



# How Carbon Price Support has been incorporated into CHPQA

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### **Background**

- Government sought to introduce a floor price for carbon to stabilise price signals to investors in low carbon technologies
- ➤ This was implemented by introducing new rates levied upon supplies of the following taxable commodities to power generators (including CHP):

#### CCL

- Natural Gas
- LPG
- Coal

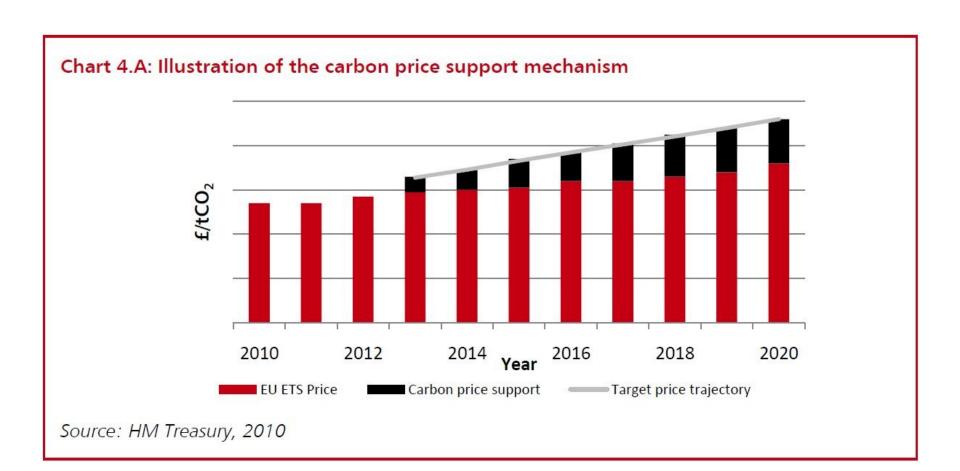
#### **Fuel Duty**

- Fuel oil
- Gas oil
- Bioblends
- These are known as carbon price support (CPS) rates
- CPS rates came into effect from 1st April 2013





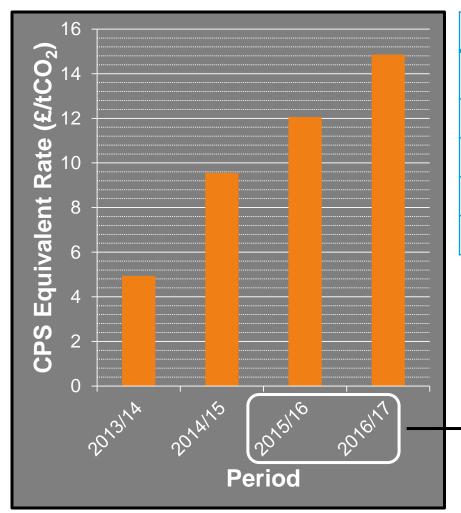
### **Background**







### **CPS Rates**



Commodity	Units	2013/14	2014/15	2015/16	2016/17
Natural Gas	£/kWh	0.00091	0.00175	0.00221	0.00272
LPG	£/kg	0.01460	0.02822	0.03564	0.04393
Coal	£/GJ	0.44264	0.85489	1.07962	1.33063
Fuel Oil	£/litre	0.01568	0.03011	0.03803	0.04687
Gas Oil	£/litre	0.01365	0.02642	0.03336	0.04112

Rates for 2015/16 and 2016/17 are Indicative





## **Talk Coverage**

#### **How CPS affect:**

- Standard Generators
- Auto-generators (>75% power output used on site)
  - Less than 2MW<sub>e</sub> capacity
  - ≥2MW<sub>e</sub> capacity
- Good Quality CHP (GQCHP)
  - Fully Qualifying
    - ≤2MW<sub>e</sub> capacity
    - >2MW<sub>e</sub> capacity
  - Partially Qualifying
    - ≤2MW<sub>e</sub> capacity
    - >2MW<sub>e</sub> capacity





### **Standard Generator**

#### **Previous Arrangement**



- Fuel input exempt from CCL
- Electricity output is subject to CCL (charged on to consumer)



- Fuel input subject to CPS rates
- No change for Electricity output (CCL paid by consumers)
- Additional costs to generators due to CPS rates can be expected to be passed on to consumers in the form of higher electricity tariffs.





# Auto-generators less than 2MW<sub>e</sub>

#### **Previous Arrangement**



- Fuel input subject to 100% CCL
- Electricity output consumed on site exempt from CCL



- Exempt from CPS
- No change on CCL (fuel input subject to 100% CCL)





# Auto-generators ≥2MW<sub>e</sub>

#### **Previous Arrangement**





- Fuel input subject to 100% CCL
- Electricity output consumed on site exempt from CCL

- Fuel input subject to 100% CPS rates - No CCL on fuel input
- All electricity output subject to 100% CCL - same as grid electricity





### GQCHP – Fully Qualifying with Capacity ≤2MW<sub>e</sub>

#### **Previous Arrangement**



- Fuel input exempt from CCL
- Electricity output exempt from CCL
- (Heat not subject to CCL)



- Fuel input exempt from CPS
- NO CHANGE to CCL (exempt from CCL on fuel input and electricity output)





### GQCHP – Fully Qualifying with Capacity >2MW<sub>e</sub>

#### **Previous Arrangemnt**



- Fuel input exempt from CCL
- Electricity output exempt from CCL where directly supplied



- Fuel input attributable to electricity generation subject to CPS
  - <u>Note</u>: Fuel input used to produce mechanical power is exempt as mechanical power is not an electrical output
- No CCL on fuel input
- Electricity output exempt from CCL where directly supplied

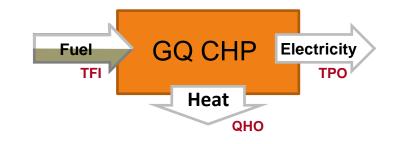




# Example 1: Full GQCHP > 2MW<sub>e</sub>

Fuel input subject to CPS based on the expression:

Fuel Input subject to CPS = 
$$\left\{ TFI - \left( \frac{QHO}{81\%} \right) \right\} - X - \left\{ 1 - \left( \frac{MO}{TPO} \right) \right\}$$



TFI - 1,234 GWh

TPO - 439 GWh

QHO - 420 GWh

η<sub>p</sub> - 35.6% ✓

QI - 102.87 ✓

Assuming no fuel used to produce mechanical power (i.e. MO = 0)

Fuel Input = TFI 
$$-\left(\frac{\text{QHO}}{81\%}\right)$$

$$= 1,234 - \left(\frac{420}{81\%}\right)$$

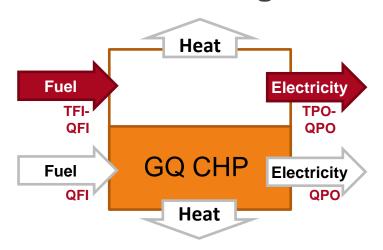
42% of TFI is not subject to CPS



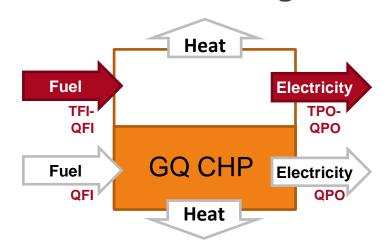


### GQCHP – Partially Qualifying with Capacity ≤2MW<sub>e</sub>

#### **Previous Arrangement**



- Qualifying fuel input (QFI) exempt from CCL
- Fuel input not QFI is subject to CCL
- Qualifying power output (QPO) exempt from CCL if directly supplied
- Power output not QPO subject to CCL



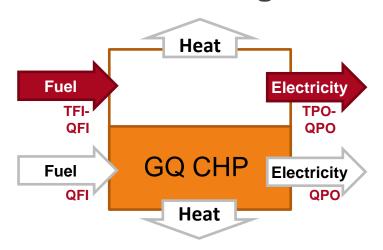
- No CPS
- No change to CCL



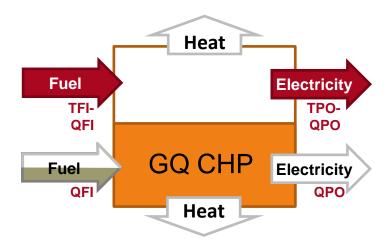


### GQCHP – Partially Qualifying with Capacity >2MW<sub>e</sub>

#### **Previous Arrangement**



- Qualifying fuel input (QFI) exempt from CCL
- Fuel input not QFI is subject to CCL
- Qualifying power output (QPO) exempt from CCL if directly supplied
- Power output not QPO subject to CCL



- Qualifying fuel input (QFI) exempt from CCL
- Fuel input not QFI is subject to CCL
- Qualifying power output (QPO) exempt from CCL if directly supplied
- Power output not QPO subject to CCL
- Fuel attributable to electricity generation subject CPS= TFI – QHO/81%





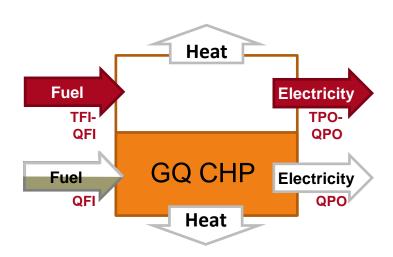
# **Example 2: Partial GQCHP >2MW<sub>e</sub>**

Fuel Input subject to CPS
$$= \left\{ TFI - \left( \frac{QHO}{81\%} \right) \right\} - x \left\{ 1 - \left( \frac{MO}{TPO} \right) \right\}$$

$$= 57 - \frac{21}{81\%} = 31GWh$$

54% of Fuel Input will be subject to CPS

The example above assumes No fuel used to produce mechanical power (i.e. MO = 0)



#### In addition:

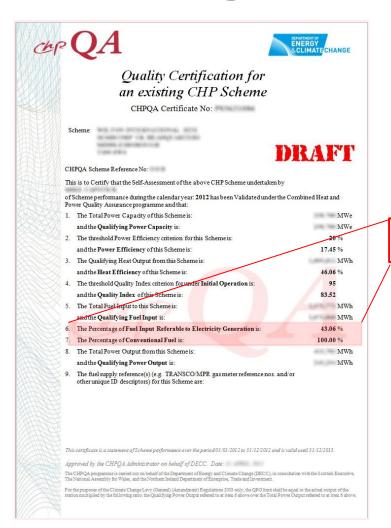
- CCL will be levied on non-qualifying fuel (TFI-QFI) = 9.6GWh
- CCL will be levied on non-qualifying power (TPO-QPO) = 3.6GWh

29% of TFI will be subject to neither CPS nor CCL





# **Advising CPS Liability for GQCHP**



The Percentage of Fuel Input Referable to Electricity Generation is:

The Percentage of Conventional Fuel is:

100.00 %

43.06 %

HMRC Published A Guide to the Carbon Price Floor in July 2013. This is CCI1/6

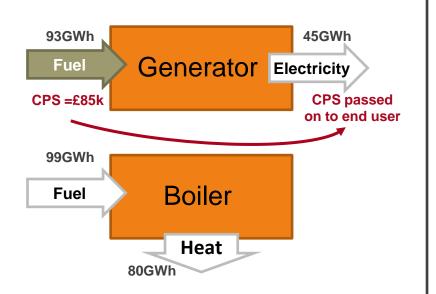




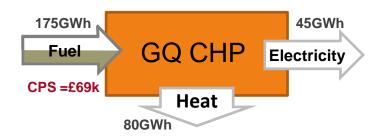
### **Frequently Asked Questions**

Is the impact of CPS on GQCHP worse than that for separate generation of heat and power?

Separate Generation



Good Quality CHP



Fuel subject to CPS = TFI 
$$-\left(\frac{QHO}{81\%}\right) = 175 - \frac{80}{81\%} = 76GWh$$

CPS liability = £85k

CPS liability = £69k





### **Frequently Asked Questions**

What are the benefits of certifying as GQCHP?

- Versus auto-generators:
  - Auto-generators are liable for CPS on 100% of fuel input and CCL on 100% of power output
  - GQCHP are liable for CPS only on fuel referable to the production of electricity. Also exempt from CCL on qualifying power output if directly supplied.
- ➤ Also: upon ceasing to be GQCHP, any auxiliary boilers within the scheme would be subject to CCL on input fuel. And if operating as Auto-generator all fuel will be subject to CPS