

REA Response:

Proposals to extend NDRHI commissioning deadlines for existing tariff guarantee and extension application applicants

The Association for Renewable Energy & Clean Technologies (REA) is pleased to submit this response to the above call for evidence. The REA represents industry stakeholders from across the whole heat sector and includes dedicated member forums focused on green gas, biomass heat, biomass power, renewable transport fuels and energy from waste (including advanced conversion technologies). Our members include generators, project developers, heat suppliers, investors, equipment producers and service providers. Members range in size from major multinationals to sole traders. There are over 500 corporate members of the REA, making it the largest renewable energy trade association in the UK.

Do you agree with our proposal to extend TG2, TG3 and extension application deadlines for non-biomethane technologies by 12 months to 31 March 2023? Please explain your reasoning and include any evidence you think is relevant.

We are highly supportive of proposals from BEIS to extend the deadline for commissioning for eligible TG2, TG3 and extension applications from 31 March 2022 to 31 March 2023.

We are very happy that BEIS recognises the difficulty RHI projects have faced in recent months, due to several factors including disruption from the COVID-19 pandemic and related issues in renewable heating supply chains. We greatly welcome BEIS' decision to take these extenuating factors on board and provide an extension. We are also really grateful to the members who have helped us providing the evidence required to support the extension.

We support a 12 month extension as this should provide sufficient time to commission projects facing disruption. The REA was delighted to present evidence to BEIS officials on the need for tariff guarantee extensions and we are pleased that this evidence had been taken on board. Our members have also expressed great relief at these extensions, which will give the industry desperately needed breathing room in these unprecedented times.

Biomethane projects not eligible under the GGSS

Having said that, we believe **it is essential that the extension is also given to biomethane projects with TGs that will not be eligible under the Green Gas Support Scheme (GGSS).** Current BEIS proposals exclude these projects on the assumption they are eligible under the GGSS.

With members' support, we have provided evidence of at least three biomethane projects on the Scheme that are facing serious delays due to COVID or equipment supply chains. We are aware of at least three projects in these circumstances but there may be more.

These projects will be unfairly disadvantaged by the extension proposals as written, and we would urge BEIS to reconsider and provide these projects with an equivalent extension.

Finally, we are happy to assist with providing further evidence or clarifications if required.