uk/licences-industry-codes-and-standards/licences/licence-conditions)

## 19. 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.

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

Section 14 of the Scheme Rules gives full details of 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 will 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.
- If such a correction is not possible or practical, the Scheme Administrator may declare the injection non-compliant and withdraw the RGGOs affected.
- 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.



## 20. MAKING CONTACT WITH OTHER SCHEME PARTICIPANTS

The system no longer offers you the chance 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.

## 21. USING THE GGCS LOGO

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

### 11.1 Guidance for using the GGCS logo.

Please follow normal good design practice including:

- Good spacing from borders and other images and logos
- 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.

### 21.1 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.

## 22. MAKING A COMPLAINT

All complaints made to GGCS should be addressed in writing to the REAL CEO, Virginia Graham – [virginia@recc.org.uk](mailto:virginia@recc.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 on if 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.

### **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 chapter below).

## 23. 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).<sup>16</sup>

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.

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<sup>16</sup> REA and Renewable Energy Assurance Limited ("REAL") operate separate whistleblowing policies in respect of malpractice in the workplace.

### **23.1 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).

### **23.2 Procedures**

#### **(a) Raising a concern**

If you have a malpractice concern, you should inform REAL on [info@greengas.org.uk](mailto: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).

## 24. 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.

### 24.1 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.

### 24.2 Process for applying sanctions

The Scheme Director will report non-compliance to the Compliance Committee<sup>17</sup> and recommend an official warning or sanction to be applied to a Scheme Participant<sup>18</sup>

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.

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<sup>17</sup> Capitalised but not included in the Definitions Schedule of the letter agreement and Scheme Rules.

<sup>18</sup> 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 reference<sup>19</sup>. 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.

### **24.3 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.

### **24.4 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.

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<sup>19</sup> 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><b>Official Warning (previously referred to as a Level 0 Sanction)</b></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><b>1</b></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><b>2</b></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 <b>in addition to the above</b> (which are the circumstances under which a Level 2 sanction would be selected) the Compliance Committee does not foresee <b>any circumstances</b> 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 <b>directly impacted</b> Scheme Participants who have been involved in RGGO Transfers with the sanctioned Scheme Participant.

## **25. 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.

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

### **25.1 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.

### **25.2 Scheme Rules**

A current version of the Scheme Rules will always be publicly available on our website. 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.

### **25.3 Registration Form**

When completing the form members will sign to say:

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

### **25.4 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 Rule 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 8.1 - Gas Producers will make their Production Declarations in accordance with guidance issued by the Scheme
- Scheme Rules 8.9 – the scheme will publish guidance regarding exceptions to rule 4.5 on the issuing of other EACs alongside RGGOs
- Scheme Rules 9.7 – Scheme Participants should pay due regard to any Guidance Documents issued by the Scheme in relation to Green Gas Tariffs

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

**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.

### **25.5 Oversight Panel**

The Oversight Panel meets twice a year and all members 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.