

FEEDBACK ON DRAFT INITIAL RULES FOR RENEWABLE GAS CERTIFICATION – SCHEDULE OF CHANGES

The following feedback was received on the draft initial rules published on July 5.

Feedback comprised both direct commentary on components of the rules, and more general commentary on areas where further investigation was required. In response to this feedback, we have both made amendments to the rules to now be published as the final initial rules set and amended the focus of subsequent work – captured in the ‘Phase 2 Work Programme’ explanatory document.

This sheet provides an introduction to feedback received, and the response taken. Where the feedback is sufficiently straightforward, we have made changes to the rules drafting directly. Where the feedback requires investigation, this feedback has been noted as included in the phase 2 work programme and may result in rules changes once this programme is complete.

Item reference ¹	Description of feedback	Response taken
General	Further clarity on interaction with specific international frameworks and standards is required.	Inclusion into phase 2 work programme. This feedback requires further investigation into specific international standards, particularly what will be required to ensure that fuels traded between countries can receive supporting credentials into the NZECS. As per stated exclusions, the rules did not reference international trade requirements – this is an area to be explored and developed within the phase 2 work programme.

¹ Reference numbers will be different in final rules, versus draft rules.



3.1	Inclusion of imported gas should be explicit	Drafting change to clause. This change ensures that the rules allow imported gas products to be classified under the NZECS in the same manner as gas produced in New Zealand, in order that certificates may be issued against these volumes.
5.2	Clarification required to Production Year rule	Drafting change to clause. This change rectifies a minor drafting issue, whereby the previous wording indicated that an issued certificate could be carried forward into future Production Years, in some instances.
General	Support for further development of system governance	Inclusion into phase 2 work programme. This feedback supports further development and implementation of the system governance structures, as discussed throughout phase 1 consultation. These structures will be developed and will be finalized through the phase 2 work programme.
7.	Further definition of Production Device required	Inclusion into phase 2 work programme. This feedback requests clarity about the definition and designation of a Production Device, particularly in relation to production scenarios where gas produced may undergo several processing steps, and where several entities may be active. The phase 2 work programme will seek to further engage with production projects to understand the likely production scenarios and how to appropriately define a Production Device in these instances.
8.2	Clarification sought around treatment of linepack	Drafting change to clause. This change clarifies that a pipeline or distribution system cannot be classified as a Storage Device.
9.1	Existing metering standards will not be appropriate for the measurement of production output of new gas types.	Drafting change to clause. The change to the clause includes the allowance for bespoke metering arrangements to be agreed during the process of registration of a Production Device. This will need to be understood further in conjunction with producers, and will be addressed in the phase 2 work programme.



General	Support for importance of accurate Production Device audit	Inclusion into work programme. This feedback reinforced the importance of properly capturing production characteristics via the Production Device audit process. The appropriate approach to achieving this outcome will be investigated and defined in the phase 2 work programme.
16.	Clarity around cancellation function required	Drafting change to clause. This feedback identified a minor change of wording required to ensure clarity around certificate cancellation.