

CCUS Transport and Storage Business Model Revenue Support Regulations

Fuels Industry UK Response – v1

1. Do you agree with the proposals relating to the Secretary of State's power to direct a counterparty to offer to contract?

Fuels Industry UK agrees with the proposals relating to the Secretary of State's power to direct a counterparty to offer to contract.

This approach seems a pragmatic approach to allow CCUS Transport and Storage business model contracts to be progressed and signed in a timely and effective manner. This essential for the successful delivery of UK projects required to deliver the energy transition.

2. Is there any information not listed in Table 1 you think should be published in the RSA register?

Fuels Industry UK agrees that the information listed in Table 1 is sufficient and has nothing further that we would like to be added to those listed.

Transport and Storage Cluster information should be appropriate and not go into unnecessary detail. For example, detailed maps of key infrastructure such as pipeline locations should not be divulged; amongst other concerns this information may be used to target and disrupt what will become key parts of UK national infrastructure.

Personal information such as the names and contact details of key staff should not be divulged for reasons of commercial confidentiality and to prevent potential targeting by protest activity.

Finally guidance should be provided on the expectations of counterparties in updating the register in the event of changes in circumstance including for example expected deadlines for notification.

3. Is there any information in the contracts you think should not be published?

Fuels Industry UK suggests that the UK government should be cautious about any financial information, including fees, that are included in the register. This may be used to create adverse publicity for decarbonisation schemes. However we recognise that such information may be gained through other means (for example Freedom of Information requests)

4. Do you agree with the proposal for including a requirement in regulations on the counterparty to promptly notify the Secretary of State at the point that it considers that it may become unable to carry out its functions (in addition to the formal 3-months' notice period in the Act)?

Fuels Industry UK agrees with the proposal for including a requirement in regulations on how the counterparty must notify the Secretary of State.

This approach seems a pragmatic approach to allow CCUS Transport and Storage business model contracts to be progressed and signed in a timely and effective manner, while adequately protecting both counterparties. This essential for the successful delivery of UK projects required to deliver the energy transition.