The REA,
80 Strand,
London WC2R 0RE

23rd August 2019

Dear Mike and Vincent,

Many thanks for circulating the draft table with examples of scenarios which set out whether compliance with G99 or G59 would be required. This is of particular interest to members of the REA's landfill gas group, as this category of renewable generators are more likely than most to be needing to make changes to their sites.

We had a presentation from Alan Guiver about the recent changes to G99 at meeting of Landfill Gas members on 16th July, and many of them have provided feedback and input which he has delivered directly to the group. We have also circulated the table.

There are over 450 landfill gas generation sites across the UK. They play a very important role in reducing fugitive methane emissions from landfill sites, and contributing baseload low-carbon renewable electricity to the grid. Most of these sites were commissioned during the late 1990s and early 2000's.

Landfill gas is a unique renewable resource in that its potential varies over time, typically increasing over a period of 10 – 15 years and then declining over a period which can extend to several decades. The half-life of the decline can range from 1 – 9 years, with an average of around just over 3 years. Getting the best out of these sites in terms of power generation requires operators to be flexible in their utilisation of generation assets, and anything which hinders this can be detrimental from the perspective of reducing GHG emissions.

Landfill gas generators therefore need to move their generation sets around, and match the capacity to the fuel resource as it declines. This typically involves moving G59 compliant engines from one G59 compliant site to another, and where the change is a like for like, or does not result in any change to the overall connection capacity we would not expect this to trigger a need to achieve G99 compliance. Indeed having this requirement could potentially curtail the contribution that landfill gas makes to the UK's renewable targets. This principle seems to be accepted, which we very much welcome and it is of the utmost importance it is retained. We would not support any proposals which stretch the DNO's willingness to adhere to this principle, or which undermine it.

Of course, landfill gas generators also look to optimise their existing generation entry capacity and may want to change fuels in order to achieve this. We accept that in

circumstances where new gensets are brought in, or generation capacity is increased, that a G99 requirement may be triggered.

We are somewhat confused by the wording of scenario 9, which refers to a combination of changing fuel source and an engine replacement. A change of fuel source change wouldn't of itself trigger G99 requirement, and this could be combined with a like-for-like change of engine as described above. If the change of engine is a replacement of one G59 engine at a G59 site, with another G59 compliant engine (as described in scenario 16) presumably this would not require G99 compliance?

It would also be useful to include a scenario where an existing G59 connection and an existing G59 installation (with no change to the registered capacity) are moved on the same site. There would be no change to the equipment or generation characteristics in this scenario, so there would be no requirement to be G99 compliant.

We would be happy to provide further information, if needed.

Once again, thank you for the opportunity to comment.

Yours sincerely,

Gaynor Hartnell,

Head of LFG and Transport Fuels, REA