13 September 2019

Open letter - Commissioning Renewable Heat Incentive Tariff Guarantee biomethane plant

Energy Networks Association (ENA) is the voice of the networks, representing companies that operate and maintain the gas and electricity grid network in the UK and Ireland. Serving over 30 million customers, they are responsible for the transmission and distribution network of “wires and pipes” that keep our lights on, our homes warm and our businesses running.

Following the passing into law of the reforms to the Renewable Heat Incentive (RHI) and their coming into force on 22 May 2018, there are now over thirty biomethane plants that have successfully applied for a Tariff Guarantee as a route to commissioning under the RHI.¹

Under the Renewable Heat Incentive regulations “commissioned” is defined as:

“the completion of such procedures and tests as constitute, at the time they are undertaken, the usual industry standards and practices for commissioning that type of eligible installation or equipment used to produce biomethane for injection in order to demonstrate that it is capable of operating and delivering heat to the premises or process for which it was installed or producing biomethane for injection;”²

Understanding that many biomethane plants will be commissioned over the next few months and that contrary interpretations may cause delays, ENA and its gas network members wish to set out to all parties our view on “the usual standards and practices for commissioning”, as is determined by IGEM GL5 Edition 3 – Managing New Works, Modifications or Repairs to any plant or system associated with the supply of fuel gas.

Implementation of the IGEM GL5 Edition 3 standard ensures compliance with all applicable health and safety legislation pursuant to biomethane plant commissioning, notably the Dangerous Substances and Explosive Atmospheres Regulations, Electricity at Work Regulations, Gas Safety (Management) Regulations, Pipeline Safety Regulations and the Pressure Systems Safety Regulations. Adherence to these regulations will be common for all biomethane plant or the Delivery Facility Operator (DFO) that is commissioned.

Although the gas networks have their own versions of IGEM GL5 (PS6/G17) to account for different approaches to Remote Operable Valve (ROV), telemetry, odorisation processes etc., IGEM GL5 is the recognised industry standard to which all network-specific forms and certification that is completed must comply.

Accordingly, it is the agreed view of the gas networks that the two forms and process set out below reflect the “usual industry standards and practices for commissioning” as per the RHI legislation.

1. IGEM GL5 Edition 3
   a. For DFO assets not adopted by the gas network (typically that which is upstream of the ROV) Part D will need to be completed and signed off by a competent commissioning engineer.
   b. Gas networks will need to complete and have signed off by a competent commissioning engineer their sections, usually those relating to telemetry & ROV certification.

2. Safe Control of Operations – i.e. Non-Routine Procedure (SCO4)
   a. For DFO assets documentation is required to be completed and signed off showing capability of serviceable DFO assets to network ROV. This function demonstrates capability of operating and passing gas into the GDN system.
   b. Network SCO4 documentation shall be completed and approved in preparedness for the commissioning of network assets (i.e. ROV) to support gas flows into the system.

We believe the above industry standards and practice are correct for commissioning biomethane plant and that continuing to follow this approach is appropriate to ensure networks conform to their legal responsibilities.

This approach will ensure also that those plants with RHI Tariff Guarantees will be able to commission at their scheduled commissioning dates.

Biomethane is a major focus of ENA’s Gas Decarbonisation Pathways Project, an industry initiative to build on the work that the networks have been undertaking to build a low cost, low carbon network and develop new technologies that make the most of biogas, bioSNG, hydrogen and smart hybrid heating systems. It will help coordinate network activity and support policy making for decarbonised gas.

The gas networks are investing in biomethane: working to streamline connections, to reduce costs, to build the pathway for smart hybrid heating systems, and to increase the low carbon gas that is distributed to users today.

The gas networks have worked closely with biomethane producers since the first plants were commissioned, supporting around 100 green gas sites that are now connected to the grid. Going forward we believe that biomethane has an important role to play in the decarbonisation of heat, transport and industry and in meeting the Climate Change Act target of net-zero emissions by 2050.

Request for stakeholder views

If you would like to get in touch to discuss the usual industry standards and practices for commissioning please contact gas@energynetworks.org.

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