Department for Transport

RTFO Verifier Information Event

13th January 2021

Overview of 2022 changes

Department for Transport

Overview

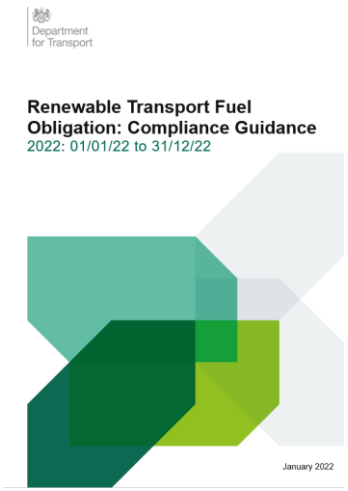
Legislative changes

- Amendments to the RTFO order consulted on in March 2021.
- Most changes (excluding RCFs and RFNBOs) have now been implemented and came into force from 1st January.
- The main changes are as follows:
  - New modes of transport: Maritime RFNBOs,
  - New multipliers for RFNBO ammonia and methanol
  - New fossil-fuel comparator and GHG thresholds
  - New forestry and soil carbon criteria to supplement the land criteria
  - New and updated default values
- The changes are broadly the same as REDII, but not identical

Guidance changes

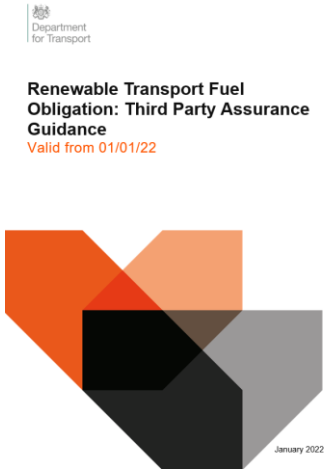
- New guidance has been drafted to reflect the legislative changes
- Guidance has been restructured to streamline user experience
- New requirements for biomethane

Guidance Restructure



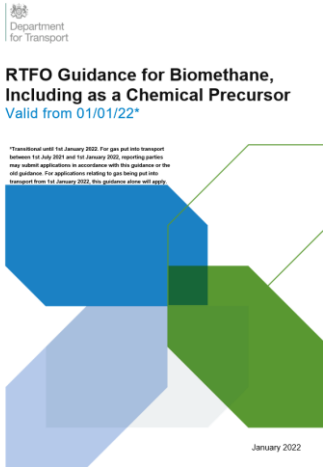
RTFO Compliance guidance

- Merger of the process and C&S guidance
- New Chapter 4 bringing together renewable fuel classification information
- Contains the key information for fuel suppliers to comply with the RTFO
- Should act as a one-stop-shop for those getting started with the RTFO



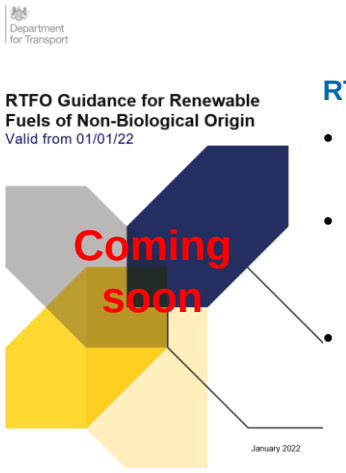
RTFO Third Party Assurance guidance

- Previous verifier's guidance, plus voluntary scheme recognition information
- Relatively little has been changed in the main text



RTFO Biomethane guidance

- Drafted in consultation with industry to deal with pipeline transport
- Supplements main compliance guidance for biomethane suppliers
- Mostly drafted by Sue Ellwood
- Requires new Pipeline (and other) transport information



RTFO RFNBO guidance

- **Not being released until January at the earliest!**
- Contains previous RFNBO methodology guidance, plus specifics on PPAs and additionality
- Suppliers will need to follow old guidance until published

Legislative changes (1)

Aspect	Previous (2021) provisions	Current (2022) provisions	Verifier implications
New modes of transport	Eligible transport modes are: road vehicles, non-road transports and aircraft	Eligible transport modes are: road vehicles, non-road transports (now including alternatively powered non-road vehicles), maritime/ships and aircraft	To be generally aware of, might see different types of documentation
Assessment times	Maritime RFNBOs: Not eligible Renewable hydrogen: Point of retail sale	Maritime RFNBOs: Point at which it is dispensed for use in a ship Renewable hydrogen: Point of sale	To be generally aware of
New multipliers for gaseous (and now liquid) fuels	• Methane: 1 kg is equivalent to 1.9 litres • Butane or propane: 1 kg is equivalent to 1.75 litres • Hydrogen: 1 kg is equivalent to 4.58 litres • Otherwise 1kg=1l	As before, with two new ones added: • RFNBO ammonia used in maritime: 1 kg is equivalent to 0.66 litres • RFNBO methanol used in maritime: 1 kg is equivalent to 0.7 litres	To be generally aware of – will be calculated in ROS
Multiple incentives	Fuels must not have been counted under another UK or EU support scheme.	Proposed changes didn't go ahead. Legal advice has clarified that it's the incentive not the target that matters, with new guidance in Chapter 6 of the main Compliance Guidance.	Must have declared on ROS that it didn't receive subsidy under another support scheme.

Legislative changes (2)

Aspect	Previous (2021) provisions	Current (2022) provisions	Verification implications
Fossil fuel comparator and GHG thresholds	Current fossil fuel comparator: 83.8 gCO2eq. Thresholds: • 50% for old installations (pre 05/10/15) • 60% for new installations (post 05/10/15)	Future fossil fuel comparator: 94 gCO2eq Thresholds: • 55% for biofuels from old installations (pre 05/10/15) • 65% for biofuels from new installations (post 05/10/15) • 65% for all RFNBOs	This introduces different thresholds for different fuel types. The changes to the thresholds and FFC almost exactly cancel out.
Default carbon intensity values	Default values specified in RED annex V can be used	Default values specified in guidance can be used. Almost all the same as REDII, except for biomethane.	New values need to be used for reporting: • Suppliers must ensure they use the new default values • Carbon intensity templates and carbon calculator being updated to reflect this • Some differences for biomethane
Excess electricity credit	They could apply a credit for excess electricity applied	Credit for electricity no longer allowed	This should be reflected in GHG calculations – no credit should be applied.
Manure credit	Not permitted	It is permitted to apply a credit of 45 gCO2/MJ manure to fuels produced from manure	This may lead to some very low (i.e. negative) GHG emissions.

Legislative changes (3)

Aspect	Previous (2021) provisions	Current (2022) provisions	Verifier implications
Forest criteria	Currently forest biomass had to meet the land criteria	Forestry biomass don't have to meet the land criteria and instead have to meet the forestry criteria.	Two options for compliance: • conduct a third-party audit against the "sustainable forestry standard" • report using a voluntary scheme recognised for this criteria
Soil carbon criteria	Currently agricultural wastes and residues had to meet the land criteria.	In addition, agricultural wastes and residues also need to meet the soil carbon criteria as well as the land criteria.	Two options for compliance: • conduct a third-party audit against the "soil carbon standard" • report using a voluntary scheme recognised for this criteria
Land criteria	Applies to all products and wastes/residues derived from the land. Compliance is demonstrated through the "land use" box.	Continues to apply to the same feedstocks, excluding forest biomass.	Limited immediate implications. Be aware that forest biomass no longer needs to meet the land criteria.

Things to look out for

New requirements

- Wastes and residues from agriculture and forestry biomass – must demonstrate compliance with new criteria (likely through voluntary scheme)
- There shouldn't be credits from excess electricity applied
- New default values must be used for fuel supplied from January 2022
- Biomethane suppliers (incl. as a precursor – e.g. methanol) must also provide Pipeline (and other) transport information form

Differences to REDII

- Biomethane from anaerobic digestion – shouldn't be aggregating of GHG intensities across multiple feedstocks
- Biomethane defaults – ours are slightly different to REDII as include compression at the filling station

Things that might look weird, but are ok

- Biomethane from manure – can now apply a significant credit, so may have negative GHG emissions

Department for Transport

Biomethane for RTFCs

Training Material for Verifiers

Presenters Name: Sue Ellwood

Date: 13th January 2022

Purpose of this material

DfT published a new guidance document for biomethane as at July 2021

- Was transitional last year
- Takes full effect from January 2022

Deals with gas being moved in pipelines, and other forms of transport

Introduces a “pipeline (and other) transport information form”

- intended to support the process of data gathering and evidence recording
- should help verifiers !

Initial Training Session last July

Some minor updates to Guidance and Form since then

This presentation focuses on:

- Guidance updates
- Pipeline (and other) transport information form
- Quick rundown of particular things to look for

Contents

- Gas pipeline networks and other infrastructure
  - Nature of Gas Pipeline Networks
  - Roles in the market,
  - Shipping Key Principles
  - Mass Balance Concepts
  - Storage and other Transport
- Transport Evidence
  - Storage and other Transport
  - Pipelines
- Guidance Provisions
  - Introductory points
  - Losses and C&S Calculations
  - Heating Value
  - Duty Point
  - Other Matters
  - Mass Balance Requirements
- Pipeline (and other) Transport Information Form
  - Contents & appropriate use
  - Tables
- Key points for verifiers to look for

Gas Transport in Pipelines & Other Infrastructure

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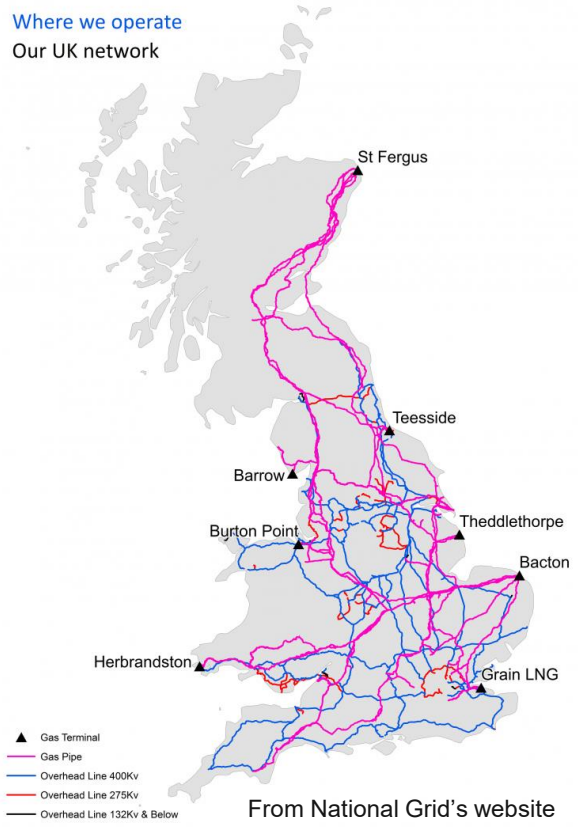
Nature of Gas Pipeline Networks



From National Grid's website

Gas pipeline networks exist to supply gas from a range of supply sources to a range of centres of demand

- Simple – a single pipe to a particular destination/demand centre
- Complex - different areas, closely meshed networks, maybe also some more distant zones

Gas in any pipeline system is mixed

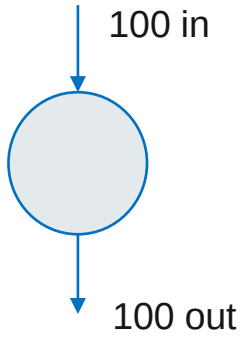
- Biomethane is effectively chemically identical to regular methane
- The molecules of gas going in to one part of the system are not moved specifically to a particular output point

Overall inputs (supply) and outputs (gas demand) on each pipeline system must be balanced day-to-day

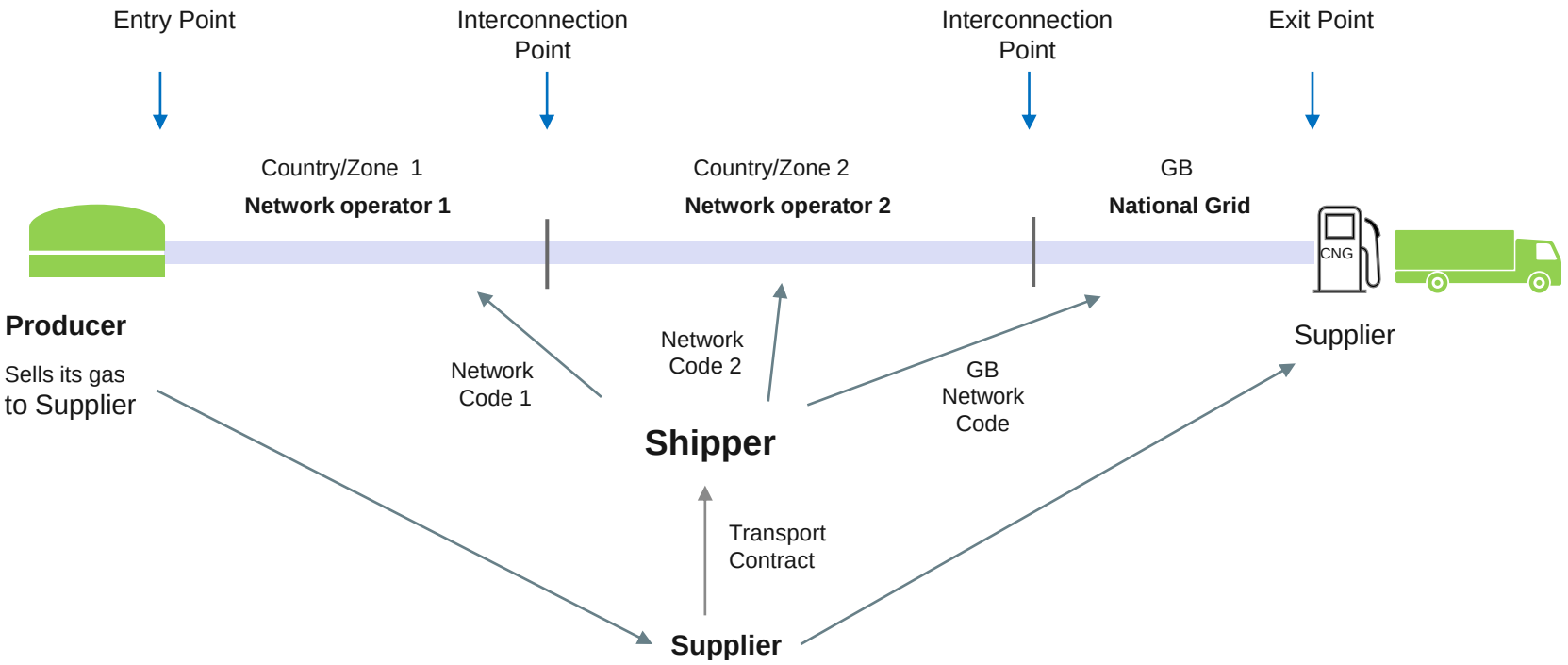
- The pipeline network operator is responsible for the physical safety of the pipeline
- Ensures physical inputs and outputs match within a safe operating range
- http://mip-prd-web.azurewebsites.net/StatusView/Index

Network operators have rules and mechanisms for making sure supplies and demand are balanced

- As well as contracts for use of the pipeline system
- These rules & contracts define the boundaries of the relevant 'balancing zones' – in terms of entry and exit points



Gas Market Roles Illustration



Shipping – Key Principles

Entry Points and Exit Points are the **key points**

- These are metered points which form the practical and commercial ‘boundaries’ of each pipeline mass balance system or balancing zone
- Shippers are incentivised to balance their inputs and outputs between these entry and exit points

Nominations are a request to the pipeline operator move gas in a pipeline

Allocations are confirmation of the quantity moved

- Nominations and Allocations are specific to the entry or exit point they concern

Shippers should hold capacity in order to make a nomination, otherwise they may pay a penalty for flowing without capacity

Capacity Bookings and **Allocations** of gas flows from the pipeline operator are key evidence of pipeline gas movements

- Shippers invoices from the pipeline operator contain this information
- Shippers will usually have other records showing allocated quantities in and out, as applicable to their activities eg ‘Allocation Statements’

Interconnection Point allocations are needed to show gas flows into UK from another country / across borders

- Interconnection Points are the entry/exit points between countries or entry/exit systems
- https://transparency.entsog.eu/#/map

Mass Balance System and Mass Balance Accounts Concepts:

Storage Site / Tank

- Site Operator has physical and operational control of the overall physical mass balance system - which is the tank/site
- Users have ‘mass balance accounts’ – their own inventory in and out, confirmed by the site operator

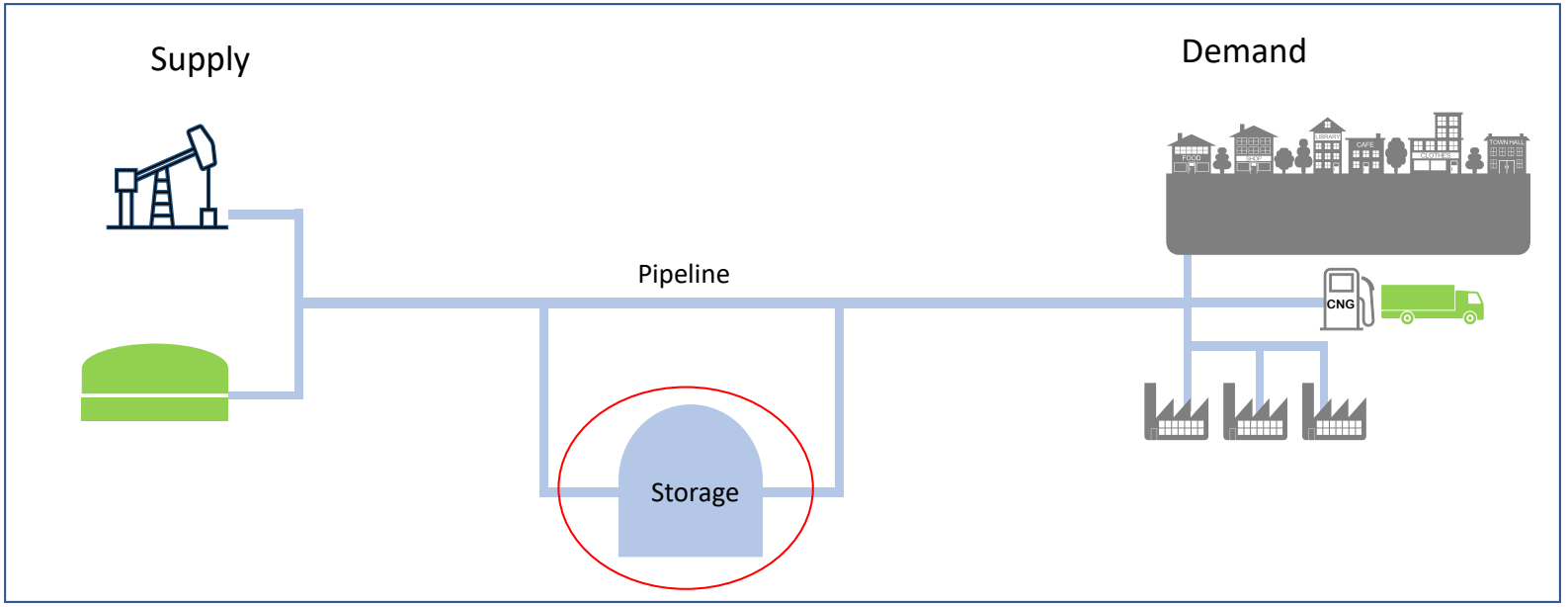
Transport

- Bill of Lading – inventory on/off the transport
- Truck driver manages the overall ‘system’ - which in this case is the truck
- Each transport user has an account with the truck driver/service provider
  - the user can show their inventory on/off the transport
  - and account for losses, where relevant

Each national pipeline system is (generally) a mass balance system in its own right

- The pipeline Network Operator has overall control of the physical mass balance of the system
- Users of the system (Shippers) have balancing accounts with the operator
- With gas pipelines – the system must be actually physically balanced (supplies = demand) on typically a daily basis, for safety

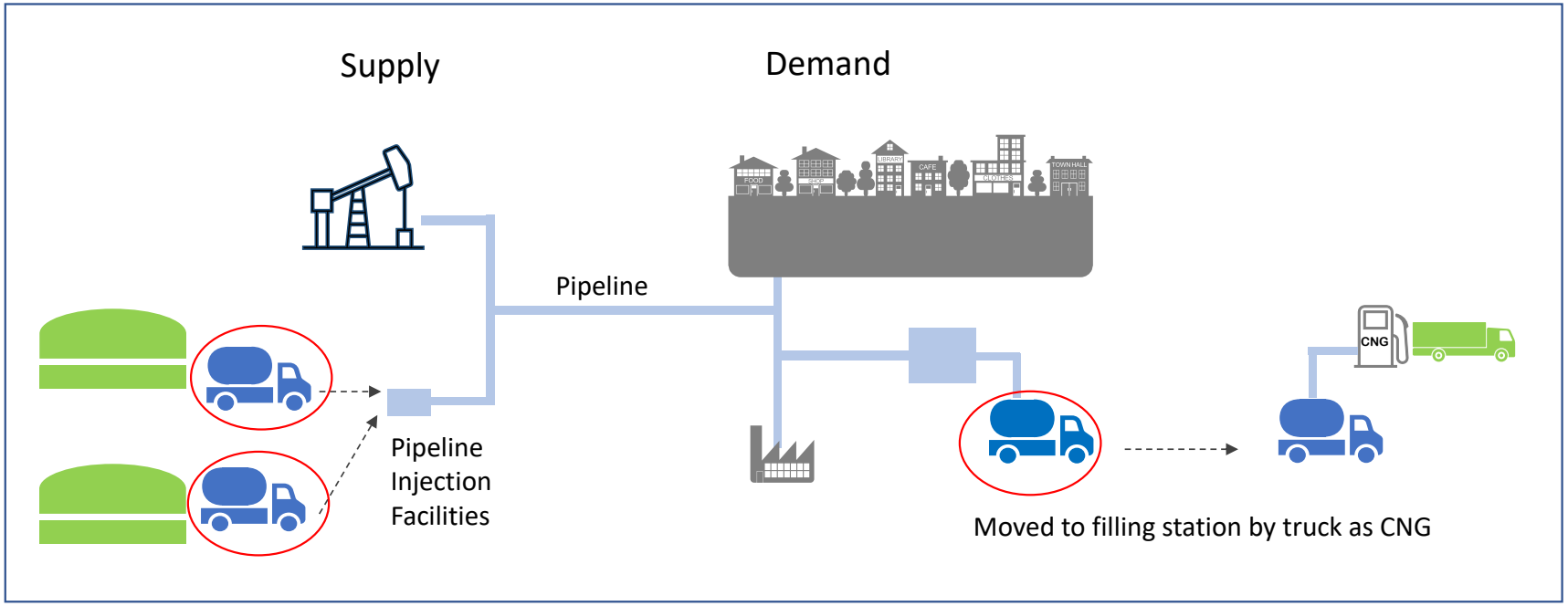
Interconnected Storage



Gas storage sites are usually interconnected with a pipeline, but have separate storage operators and separate commercial arrangements

- Storage Users are like Shippers in this regard – hold contract for capacity and use of the facility with storage operator and can provide a service to parties in the supply chain
- Storage sites should be treated as a separate ‘mass balance’ system
- Quantities in and out, with dates, as accounted for by the storage operator, will need to be recorded to confirm the chain of custody
    - And that a positive mass balance has been maintained

Storage and other Transport



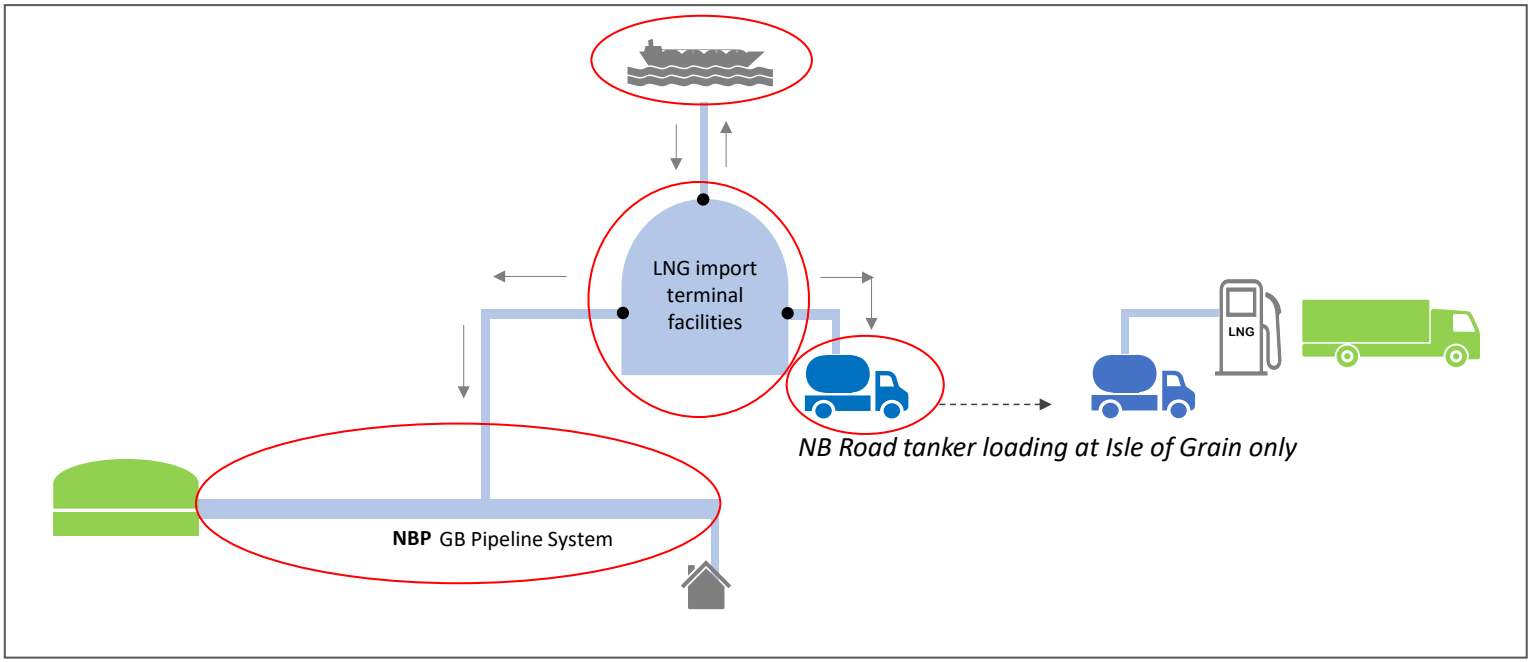
Biomethane can be collected in trucks/trailers and transported to a pipeline injection point

- Each transport from the production site to the pipeline will need to be accounted for
- Each treated as a separate ‘mass balance’ system
- Quantities moved, with dates, will need to be recorded to confirm the chain of custody
    - And that a positive mass balance has been maintained

Biomethane can also be moved downstream of the pipeline as CNG or LNG in trucks or trains

- Transport from the pipeline to the filling station will need to be accounted for
- Adjustments for Carbon & Sustainability of the biomethane and losses will need to be made for each step and each phase change

LNG Ships and Importation Terminals



GB has THREE LNG importation terminals – South Hook, Dragon and Isle of Grain

- Each terminal comprises LNG storage as well as regasification facilities injecting gas into the pipeline
- Isle of Grain also has an LNG tanker loading rack

- LNG ship is a separate system
- LNG storage, if used, is a separate system
- In respect of imports from a ship or the storage facilities, the pipeline is a separate system
- In respect of Isle of Grain – if loading road tankers, road tanker is also a separate system

Adjustments for Carbon & Sustainability of the biomethane and losses will need to be made for **each step and each phase change**

Transport Evidence

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Non-Pipeline and Storage Evidence

Sources of Evidence

- Contract for transportation or storage
- Contract Confirmation notes or Delivery Notes
- Invoices
- i.e. As long as they show:
    - Dates, quantities, locations
    - Consistent with contract, route and the **relevant systems/means of transport**

Gas quantities loaded on/off or in/out should be accounted for in accordance with the **regular rules and methods of the infrastructure operator**

- Weighbridge tickets or metering
- Bill of lading or equivalent

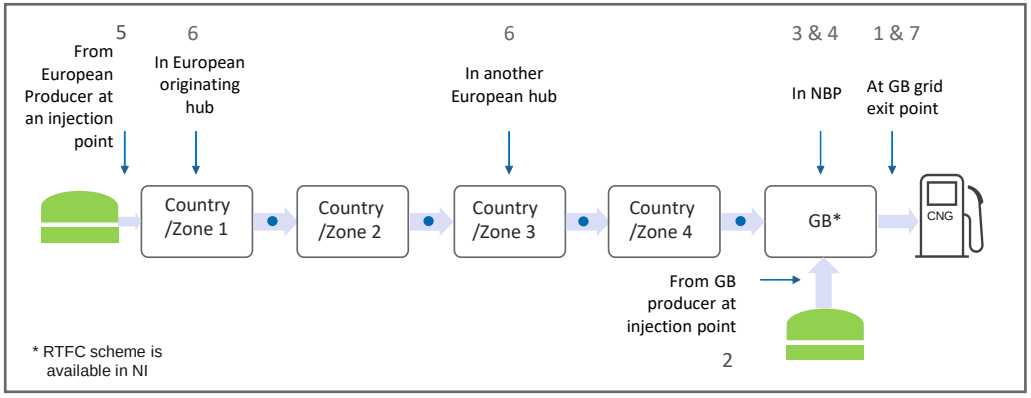
NB – Gas doesn't have to go in a pipeline to be moved!

- Whole supply chain must be accounted for

Pipeline Operating Models
Where is the Reporting Party buying the biomethane?

To help think about a Reporting Party's pipeline supply chain

- Guidance outlines 7 operating models
- It will be important to understand their contractual supply chain to understand the evidence that you would expect to see
- Distinguished by:
  - the point of purchase of biomethane by the RTFC Reporting Party
  - the location where it was produced
- Dictates the route over which the gas will need to have been transported
- The market role of the Reporting Party is also important
  - are they a Gas Shipper, Trader, UK Gas Supplier and/or Filling Station Operator?
- Who organised the transportation?
  - Reporting Party may have organised some, but not all
  - Who has supplied the remaining transport information ?



	Operating model type	Production point	Pipeline entry point	Cross border point	Pipeline exit point	Biomethane purchase point
1	Purchase of GB biomethane at the GB exit point/filling station	GB site	GB Production injection point	n/a	Filling station connection/exit point	GB Pipeline exit point/Filling Station
2	Purchase at the injection point for GB biomethane	GB site	GB Production injection point	n/a	Filling station connection/exit point	GB Production injection point
3	Purchase in the NBP for GB biomethane	GB site	GB Production injection point	n/a	Filling station connection/exit point	NBP
4	Purchase in the NBP for European biomethane	European site	European Production injection point	Each cross border point on the route from production to NBP	Filling station connection/exit point	NBP
5	Purchase at the injection point for European biomethane	European site	European production injection point	Each cross border point on the route from production to NBP	Filling station connection/exit point	European production injection point
6	Purchase in a European hub for European biomethane	European site	European production injection point	Each cross border point on the route from production to NBP	Filling station connection/exit point	European hub
7	Purchase of European biomethane at the GB exit point/filling station	European site	European production injection point	Each cross border point on the route from production to NBP	Filling station connection/exit point	GB Pipeline exit point/Filling Station

Pipeline Evidence

Evidence Type	Pipeline Entry Point	Cross Border Points	Pipeline Exit Point
Quantities	Quantities input into the grid	Quantities shipped across each border point	Quantities extracted from the grid
Capacity	Not required	Capacities booked at each cross border point(s)	Not required

Sources of Evidence

- Contracts
  - Sale/purchase
  - Contract for transportation

Evidence from Transporter or Evidence from Shipper

- Allocation Statements, Edig@s messages issued from Transporters systems, Capacity booking confirmation from PRISMA
- Contract Confirmation notes or Delivery Notes
- Invoices
- i.e. As long as they show:
  - Dates, quantities, locations
  - Consistent with contract and route

Aggregation of information

- Shippers providing service for more than one party can provide a disaggregated statement of relevant capacities and quantities booked for each relevant party, but they should retain records to show all the component parts of their aggregated capacities/flows
- Interconnection Point Capacities **must** be booked in the right direction (even when its against the price differential)
- Nominations **must** be made/allocations received in the right direction
  - It's **not acceptable** to net off capacity or flows in opposing directions

Guidance Provisions

Department for Transport

Biomethane Guidance Document

General Introductory Points

- It is focused on the transportation and storage of biomethane
- Applies for biomethane as a chemical precursor where its being moved in the supply chain
- Does NOT replace the wider RTFO requirements
- Transitional – Both old and new guidance could be used until 1st January 2022
  - This enabled Reporting Parties to use commercial reverse flow from 1st July 2021
  - Provided time for Reporting Parties who have not been meeting all the transport requirements of the new guidance to put their contractual arrangements in place
- Gas being put into vehicles from 1st January 2021 must have been transported through the pipeline systems
- This also means Reporting Parties/supply chain participants will likely need to have started using transport contracts **before** 1st January 2021

Losses and C&S Calculations

Administrative Consignments only

Proof of Sustainability

- From origin of the feedstock
- RGGOs or other green gas certificates not acceptable

Losses

- Applications must include any conversion factors that affect the final supplied quantity of gas
- Must adjust for grid losses (or losses in other means of transport)
- For pipelines, guidance provides a map with concentric circles to determine distance and a default figure of 0.13% per 1000km

Carbon Intensity

- Phase changes will affect carbon intensity
  - A Producer POS will typically show the carbon intensity of the produced fuel
  - Transport steps must then be accounted for
  - Acceptable for the Reporting Party to make these adjustments at the end of the supply chain
  - Final Carbon Intensity must be reported in LHV terms

Heating Value / Capacity Quantities

- Network operator meter data is typically determined/stated in HHV terms, but biomethane producers may state their quantities produced in LHV.
- For biomethane quantities determined at LHV entering the pipeline, the quantity delivered should be restated in HHV to determine the quantity of capacity which should be booked through the pipeline network.

Heating Value

Heating Value Conversions

- Applications for RTFCs should be submitted in kilograms
- Pipelines typically operate in energy terms (i.e. kWh)
- When converting the quantity in kWh delivered from a pipeline to kilograms, Reporting Parties should use **the same treatment of CV** as was used to determine quantities put into the pipeline
- Therefore, Reporting Parties should ascertain whether the quantity of biomethane injected into the pipeline by the producer has been determined/stated using a LHV or HHV
- Where this cannot be confirmed by the Reporting Party, they should use the most conservative assumption, i.e. the assumption which gives the lowest quantity of biomethane delivered
    - when converting from kWh to kilograms would be the HHV

Duty Point

Claims for RTFCs can only be made for the quantity of biomethane for which the fuel duty has been paid to HMRC

- HMRC currently permits duty payer to be either the injector or the final supplier
  - Complex (and potentially commercially sub-optimal) for injectors to pay duty in practice
    - Because of quantity loss adjustments in transport

Typically duty payer will be the final supplier

- Injectors submitting a claim for RTFC would still need to demonstrate the transportation of the biomethane to the vehicle(s) in accordance with the guidance
  - Guidance is written assuming Reporting Party is a supplier at the end of the supply chain
  - Injector-duty-payers still have to comply with all the requirements

Only one party can claim for a particular consignment of gas

Other Matters

RTFCs can only be issued for consignments of gas which:

- Meet the requirements for avoiding double counting set out in the wider guidance

Reporting Party must demonstrate no double counting

- Registration numbers and location of producers
- Dates of injection
- Purchase contract provisions may also support/require this explicitly – check the contract terms

Production in GB : Renewable Heat Incentive (RHI) registration number must be provided

- Ofgem and DfT have procedures in place to be able to check for multiple claims for a consignment

Exclusion of Book and Claim

- PoS **cannot be traded** without the physical consignment of gas – anywhere in the supply chain
- Reporting Party's purchase contracts should show that physical delivery is required
- Delivery or other contractual confirmation notes should show that this has been achieved

This is why transport information is required for the complete supply chain from production to consumption

Voluntary Schemes may not require transport information

- Hence this needs to be collected by the Reporting Party and summarised in the pipeline (and other) transport information form, for the whole supply chain
- Transaction data (under sales/purchase agreements) is also needed where not every party in the supply chain is certified

Mass Balance Requirements

Each party in the supply chain must have and retain their own mass balance records and evidence

Voluntary Schemes typically allow a mass balance period of a maximum 3 months

- During which a positive balance can be achieved
  - More biomethane brought in than taken out
- Positive balance – surplus can be carried forward
- Negative balance **cannot** be carried forward – ever, anywhere!
  - Reset to zero at the end of the mass balance period

For biomethane, DfT views mass balance as specific to the **party** in the supply chain and to the **system**

- Each party must maintain a positive balance in any given system over their selected mass balance periods

Data on the pipeline (and other) transport information form (location, quantities, dates) should support the mass balance for the consignment being claimed, but

- doesn't replace the need for mass balance bookkeeping by the Reporting Party or any other party in the supply chain

No overall limit on the elapsed time between production and consumption

Pipeline (and other) Transport Information Form

Department for Transport

Pipeline (and other) Transport Information Form Contents Table / Summary

Which Tables do I need to complete?		All parties certified under a recognised VS	Any non-certified party
Table 1	Biomethane Purchase Point	Yes	Yes
Table 2	Upstream Transaction Data	No	Yes
Table 3	Biomethane Injection Point	Yes	Yes
Table 4	Pipeline Cross Border Points	Yes	Yes
Table 5a	GB Grid Exit Point	Yes	Yes
Table 5b	Duty Point (where other than the Grid Exit Point)	Yes	Yes
Table 6	Non-Pipeline Transport Steps	Yes	Yes

Evidence:

- Capacity Bookings at Interconnection Point
- Quantities moved by each party

Found in:

- Contracts
  - Buy/Sell
  - With Shippers
  - With Transporters
- Delivery Notes/Confirmation Notes
- Shipper Statement

Pipeline (and other) Transport Information Form

Appropriate Use

- Should be completed by the Reporting Party, for review by verifier
- Can provide an index of the evidence
- Retained by Reporting Party for inspection by DfT if required
- Does not replace the actual evidence!
    - Verifiers should still expect to inspect evidence to provide reasonable confidence
    - Limited Assurance is still the requirement for verification

Acceptable to reformat the tables

- May be convenient to use one set of tables per purchase contract, OR
- May be convenient to use rows rather than columns
    - Tab providing illustration of how to do this
- Aggregate tables for cross border flows may also be appropriate
- Depending on how many contracts/purchases comprising the gas for which RTFCs are being claimed
- Adding columns for an evidence index, for example, may be useful

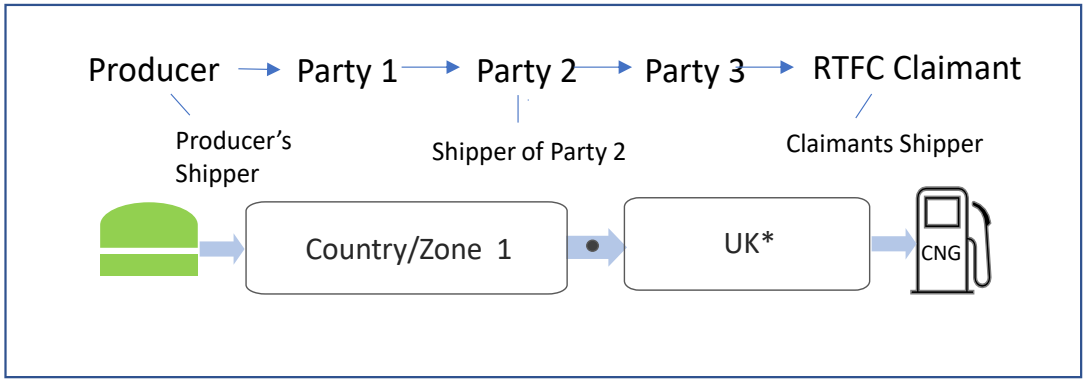
All relevant tables/fields must be completed, even if reformatted

Specific to the **claim period** (not necessarily the mass balance period of the Reporting Party)

- And the quantity for which RTFCs are being claimed

Pipeline (and other) Transport Information Form Contents Table / Summary

Operating Model 4 – Purchase at the NBP of European-produced Biomethane



Supply Chain
Producer's shipper delivers biomethane into Country 1
Producer sells to Party 1 at hub of Country 1
Party 1 sells to Party 2 @ the hub of Country 1
Party 2 ships the gas to UK NBP using its Shipper
Party 2 sells to Party 3 @ NBP
Party 3 sells to Reporting Party @ NBP
Reporting Party uses its Shipper to move the gas from the NBP to the grid exit point

Reporting Party's Biomethane Purchase Point = NBP (i.e. GBs National Balancing Point)

**UK = NBP*
NI = Northern Ireland Balancing Point

Where **all parties are certified**
- Table 1 = Reporting Party purchase contract details with Party 3
- Table 2 = not needed
- Table 3 = PoS information etc as specified in table 3
- Table 4 = Cross border shipping information from (Shipper of) Party 2
- Table 5 = Information from Reporting Party's own shipping contract/duty reporting

Where **not all** parties are certified
- Table 1 = Reporting Party's purchase contract details with Party 3
- Table 2 = needs completing for sale/purchases between Producer and Party 1, Party 1 and 2, and Party 2 and 3
  (add an extra table 2, and Reporting Party will need to ensure it can access this information)
- Table 3 = PoS information etc as specified in table 3
- Table 4 = Cross border shipping information from (Shipper of) Party 2
- Table 5 = Information from Reporting Party's own shipping contract/duty reporting

Network Operators and Shippers do **not** have to be certified,
Storage Operators and Storage Users do **not** have to be certified
Custody Chain participants **do have to be** certified: Producer, Party 1, Party 2, Party 3

Table 1 – Purchase

Own Reference	Biomethane Seller Company Name and Address		*i.e. The other party to the reporting party's biomethane purchase contract. Please state if the reporting party also owns the production facility/output at source*
	Country in which the Purchase Point is Located		
	Name of Location of Biomethane Purchase by RTFC Reporting Party (i.e. Name of purchase contract delivery point)		*i.e The contract delivery point in the reporting party's biomethane purchase contract*
	Type of Purchase Point (i.e. injection point/ within pipeline/ exit point)		*This information is to aid understanding of the custody chain operating model.*
	Biomethane Seller Status (i.e. producer/shipper/trader-shipper/non-shipping trader)		
	Delivery Date(s) for the gas delivered		*Please provide the date or date range over which the biomethane to which this application relates was purchased.*
	Quantity Purchased		
	Units of quantity purchased		*Specify whether the purchase is in kg, kWh, MWh or other units, and for energy units, the relevant heating value. Eg: MWh HHV or MWh LHV*
	Date of receipt of PoS		

Please see notes, and complete further tables where needed to cover all the biomethane for which RTFCs are being claimed.

Own Reference Column may be used if required to show consignment numbers, PoS references or other evidence index numbers as needed by the reporting party

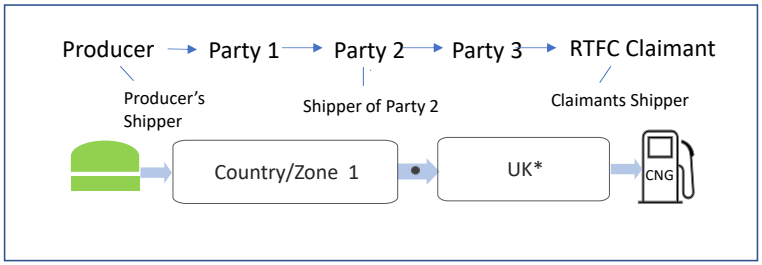


Table 2 – Transaction Data

Table 2	Own Reference	**Upstream Transaction Data, where applicable, relating to the purchase/production**		*Notes*
		Seller Company Name and Address		***Applicability** : If any party in the custody chain upstream of the delivery point in the reporting party's purchase contract is not certified under an approved voluntary scheme this information should be provided for every sale/purchase transaction in the custody chain, covering each/all consignments associated with this purchase contract.* *If the seller is the producer, or if every party is certified, this table may be left blank.*
		Buyer Company Name and Address		
		Location of Sale/Purchase Transaction (i.e country & contract delivery point name)		*i.e The contract delivery point in the upstream purchase contract*
		Date of Sale/Purchase		
		Quantity Sold/Purchased		
		Units of quantity sold/purchased		*Specify whether the purchase is in kg, kWh, MWh or other units, and for energy units, the relevant heating value. Eg: MWh HHV or MWh LHV*

If there is an uncertified party in the custody chain, please add further tables if required so that all sale/purchase transactions in this custody chain are shown

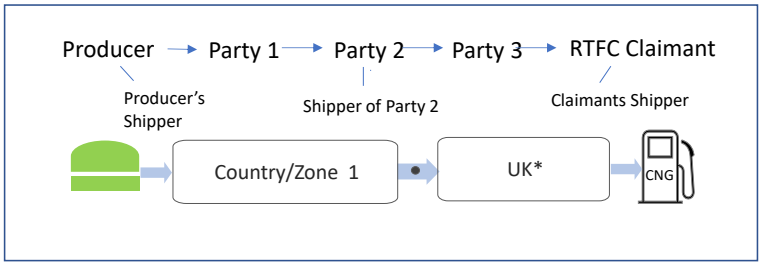


Table 3 – Injection Point

Table 3	Own Reference	**Biomethane Injection Point**		*Notes*
		Producer Name (if known by the reporting party) and Location		*The name of the producer/production location should be on the Proof of Sustainability or otherwise provided through the upstream supply chain.*
		Any relevant Registration Number(s) of Producer and type of Registration (i.e. local country/scheme Registration Number and Type of Registration e.g. GB RHI Registration Number(s))		*Relevant registrations (where applicable) should be provided here so as to assist if necessary with confirming that biomethane has not received support under any other scheme. Please state the type of registration*
		Injection Point Location (country/region/address where known)		*This may differ from the purchase point. The Producer (and the injecting shipper) will know this.*
		Date of Injection		*Please provide the date or date range over which the injection took place. Please note that the 'date of dispatch' on a PoS (particularly where issued by a certified trader) may not be the same as the date of injection into the grid.*
		Quantity Injected		*This should be the quantities shown on PoS's (or equivalent) , and the dates and quantities can be cross checked against confirmed/metered quantities, purchase contract notes and/or producer/producer's shipper invoices*
		Units of Quantity injected		*Specify units e.g. kWh / MWh and state whether LHV or HHV is applicable*
		Confirmation of compliance with the RTFO rules on multiple incentives (see Chapter 6 of the main RTFO guidance)		*Please confirm here the means by which this has been established - e.g. through contract provisions or otherwise warranted by the producer or seller*

Please see notes, and complete further tables where needed to cover all the biomethane for which RTFCs are being claimed in this period

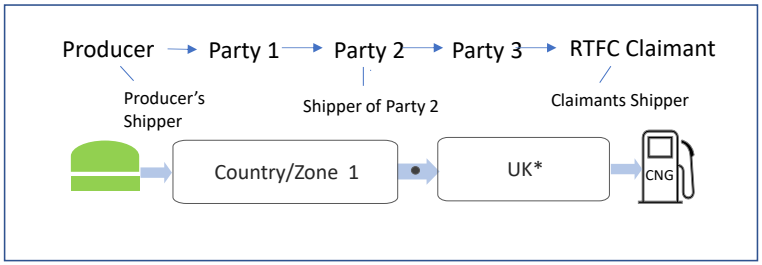


Table 4 – Cross Border Points

Table 4		Cross Border Points (Please list **all** interconnection points on the connected route between pipeline injection point and GB/NI (or other pipeline extraction point), and show the countries/regions/balancing zones on each side)		**Name of each cross border point (on route to GB, or on route to NI if the application is for gas supplied into transport in NI, or otherwise to the pipeline extraction point)**
		Country/Balancing Zone from:	Country/Balancing Zone to:	
Own Reference	1			
	2			
	3			
	4			
	5			
	etc	*Please extend table to continue as required to ensure all interconnection points are covered*		

Name of Shipper transporting the gas (or party responsible for arranging third party transport by a shipper) across each point	**Dates of bookings/gas flows**	**Quantity of capacity booked at each point**	**Units of capacity bookings**	**Quantities transported across each point**	**Units of gas flows transported**	*Notes*
						Quantities transported and capacity bookings and the associated dates can generally be found accompanying invoices from the relevant Shipper / transport-arranging party. The transport-arranging party is the party who holds the contract with the gas shipper. If biomethane has been purchased from a certfied trader, they should have also provided this information to the reporting party, under the purchase contract or separately. Verifiers should check/see evidence that the pipeline route is complete and check that the dates of the capacity bookings and confirmed flows support the mass balance and the application period. *NB Northern Ireland has its own balancing zone and so 'cross border flows' into/out of GB and/or ROI should also be covered. This table can be used for non-EU pipeline transport and should reflect the relevant country/region/balancing zones for the area concerned*

Table 5a and 5b – Exit Points

		GB Grid Exit Point*		Notes
Table 5a	Own Reference	Name/Location of GB Grid Exit Point		*Generally may be found on extracting Shipper's invoice - the extracting Shipper will know this.*
		Name of Filling Station Operator (if other than the RTFC claimant)		
		Date of Extraction		*Please provide the date or date range over which the extraction took place*
		Quantity Extracted		*These should be confirmed quantities as shown on/with withdrawing Shipper's invoice*
		Units of Quantity Extracted		*eg kg or kWh or MWh, LHV or HHV*

Please see notes, and complete further tables where needed to cover all the biomethane for which RTFCs are being claimed in this period

Table 5b	Own Reference	Location of HMRC Duty Point (if other than the grid exit point)		*Typically this will be the nozzle dispenser, or filling station entry meter point, but other points are permissible as agreed with HMRC*
		Dates of HMRC Duty Period		
		Quantity for which duty has been/will be paid		*This form may be completed for verification before duty is actually due/paid.*
		Units for Duty Paid Quantity		*Where this is kg, it may be helpful to record the LHV or HHV conversion applied*

Please see notes, and complete further tables where needed to cover all the biomethane for which RTFCs are being claimed in this period

** or NI if the claim relates to biomethane supplied from the grid into road transport in NI - NB currently there are no biomethane filling stations in Northern Ireland*

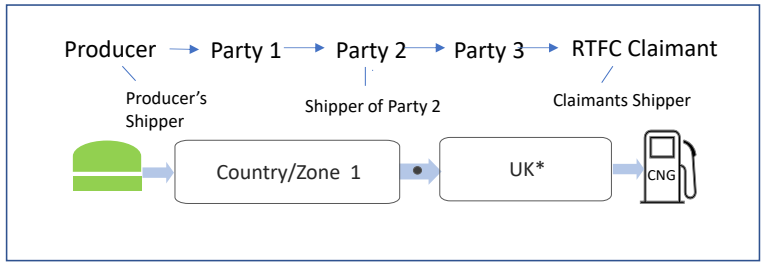


Table 6 – Other Transport / Storage

Table 6

	Any Non-pipeline Transport Steps (including on/off a ship, train, trailer or any other means of transport) or movements in/out of storage										
Own Reference	Means of Transport /Storage / Ship	Date	Location of loading	Quantity loaded	Units of quantity loaded	Date	Location of Unloading	Quantity unloaded	Units of Quantity Unloaded	Details of supporting Evidence	Notes
											Please provide details of nature of evidence including reference numbers where appropriate, eg bills of lading, weighbridge tickets, confirmation from road transport operator, Storage operator or a Gas Storage User

Rows may be added to include totals/sub-totals

QUESTIONS?

Key Points

Key points to look out for

Pipeline and other Transport Information Form

- Are all the contents of all the tables present and complete?
  - Especially if it has been reformatted / adapted at all
- Is the relevant evidence listed/indicated/indexed and available for inspection?
- Do all the dates correspond to the relevant time frame for the claim?

Production

- Has the biomethane been subject to any other counting or reward?
- Where and when was it produced?

Purchase Contracts

- Where/when did the Reporting Party purchase the biomethane being claimed?

Certification Status

- Is every party in the supply chain certified with a voluntary scheme?

Transport Route from production to consumption

- Is it all interconnected pipelines? Any breaks?
- Are all means of transport accounted for?
- How has the Reporting Party (or upstream counterparty) arranged transport?
  - What other parties/service providers were used?
  - Is the information from all of those parties present, as well as any and all upstream parties?

Aggregation and Netting off

- If a Shipper has provided a disaggregated statement of capacity and confirmed flows
  - Does it indicate the correct locations/route and the direction of flows?
  - Do the quantities correspond to the quantities being claimed?
- Did the sale/purchase contract provide that there should be no netting off?

Key points to look out for

Mass Balance

- Have the rules been adhered to?
- Through the whole supply chain?
  - Especially for biomethane which was produced some time ago, or where shipments are irregular?
  - And where the Reporting Party's duty period does not align with the claim period?
- If the Reporting Party has separate mass balance books, do the quantities on the form relate to the quantities in their mass balance books

Losses and Carbon Intensity Adjustments

- Are all steps in the supply chain accounted for, including every phase change if being transported as CNG or LNG?
- Are any reference sources used appropriate to this supply chain?

Any uncertified steps?

- Especially smaller transport such as tube trailers, and particularly prior to an injection point
- Is the Reporting Party satisfied that the supply chain participant has robust audit and accounting procedures?

Any gaps or inappropriate trading in the supply chain?

- Especially smaller transport such as tube trailers, and particularly prior to an injection point
- Any signs that a POS may not have been bought/sold without physical gas?
  - Are all time periods accounted for, for the consignment, between production and consumption?
  - Do the recorded locations correlate correctly with the route?
  - Does the Reporting Party's purchase contract specify physical delivery, throughout the supply chain, as a requirement?

FINAL QUESTIONS?

More Information?

Contact :

RTFO-compliance@dft.gov.uk

Sue Ellwood

sue@ellwoodsltd.co.uk