

North Somerset Council

Report to the Council

Date of Meeting: 10 May 2022

Subject of Report: Commissioning and Procurement plan for new energy contract

Town or Parish: N/A

Officer/Member Presenting: Cllr Cartman

Key Decision: NO

Reason: Report to Council

Recommendations

That the Commissioning and Procurement Plan be approved and that authority for re-procurement of the energy supply contracts from 1st October 2022 be delegated from the Executive to the Section 151 Officer, in consultation with:

- Principal M&E Engineer (advised by Energy Management Consultants)
- Climate Emergency Project Manager
- Executive Member for Corporate Services

As a joint commissioning and Procurement Plan, advice has been received from the Director of Place and Head of Strategic Procurement.

1. Summary of Report

The Council's current energy contracts expire in September 2022. This report seeks to gain approval to proceed with re-procurement of these contracts. This report is also seeking delegated authority to commit to contracts, without further approval by the Executive under the Council's Contract Standing Orders, due to the fast moving nature of the energy market.

The energy market is currently volatile and it is important to ensure that North Somerset Council's energy demands can be met by a reliable and predictable supply. This procurement exercise seeks to re-procure energy through the existing framework as this is the most reliable procurement route currently available to cover the entire energy demand of the Council. However, it does not preclude additional procurement, for example to increase onsite and local renewable energy generation.

In order to meet our Climate Emergency objectives, we need to reduce the amount of energy we use and ensure that the energy we use is renewable. For electricity to be net zero compatible, it must meet the requirements of being renewably sourced; demonstrated

exclusive ownership of the energy attribute; and it must provide credible additionality. Additionality is a key requirement, this means that in the Council purchasing energy, it is directly contributing to expanding the amount of renewable energy available in the UK.

Work to reduce electricity consumption from streetlighting is almost complete. Once complete, this will reduce overall electricity consumption by 39% compared with 2019/20 levels. Funding has already been agreed for projects which will improve the energy efficiency of twenty Council buildings. This will reduce total electricity consumption by 5% and gas consumption by 21%, based on 2019/20 levels.

Officers are also investigating renewable generation models such as own investment in rooftop solar and power purchase agreements with local community energy companies. The latter would not only support reducing the Council's own carbon emissions but also increase the amount of renewable generation in the area and support other local low carbon projects.

2. Policy

This project will be procured in-line with the Climate Emergency Strategy and Action Plan approved by Council on the 12th November 2019. The award of contract will need to assist in delivering the aim of the strategy 'to be a carbon neutral Council and carbon neutral area by 2030' by delivering our energy with these key principles in mind. Consideration will always be given if carbon production can be; avoided, reduced, mitigated or stored, in line with the actions identified in the strategy (see Energy Reduction section below).

3. Details

Current Position

The Council ran a tendering process for the Energy Supply Framework in May 2017. This was a multi-lotted supplier framework which resulted in each of the four Lots, Half-hourly, Non half-hourly, Street Lighting and Gas with 3-4 suppliers awarded a place on each Lot. The framework was established in October 2017. The purpose of the framework, which is in effect a list of pre-approved suppliers, is to enable us to spot buy from the market at the right time without having to undertake a full procurement process. We initially procured a contract under the framework, which covered North Somerset's portfolio, including schools and academies from October 2018 onwards for 4 years. This contract expires at the end of September 2022, however the framework runs until October 2022, and this framework will be used to procure the energy contract that is the subject of this plan.

Contract Structure

The Council normally procures long term (3 to 4 years) energy contracts to protect against price increases and provide cost and budget certainty. However, given the volatility and uncertainty in the current market, the decision on length of contract is not clear cut. Market prices are over 100% higher than our current contract prices, and whilst cost certainty is valued, should the market settle down, and prices reduce over the next couple of years, then tying the Council in to a long-term contract would prove economically disadvantageous.

Lessons Learned from previous projects

The procurement of our existing energy contracts posed similar problems of an unstable market and increased pricing as we face now. In 2018, geo-political issues were creating uncertainty in the energy market that meant pricing was higher than we had previously paid and our resulting contracts were on average 15% more expensive than the last. We carried out two Request for Quote (RFQ) exercises from our framework suppliers as the first proved the timing was wrong to buy. The outcome was that we reduced the term of the electricity contracts taken up, from 4 years to 3, and procured for the final year when the market had settled down, around 1 year later. Buying for a longer term would have meant an even higher price, fixed over a longer term.

Conversely, the Council recently carried out a RFQ on behalf of the Sovereign Centre who wanted a one-year term. The result of this is that their renewal price is almost 100% higher than they had previously paid, demonstrating the value that can be gained from medium-longer term contracts.

We have considered the term of contract carefully and consulted widely on it. We will follow advice from Energy Management, our consultants, on the best time to buy and whether quotes received provide value for money or alternatively should be rejected. The current advice from Energy Management is that, although the market is expected to recover at some stage over the next two years, it will not return to the levels that were prevalent of our previous contract, and it is therefore inevitable that the new contracts will be more expensive.

Route to market

We propose to use the existing Council framework for the future procurement of energy supply contracts. The benefit of using this framework is that it makes best use of Council resource already invested into it and provides a value for money and compliant route to market. Alternative frameworks are available and have been considered, however they charge an additional cost and most include the same suppliers as are already on our framework. It was decided that our existing framework offered satisfactory energy options and therefore we will proceed with this route.

Market / Suppliers

The market is currently very unstable due to current limitations in energy sources and increased demand. Whilst the large suppliers appear to be stable, many smaller suppliers have gone out of business in the last few years, as they do not have their own direct energy sources therefore are at the mercy of the extremely high market prices and price caps. The energy market historically is a seller's market, with suppliers being so large that the Council has to be flexible to their processes, rather than expecting them to be flexible to ours. They do not tend to bid for Open Tenders, favouring frameworks, as this reduces their workload and allows customers to come to them. This has informed our procurement strategy as carrying out an open tender would likely yield few to no bids and reduce competition.

A quote carried out amongst our framework suppliers in October 2021 received responses from 3 out of the 4 available. These quotes were limited to pricing for a maximum of 3 years as suppliers were unwilling, at this time of uncertainty in the market, to provide a price for 4. This quote was approximately 70% higher than our current prices, and a further quote secured in Feb 2022 was over 100% higher than our current prices. Since the Russian invasion of Ukraine prices have increased further, and the market remains highly volatile and unpredictable.

Net Zero Compatible Energy

The Council currently uses “green” energy, which in principle is energy from renewable, non-polluting sources, as opposed to “brown” energy, which is produced from polluting resources.

Currently, within our Council target, we treat our “green” procured electricity as zero carbon. However, in 2021 the UK Green Building Council released energy procurement guidance for zero carbon buildings. In order for procured energy to be deemed zero carbon the energy must be renewably sourced and it must provide credible additionality. For most “green” electricity procurement, the additionality requirement is not possible – projects must result in real and verifiable emission reduction or emission avoidance for the organisation / consumer, as their direct effect is to increase renewable energy generation.

For North Somerset Council, approximately 3,500 tonnes CO₂e result from electricity consumption. Using a standard green tariff will do nothing directly to reduce those emissions, however it does show ambition and commitment to climate action. It sends a signal to energy providers that green electricity procurement is important. Net zero compatible tariffs which meet those three criteria will reduce those 3,500 tonnes CO₂e to zero.

For green gas, no energy provider can currently guarantee all gas is renewable – for example produced in an anaerobic digester – British Gas and SSE guarantee a certain percentage of their gas to be renewable (10% and 25% respectively), with the rest of their gas being offset. While the purchase of green gas shows willing it does not meet the zero carbon buildings requirements.

Energy reduction and self-generation

The most effective way to manage energy expenditure and resulting emissions is to reduce the amount of energy that we consume. A wide range of energy reduction initiatives are ongoing, including LED Street Lighting and Spend to Save initiatives agreed across 19 sites. Furthermore, 10 council buildings have been identified as good investment opportunities for onsite renewables, and £68k of funding has been allocated for new solar panels on the Town Hall. Full details of ongoing work to reduce energy demand were set out in the Climate Emergency Six Month Progress Report submitted to Council on 21st September 2021, and an update is scheduled for the April Full Council meeting.

It should be noted that regardless of the amount of renewable energy generated by these projects, the council will still need to secure an energy supplier. Renewable energy projects will continue to be considered and evaluated, and the procurement exercise that is the subject of this plan does not preclude us in any way from progressing such projects.

Consumption levels

In order to model the recommended strategy for procuring our next energy contract, future energy consumption levels from October 2022 have been estimated taking into account:

- Previous usage levels over the past two years
- Impact of reduced office occupancy as a result of post Covid new Ways of Working
- Impact of Street Lighting LED project and other savings initiatives

Consumption levels that have been used to model the procurement options and financial implications are as follows:

- NSC Buildings – Electric – 4,685,324 kwh
- Street Lighting – Electric – 2,000,000 kwh
- NSC buildings – Gas – 6,112,212 kwh

Schools

Schools will be in scope for the contract but will have the option to contract independently should they wish. The level of take up by schools is not expected to impact the contract prices.

Assumptions

Energy prices change several times daily and are likely to fluctuate considerably during the period over which our next energy contract will be struck. For the purposes of modelling the prevailing market prices in early February 2022 have been used, which range between approx. 100% (electric) and 160% (gas) higher than our current prices. Note that shortly after the Russian invasion of Ukraine prices increased by a further 60%, although at the time of writing prices have since returned to February levels. It is, however, too early to evaluate the long term impact on the market cause by global uncertainty, and the modelling has therefore not been updated at this stage.

The modelling below assumes that energy consumption remains constant and doesn't recognise the impact of future decisions on the number of corporate buildings, such as Castlewood. Please note that actual costs will be priced according to agreed tariffs and the tariffs themselves are not affected by consumption levels.

Modelling

Using the estimated consumption levels and prevailing market prices, estimated costs for 12 month and 24 month contracts are shown below. Note that only one of our framework suppliers is currently willing to provide a 36 month quotation, which has been disregarded for modelling purposes as it is around 28% higher than 24 month prices:

	Total cost pa - 12 months			Total cost pa - 24 months		
	Brown	Green	Net Zero	Brown	Green	Net Zero
NSC Offices	£1,374,018.12	£1,396,320.26	£1,412,718.89	£1,289,307.46	£1,311,047.36	£1,327,446.00
Street Lighting	£566,100.00	£575,620.00	£582,620.00	£531,640.00	£540,920.00	£547,920.00
Gas	£568,130.11	£585,244.30	Not available	£565,868.59	£585,244.30	Not available
Total	£2,508,248.22	£2,557,184.56	£2,580,583.19	£2,386,816.05	£2,437,211.66	£2,460,610.29
			Total assumes green cost for gas			Total assumes green cost for gas

The modelling shows that:

- Based on unit price from the February market exercise, green energy will cost around 1.6% more than brown energy, and Net Zero will cost around 2.8% higher than green energy. This makes Net Zero affordable based on February modelling figures.
- Based on the February modelling there appears to be little value (and increased financial risk) in a 12 month contract unless the market improves significantly over the next few months. Furthermore, a 12 month contract would require re-procurement to commence almost immediately, and in addition we would have to re-procure our frameworks. However, a 12 month contract would seem prudent should

prices return to the levels that were prevalent in early March shortly after the Russian invasion of Ukraine.

- In the current market most suppliers are reluctant to offer contracts in excess of 24 months, and the market exercise has shown that where longer contracts are offered they are more expensive. However, we should retain the flexibility to award a longer contract should market conditions change and this offer a reasonable level of saving compared to a short term contract.

Energy Management LLP

The Council has a contract with Energy Management LLP, who are an energy consultancy supplier who support the management of our energy supply contracts. The property portfolio for energy usage includes the Council's corporate estate and street lighting. The role of the energy consultant is to provide expert advice on the best time to buy different types of energy, to support us in block buying our energy at the appropriate time considering market conditions and to carry out bill validation to ensure we are not overpaying and all meters are being appropriately monitored.

Awarding the contract

Procuring energy supplies differs from other commodities and services in that market prices change constantly and therefore quotations cannot be held for any period of time. This means that there will be insufficient time available to utilise normal approval routes because decisions will need to be made in a matter of hours. The contract award decision will take into account the following factors:

- Prevailing market conditions
- Affordability considering existing and contingency budgets
- Green credentials of the energy procured, which should ideally be Net Zero Compatible
- Appropriate contract term taking into account available offers and projected market conditions

In order to ensure that the complexities of the above are properly taken into consideration the contract award decision will be made by the Director of Corporate Services (Section 151 Officer) in consultation with Principal M&E Engineer (advised by Energy Management Consultants), the Climate Emergency Project Manager and the Executive Member for Corporate Services. The Contract Award report will be produced retrospectively and will be published for transparency, noting that the decision will have been made.

Outline timeline

The new contracts need to be awarded by 30th September 2022.

This decision will inform our timeline of activities.

STAGE	DEADLINE
Consultation	Jan-Feb 2022
Commissioning/Procurement Plan at Full Council	12 th April 2022
Mini Competition exercise (if applicable)	May – Sep 2022 (driven by market conditions and expert advice)
Contract Award	May – Sep 22 (as above)
Contract Commences	1st October 2022

Governance

The main officers involved in this contract are:

- Head of Strategic Procurement
- Senior Procurement Officer
- Principal M&E and Energy Engineer (Contract Manager)
- Climate Emergency Project Manager

The following have also been consulted:

- S151 Officer
- Director of Place
- Finance Business Partner for Place
- Corporate Leadership Team
- Executive Member for Corporate Services
- PCOM Scrutiny Panel

In advance of the Full Council meeting to approve this plan, engagement sessions have also been held with:

- Informal Exec/CLT
- PCOM Scrutiny Panel

Social Value, TOMs, Sustainability & VCSE

Social Value was measured as part of pre-qualification for suppliers to join the framework therefore they have already made commitments which we are able to evaluate. The conditions of the mini-competition process, which were established on setting up the framework, mean that procurements under the framework will be 100% price based, given quality was measured at pre-qualification stage. For this reason, TOMs cannot be utilised for this opportunity but existing commitments can be aligned with the TOMs model for better measurement. Climate Emergency has been a strong focus of this procurement strategy and therefore we intend to invite quotes for the most environmentally friendly energy we can afford, therefore building this into the specification at mini-competition stage.

Evaluation

Mini-competitions are based solely on price as quality was previously assessed as part of the framework procurement. Suppliers will provide pricing against all of our meters within our estate and the lowest price for each Lot will be successful, subject to the parameters set out below. Pricing is based on the cost of energy on a specific day to create a level playing field for all bidders. By including schools within our portfolio, we are increasing the value of the contract to incentivise competitive pricing from our suppliers.

Contract Management

The Contract will be managed by the Principal M&E and Energy Engineer Mark Reed alongside our energy management consultants, currently Energy Management LLP but contract to be renewed in 2023. A Contract Management Plan will be produced once the contract has been awarded.

Russia

We have contacted our framework suppliers to seek assurances around the source of fossil fuels in the context of the current position in Ukraine. Suppliers were asked to confirm whether they had any financial interests in, or with, any Russian organisations or businesses, and also to confirm if they used any products or services supplied from Russian companies.

Responses received to date have focussed on confirming that the suppliers are compliant with all UK sanctions, and that they are monitoring the situation and would take and further steps that were necessary. However, they have stopped short of providing the specific assurances that were requested.

Officers will continue to monitor and discuss with framework suppliers, and the source of energy procured will be a factor in the final award decision.

Summary and recommendations

It is recommended that this Commissioning and Procurement Plan be approved, and that authority for re-procurement of the energy supply contracts from 1st October 2022 be delegated from the Executive to the Section 151 Officer, in consultation with:

- Principal M&E Engineer (advised by Energy Management Consultants)
- Climate Emergency Project Manager
- Executive Member for Corporate Services

4. Consultation

This paper and its recommendations have been discussed with:

- Amy Webb, Director of Corporate Services
- Lucy Shomali, Director of Place
- Informal Executive/CLT
- PCOM/All members session

5. Financial Implications

Costs

This procurement is predicted to increase costs against previous energy contracts, based on the request for quote exercise detailed in the 'Options Considered' section. The table below demonstrates the potential annual cost increases, were the market rates to remain the same as they were at time of quote.

	Current Budget (21/22) (£)	Brown 24 Month Contract (£)	Green 24 Month Contract (£)	Net Zero Electric / Green Gas 24 Month Contract (£)
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Electric	1,634,203	1,820,947	1,851,967	1,875,366
Gas	194,193	565,868	585,244	585,244
TOTAL	1,830,456	2,386,816	2,437,211	2,460,610
Increase compared to current budget		556,360	606,755	630,154
Budget increase approved within the Medium Term Financial Plan	648,000			
REVISED BUDGET	2,478,456			

The final cost achieved will depend on the term of contract procured. The quote exercise showed the rates would be slightly higher on a short-term (12 month) contract, although there is a risk that prices drop and the council has committed to pay current rates longer than necessary however, this risk has been flagged and is being wrapped into the consultation discussion.

Funding

The Energy supply contract is paid from resources set aside within the approved revenue budget, specific energy budgets are included within individual service areas across all directorates, with major components being street lighting and supply to office accommodation premises

In total the revenue budget in 2021/22 is £1.830m per annum for energy supplies. The Medium Term Financial Plan (MTFP) for 2022/23 included growth to the budget in order to meet the expected increase in costs, increasing the annual budget to £2.478m.

It should be noted that part of the Council's portfolio is made up of schools, these costs have been excluded from the above costs since they are funded directly by schools.

Summary

It is proposed that we seek to procure the energy within the approved budget envelope, aiming for net zero electric and green gas.

The hope is that the council will see improved pricing in the coming weeks however, as noted above, the markets are currently very volatile and prices could potentially become worse.

Should there be a marginal cost increase in prices compared to the approved budget, then any costs above this value will need to be funded in-year and then future financial impacts reflected within the 2023/24 MTFP or mitigated by saving opportunities.

There are a number of projects due to take place which will reduce energy consumption and therefore will reduce the annual cost of energy, any net savings from these would therefore be used to offset any cost pressures or be recognised as a future MTFP saving.

However, if the energy market remains volatile meaning that prices rise again and are significantly beyond budgeted levels, then the council would be required to take a more formal decision to identify additional resources to fund any in-year short-falls and to note the impact that this may have on the council's overall financial position.

An initial assessment of the council's finances show that the council does have access to the following resources should they be required to fund a material increase in energy prices;

- Contingency budget – provision included within the approved revenue budget to mitigate against the operational service-related risks faced by the council, which may have a financial impact,
- Reserves and balances – including the General Fund revenue reserve and also the Financial risk reserve, both of which would be one-off in nature

When making the decision to procure the new energy contracts the Section 151 Officer will be aware of the council's overall financial position and will ensure that the costs are funded in-year and any associated impacts are incorporated into the financial monitoring and reporting frameworks.

6. Legal Powers and Implications

This contract will be procured following relevant Procurement Regulations (Public Utilities Regulations 2015) and North Somerset Council's Contract Standing Orders. Due to the nature of the contract, if a new framework of suppliers is required, the Find a Tender Service (FTS) will be utilised to advertise the opportunity.

The Terms and Conditions of the Contract will be the awarded Supplier's standard terms and conditions.

7. Climate Change and Environmental Implications

The environmental implications of buying energy are extremely high which gives the council a good opportunity and responsibility to support the Climate Emergency aspirations through this procurement. Further detail has been provided in Para 3 above, but the key areas of opportunity are:

- Buying Net Zero Compatible energy
- Continuing to reduce consumption levels
- Initiatives to generate our own energy

The expected impact on emissions as a result of the above is as follows:

The table below gives an approximate estimate of the savings offered through various demand reduction measures. Purchasing Net Zero Compatible energy would provide us with zero emissions – this could be through a net zero compatible tariff or a Power Purchase Agreement (PPA) with a local renewable energy generator.

Note: these estimates do not take into account further decarbonisation work which will be necessary to reach net zero – such as removing and replacing gas boilers.

Electricity data	Costs (£)	Emissions (tonnes)	% of baseline
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		CO2e)	
Baseline (2019/20)	£ 1,834,807	2,220	100%
Savings			
Streetlighting	£ 724,720	1,343	39%
Energy efficiency (potential savings)*	£ 95,252	115	5%
No regrets Solar PV	£ 66,052	80	4%
New annual figures	£ 948,783	682	52%

Gas data	Costs (£)	Emissions (tonnes CO2e)	% of baseline
Baseline (2019/20)	£ 179,403	1,012	100%
Savings			
Energy efficiency (potential savings)*	£ 38,293	216	21%
New annual figures	£ 141,110	796	79%

* Energy efficiency savings identified through audits performed by Bristol City Council Energy Service

8. Risk Management

As described above, the energy market is currently highly volatile and unpredictable, prices are at an unprecedented high and will further be impacted by decisions by countries who provide energy to the UK (i.e. Russia) and the amount of renewable energy generated over winter.

In this context, the key risks of this procurement are as follows:

- Contract term – a short term (1 to 2 year) contract will be financially beneficial if the market recovers over the next 12-18 months and prices stabilise or reduce. However, a short-term contract carries the risk that, should the market deteriorate the prices for subsequent years will increase further. A longer (3 to 4 year) contract will offer price certainty for a longer period, but would be economically disadvantageous should the market recover and prices reduce over time. The council is using its Energy Management Consultants to mitigate this risk and they provide expert advice and experience and are constantly monitoring the market.
- There is a risk that we fail to optimise the opportunity to mitigate the impact on the environment of the energy that we buy. This risk is mitigated through buying net zero compatible energy, and supported through our ongoing efforts to reduce demand and generate our own energy.
- There is a risk that the suppliers on our framework do not offer value for money ie that better prices may be available from other suppliers. The advice of our Energy Management consultants is that this risk is considered to be low, and that our framework suppliers are providing prices that are comparable with the rest of the market.

9. Equality Implications

Have you undertaken an Equality Impact Assessment? Yes

The initial Equality Impact Assessment demonstrated that none of the customer groups identified would be negatively affected by this contract.

10. Corporate Implications

We do not foresee any corporate implications arising from these procurements, this contract is managed by the Principal M&E and Energy Engineer therefore no other area within the council is impacted. Part of the council's energy portfolio includes schools and therefore they will be impacted by the pricing we procure, however the Principal M&E and Energy Engineer will consult with the schools prior to approaching the market and will provide information we have on possible price increases and schools can choose to opt out if they wish. Ultimately schools spend is not significant enough for its absence to impact our buying power, conversely they are likely to incur much higher costs procuring separately so are likely to want to remain part of our portfolio.

11. Options Considered

Routes to market

Our options around route to market are as follows:

- Use our existing framework- Run further competitions across all 4 Lots (Half-hourly, Non half-hourly, Gas and Street Lighting), secure the term and type of energy agreed by the Council and detailed below. This option would benefit from work previously carried out by Officers to establish this framework.
- Use an alternative framework on the market- Were our existing framework to be deemed to be unsatisfactory, there are multiple frameworks that provide options. However, the suppliers on our framework have been deemed as suitable, and offer prices comparable to others in the market. Furthermore, use of an alternative framework will incur further costs to the framework providers, who take a fee per KW/H. This option looks to add needless additional cost for little gain however it could be used if our existing framework proved insufficient for our energy requirements
- Carry out an Open Tender- To avoid the fees and restrictions of existing frameworks internally and externally, the council could look to carry out its own tender, however advice from our Energy Management Consultants is that many suppliers would not bid for individual contracts as frameworks offer them a lower effort, higher return option. It is suggested that any response we would get would be limited, especially for those with the capacity and financial stability to provide a good option.
- Other procurement routes are available, such as the West Mercia Energy's Dynamic Purchasing System (DPS) Framework for the Supply of Natural Gas and Electricity, which is used by South Glos Council. However the advice from Energy Management is that this is merely a different route to the same market, and is unlikely to produce a different outcome. Furthermore, there will be a charge for using the framework that we would not incur through using our own framework.

Origin of Green energy-

We sought views on what standard of green energy the Council should procure, based on previous feedback around understanding how environmentally friendly an energy supplier's offering truly is, as well as current pricing and affordability. Whilst all renewable energy is technically the same, there is a consideration to be made around how much renewable energy a supplier produces for themselves and how much they outsource to other suppliers through the purchasing of REGOs (Renewable Electricity Guarantee of Origin) and RGGOs (Renewable Gas Guarantee of Origin) certificates.

The following are accompanying descriptions of each supplier's renewable energy options, provided alongside their pricing:

Supplier	Renewable Gas	Renewable Electricity
British Gas	"100% renewable gas backed by Renewable Gas Guarantee of Origin (RGGO) certificates. Carbon neutral gas backed by a combination of RGGOs and carbon offset certificates"	"Each MWh is backed by renewable energy guarantee of origin certificates. 100% natural renewable electricity option using only natural UK sources such as solar, wind and hydro"
SSE	"SSE Green Gas Plus is 100% certified renewable gas. Fully backed by Renewable Gas Guarantees of Origin (RGGOs) and Biomethane Certificates (BMCs) Additional verification from EcoAct, an Atos company"	"As standard, Prices include the provision of 100% renewable electricity generated by wind and/or hydro assets wholly or partially owned by SSE Group."
EDF		"Renewable for Business 100% Electricity backed by UK REGOs or European GoOs, from a blend of sources including hydro, wind, solar, biomass and landfill gas."

The recommendation is to buy as green as is possible, from suppliers who actively produce some or all of their own green energy rather than relying on buying REGOs from others.

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Appendices:

None

Background Papers:

None

