Report on Good Energy's 100% renewable electricity brand promise, compliance with the WRI GHG Protocol Scope 2 Guidance Quality Criteria and carbon neutral Green Gas promise

November 2019

Section 1:
Foreword from Good Energy's Chief Executive and Founder

Good Energy was established 20 years ago with a mission to tackle climate change and help deliver energy security for the UK. Our aim is to take responsibility for climate change through giving consumers and businesses a choice in where their energy comes from, providing the blueprint for how energy companies can and should look in the 21st century.

Our vision is a decentralised energy system in the UK, empowering everyone to use, share, generate and store clean energy. A shift away from the old-fashioned high carbon system with a few large generators, to a modern low carbon system where consumers, businesses and communities play a far more active role in the market.

Our unique proposition of 100% renewable electricity, carbon neutral gas, independently-rated high quality customer service and competitive pricing has seen our customer base grow since we expanded our offering from domestic-only customers to the business community over two decades ago.

Good Energy's 100% renewable electricity fuel mix is compliant with the regulations which define 'The Electricity Fuel Mix Disclosure'. These regulations were created to show transparently where electricity has been sourced from and the environmental impact that resulted from its production.

Good Energy always has and always will supply 100% renewable electricity, derived only from UK sources of generation – this is our brand promise.

Good Energy also supplies UK homes and businesses with Green Gas. At least 6% of our Green Gas comes from biomethane – gas produced in the UK from organic matter like manure and food waste.

To make our Green Gas carbon neutral, emissions from the gas our customers use is offset through verified emission reduction biogas schemes, supporting communities around the world.

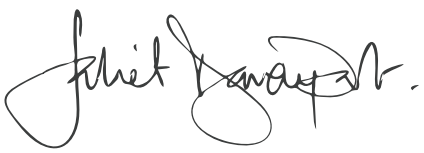
A commitment to the environment is an increasingly important to the core objectives of many businesses in the UK. For businesses concerned with reducing their environmental impact, the ability to report zero carbon emissions from its 100% renewable electricity usage is essential.

The World Resources Institute (WRI) is the leading international authority on carbon accounting and reporting. Its GHG Protocol Scope 2 Guidance (an amendment to the GHG Protocol Corporate Standard) provides global standards for companies reporting their greenhouse gas emissions and is recommended by the Department for Food and Rural Affairs as the best way to understand, quantify, and manage greenhouse gas emissions.

We strongly believe that the WRI's guidance on Scope 2 reporting is the global standard to which all energy suppliers' fuel mix must be benchmarked.

The guidance includes a set of Quality Criteria which details the global standard for companies to report the Scope 2 emissions from the contract that they have agreed with their electricity supplier, known as the market-based approach. Good Energy's adherence to these Quality Criteria means our business customers may report zero carbon emissions for the electricity supplied to them.

SGS UK Ltd ("SGS") has been selected to provide Good Energy with a rigorous assessment of our 100% renewable brand promise and interpretation of the WRI's Quality Criteria for Scope 2 reporting. SGS has provided an independent assurance opinion in accordance with ISO 14064-3 : 2006 Specification with guidance for the validation and verification of greenhouse gas assertions.



Juliet Davenport OBE
Good Energy Chief Executive and Founder

Section 2:
Good Energy's Management Assertions

1 100% renewable brand promise:

We have obtained and retired sufficient Renewable Energy Guarantee of Origins (REGOs) to match at least 100% of the volume of electricity supplied to our domestic and non-domestic customers for the year ended 31 March 2019.

2 Our interpretation of the WRI GHG Protocol Scope 2 Guidance (2015) Quality Criteria:

We have prepared our Fuel Mix Disclosure1 for the year ended 31 March 2019 in accordance with our interpretation of the Scope 2 Quality Criteria as defined by the WRI GHG Protocol Scope 2 Guidance (2015) table 7.1.

3 Minimum biomethane content of Green Gas:

We have obtained and retired sufficient Renewable Gas Guarantees of Origin (RGGOs) to match at least 6% of the volume of Green Gas supplied to our domestic and non-domestic customers for the year ended 31 March 2019.

4 Carbon neutral Green Gas promise:

We have obtained and retired sufficient carbon credits to offset the emissions created by the supply of gas to our domestic and non-domestic customers for the year ended 31 March 2019.

Section 4 of this document contains our Fuel Mix Disclosure table and the associated basis of preparation for the year ended 31 March 2019. Section 5 contains our interpretation of the WRI GHG Protocol Scope 2 Guidance Quality Criteria.

The Directors of Good Energy are and shall be responsible for Management's Assertions and this report, including the design of internal controls put in operation which determine the matching of electricity volumes supplied to our domestic and business customers, to that sourced from 100% renewable generation, and that our Green Gas is carbon neutral. Specifically, the Directors are responsible for establishing appropriate internal controls to ensure continued compliance with the Management Assertions and Assessment Criteria.

Juliet Davenport OBE
Good Energy Chief Executive and Founder

Signed for and on behalf of Good Energy Limited

ASSURANCE STATEMENT

NATURE AND SCOPE OF THE ASSURANCE/VERIFICATION
SGS United Kingdom Limited was commissioned by Good Energy Ltd (GE), Monkton Hill, Monkton Reach, Chippenham SN15 1EE, to provide independent assurance with respect to Good Energy's 100% renewable brand promise for the year ended 31 March 2019; and Good Energy's preparation of the Fuel Mix Disclosure table for the year ended 31 March 2019 in compliance with Good Energy's interpretation and basis of preparation of the WRI GHG Protocol Scope 2 Guidance (2015) Table 7.1 (Scope 2 Quality Criteria).

The Directors of Good Energy are responsible for:

- Ensuring that information relevant to the preparation of Management's Assertions (set out in sections 2, 4 and 5 of Good Energy's report) is free from material misstatement, whether due to fraud or error;
- Establishing objective reporting criteria for preparing Management's Assertions;
- Measuring and reporting Management's Assertions based on the reporting criteria; and
- The content of the report, including but not limited to Management's Assertions set out in Section 2 and the basis of preparation set out in Sections 4 and 5.

It is SGS' responsibility to express an independent opinion on the reported data within the scope of verification.

The objective of the engagement was to advise GE stakeholders that the following assertions within section 2 of Good Energy's report have been subject to an independent limited level of assurance:

- Management's "Brand Promise" assertion that Good Energy has obtained and retired sufficient Renewable Energy Guarantee of Origins (REGOs) to match at least 100% of the volume of electricity supplied to their domestic and non-domestic customers for the year ended 31 March 2019.
- Management's "Compliance Statement" assertion that they have prepared their Fuel Mix Disclosure for the year ended 31 March 2019 in accordance with their interpretation of the WRI GHG Protocol Scope 2 Guidance (2015) Quality Criteria (in Section 5).
- Management's "Carbon neutral Green Gas promise" assertion that Good Energy has obtained and retired sufficient carbon credits to match at least 94% of the emissions of Green Gas supplied to their domestic and non-domestic customers for the year ended 31 March 2019
- Management's assertion on the minimum bio-methane content of Green Gas. That Good Energy has retired sufficient Renewable Gas Guarantees of Origin (RGGOs) to match at least 6% of the volume of Green Gas supplied to their domestic and non-domestic customers for the year ended 31 March 2019.

The engagement was combined with the verification of environmental and greenhouse gas emissions and the verification and assurance methodology employed by SGS was based upon internationally recognized standards and guidance, including ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions. The assurance comprised a combination of desk-based documentation review and telephone interviews with relevant employees.

STATEMENT OF INDEPENDENCE AND COMPETENCE
The SGS Group of companies is a world leader in inspection, testing and verification, operating in more than 140 countries and providing services including management systems and service certification; quality, environmental, social and ethical auditing and training; environmental, social and sustainability report assurance. SGS United Kingdom Limited affirms our independence from GE being free from bias and conflicts of interest with the organisation, its subsidiaries and stakeholders. The assurance team was assembled based on their knowledge, experience and qualifications for this assignment, including experience in the assurance of environmental and greenhouse gas emissions related data.

VERIFICATION/ ASSURANCE OPINION
On the basis of the methodology described and work performed, SGS concludes that the reported data is materially correct and is a fair and balanced representation of GE meeting the GHG Scope 2 Quality Criteria for the period 01/04/18 – 31/03/19

Signed:

For and on behalf of SGS United Kingdom Limited
Pamela Chadwick, Business Manager
Camberley, 4th December 2019

SGS United Kingdom Limited
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Ellesmere Port
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Section 4:
Good Energy's Basis of preparation for the reporting of the Fuel Mix Disclosure: Our Brand Promise

The Electricity (Fuel Mix Disclosure) Regulations 2005 (FMD) regulations – which form Licence condition 21 of the Electricity suppliers Licence: Standard Conditions2 and, separately, Condition 30A of The Electricity (Fuel Mix Disclosure) Regulations 2005, obligates electricity licensees operating within the UK to publish the breakdown of generation by fuel type supplied to domestic and nondomestic electricity retail customers between the period of 1 April and 31 March, annually ("Disclosure Period").

The key concepts and definitions within the FMD provide the supporting basis for evidencing the WRI Scope 2 Guidance Quality Criteria, including:

1. Contractual evidences or proofs of generation which evidence the source, attributes and claim to a specific unit of electricity generation. For renewable electricity generated in the UK, this refers to renewable electricity tracking instruments; Renewable Energy Guarantees of Origin ("REGOs").

2. CO2 emissions factors for each specific fuel type and residual 'grid' electricity, as prescribed by DECC. For renewable electricity generated in the UK that is backed by a Renewable Energy Guarantee of Origin (REGO), this emission factor is zero.

Section 4A:
Outline of Good Energy's processes and calculations for the reporting of the Brand Promise

1. **Evidence of electricity purchases:**
   a. For all sources, Good Energy accounts for renewable sourced electricity purchases as being evidenced by the use of REGOs as approved under the FMD Regulations

2. **Supply data:**
   a. Total electricity supplied within the disclosure period is as determined under the Renewables Obligation methodology3, provided by Ofgem.

3. **Fuel Mix Disclosure calculation overview and method:**
   a. The data we use:
      i. For the purpose of benchmarking our 100% renewable fuel mix, we use the annually updated national FMD data published by DECC4.
      ii. As evidence of our 100% renewably sourced generation, we use REGOs as required by the FMD regulations.
      iii. As evidence of the volume of electricity we supply during the compliance period, we use the Renewable Obligation methodology.
   b. Overall Fuel Mix calculations
      i. In preparing our FMD, Good Energy ensures that our fuel mix is 100% renewable by holding at REGOs equivalent to at least 100% of our supply volume over the compliance period.
      ii. For the avoidance of doubt, as all of Good Energy's electricity purchases and electricity generation is sourced from embedded generation, we do not apply a Transmission and distribution loss factor as described within the FMD regulations.

2 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/82782/fuel_mix_disclosure_regs_2005.pdf Conditions%20Consolidated%20-%20Current%20Version.pdf
3 https://www.ofgem.gov.uk/sites/default/files/docs/2013/05/ro-supplier-guidance.pdf
4 https://www.gov.uk/government/collections/fuel-mix-disclosure-data-tables

Section 4B:
Performance Measure: The Fuel Mix Disclosure output for the disclosure period ended 31 March 2019

Good Energy's emissions factor table, presented below and published at goodenergy.co.uk has been prepared in accordance with The Electricity (Fuel Mix Disclosure) Regulations (2005) Condition 30A and Licence condition 21 of the Electricity suppliers Licence.

Good Energy's Fuel Mix Disclosure refers to its entire electricity supply for the disclosure period, therefore the CO2 emissions is applicable to all electricity supplied across the period for both business and domestic products:

100% renewable electricity product - every MWh of electricity supplied to all Good Energy business and domestic customers within a disclosure year is matched to renewable generation backed by a Renewable Energy Guarantee of Origin (REGO).

The Fuel Mix Disclosure table is prepared in accordance with our interpretation of the WRI GHG Protocol Scope 2 Guidance (2015) Quality Criteria.

Good Energy's Fuel Mix, published for the period 1 April 2018 to 31 March 2019:

	Fuel Mix					Environmental impact	
	Coal	Natural Gas	Nuclear	Renewable	Other	CO2 g/kWh	Nuclear Waste g/kWh
Good Energy	0.0%	0.0%	0.0%	100.0%	0.0%	0.000	0.000
UK Average[5]	5.2%	41.4%	18.7%	32.8%	1.9%	208	0.007

5 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/822503/fuelmix-disclosure-data-2018-2019.pdf

Section 5:
Good Energy's Assessment Criteria in relation to the WRI GHG Protocol Scope 2 Guidance

WRI Scope 2 Quality Criteria	Good Energy interpretation of WRI Guidance	Good Energy Basis of Preparation
1. All contractual instruments used in the market-based method for Scope 2 accounting shall: **Convey the direct GHG emission rate attribute associated with the unit of electricity produced.**	To make sure that the contractual instruments (REGOs) presented against the electricity supplied detail the fuel source from which the unit of electricity was produced. The emission rate attribute is then to be reported by fuel type as defined by the Fuel Mix Disclosure Act (2005).	Good Energy will only purchase electricity that has been generated by a renewable technology that is eligible to receive REGOs (UK contractual instruments which explicitly state the renewable fuel source of the generation).
2. All contractual instruments used in the market-based method for Scope 2 accounting shall: **Be the only instruments that carry the GHG emission rate attribute claim associated with that quantity of electricity generation.**	The contractual instrument (REGO) should be used as the sole proof of the GHG emission rate associated with that unit of electricity that has been supplied. As defined in the Fuel Mix Disclosure Act (2005)	Good Energy will redeem one REGO per equivalent MWh of electricity supplied to its customers.
3. All contractual instruments used in the market-based method for Scope 2 accounting shall: **Be tracked and redeemed, retired, or cancelled by or on behalf of the reporting entity.**	To ensure that contractual instruments (REGOs) are redeemed against electricity supplied in the corresponding disclosure period, under the existing Fuel Mix Disclosure regulatory process.	Good Energy will redeem one REGO per equivalent MWh of electricity supplied to its customers against the corresponding disclosure period.
4. All contractual instruments used in the market-based method for Scope 2 accounting shall: **Be issued and redeemed as close as possible to the period of energy consumption to which the instrument is applied.**	The contractual instruments (REGOs) retired as part of the Fuel Mix Disclosure process must relate to electricity supplied during the corresponding disclosure period.	Good Energy will follow the process defined by the FMD Act (2005) to retire REGOs against the appropriate disclosure period.
5. All contractual instruments used in the market-based method for Scope 2 accounting shall: **Be sourced from the same market in which the reporting entity's electricity-consuming operations are located and to which then instrument is applied.**	As per the Fuel Mix Disclosure Act (2005) contractual instruments from the EU and UK (GoOs and REGOs respectively) can be used as proof of fuel source against units supplied in the UK market. Good Energy interprets the 'market' as UK only. All electricity supplied will be backed by (REGOs) sourced from the United Kingdom only.	All electricity supplied by Good Energy will be backed by (REGOs) sourced from the United Kingdom (excluding Northern Ireland) only.

6. In addition, utility-specific emission factors shall: **Be calculated based on delivered electricity, incorporating certificates sourced and retired on behalf of its customers. Electricity from renewable facilities for which the attributes have been sold off (via contracts or certificates) shall be characterized as having the GHG attributes of the residual mix in the utility or supplier-specific emission factor.**	As per the Fuel Mix Disclosure Act (2005), all delivered electricity volume that is not backed by relevant contractual instruments (REGOs) should be reported as the utility-specific emissions factor. Where a utility backs 100% of its supply volume with relevant contractual instruments associated with renewable sourced electricity (REGOs), its utility-specific emissions factor will be zero.	Good Energy will only purchase and supply electricity that has been generated by a renewable technology that is eligible to receive REGOs, thereby ensuring that the utility-specific emissions factor for Good Energy will always be zero GHG emissions under the Scope 2 Quality Criteria.
7. In addition, companies purchasing electricity directly from generators or consuming on-site generation shall: **Ensure all contractual instruments conveying emissions claims be transferred to the reporting entity only. No other instruments that convey this claim to another end user shall be issued for the contracted electricity. The electricity from the facility shall not carry the GHG emission rate claim for use by a utility, for example, for the purpose of delivery and use claims.**	N/A As defined by the Fuel Mix Disclosure, Good Energy will only retire REGOs against electricity that it has supplied. The consumer is responsible for the contractual instruments relating to electricity purchased directly or from its own on-site generation.	N/A As defined by the Fuel Mix Disclosure, Good Energy will only retire REGOs against electricity that it has supplied.
8. Finally, to use any contractual instrument in the market-based method requires that: **An adjusted, residual mix characterizing the GHG intensity of unclaimed or publicly shared electricity shall be made available for consumer Scope 2 calculations, or its absence shall be disclosed by the reporting entity.**	N/A The annual Fuel Mix Disclosure submission details both the volume of electricity supplied and the sufficient number of REGOs to cover 100% of the supply. 100% of Good Energy's supply is matched by REGOs, therefore there is no requirement to report residual emissions mix.	Good Energy will only purchase and supply electricity that has been generated by a renewable technology that is eligible to receive REGOs, thereby ensuring that the utility-specific emissions factor for Good Energy will always be zero GHG emissions under the Scope 2 Quality Criteria.

Section 6:
Good Energy's Basis of preparation for the reporting of the Green Gas carbon neutrality promise

Unlike the electricity market, which is regulated under the fuel mix disclosure regulations 2005, the supply of Green Gas is voluntarily subject to carbon neutrality assertions made by Good Energy:

Good Energy therefore voluntarily requires that instruments must conform to the following criteria in order to fulfil the carbon neutral Green Gas assertion

1. Contractual evidences or proofs of biogas production which evidence the source, attributes and claim to a specific unit of biogas produced. For biogas produced in the UK, this refers to green gas tracking instruments such as Renewable Gas Guarantees of Origin ("RGGOs") or Biomethane certificates ("BMCs").

2. Verified carbon emission reduction certificates must be from certified schemes.

3. Although a proportion of the Green Gas may comply with the GHG Protocol Scope 2 Quality Criteria, the carbon neutral Green Gas promise does not confer any renewable energy benefits of the RGGOs, BMCs, or any other carbon credits/offsets to the end user. Therefore, the CO2 emissions factor for Green Gas will be as that of standard UK ("brown") natural gas.

Section 6A:
Outline of Good Energy's processes and calculations for the reporting of the Green Gas carbon neutrality promise

1. **Evidence of biomethane purchases:**
   a. For all sources, Good Energy accounts for biomethane purchases as being evidenced by the use of RGGOs or BMCs as approved under the Green Gas Certification Scheme or the Biomethane Certification Scheme

2. **Supply data:**
   a. Total gas supplied within the disclosure period is determined as the total therms supplied to us by our contract partner.

3. **Evidence of voluntary offsets:**
   i. All offsets will be backed up by carbon emission reduction certificates held on an approved registry and will be shown to have been retired for the benefit of Good Energy for the purposes of offsetting the emissions relating to any standard UK ("brown") natural gas
   ii. Emissions from brown gas will be calculated in accordance with the recommendations of BEIS using the annually published UK Government GHG Conversion Factors for Company Reporting

Section 7:
Good Energy's Definitions

1. **Contractual Instruments**
   The WRI sets out the GHG Protocol as guidance for all markets around the world. As each market differs as to what documentation is provided to detail the source of electricity generation, 'contractual instruments' includes energy attribute certificates (including REGOs – the contractual instrument for renewable energy in the UK), direct contracts, supplier/utility-specific emission rates, and other default emission factors.

   Good Energy interprets the contractual instruments relating to renewable electricity in the UK under the WRI GHG Protocol Scope 2 Guidance (2015) to refer to REGOs.

2. **Emission Rate**
   Emission rates document the greenhouse gas emissions associated with a supply of electricity. Expressed in metric tons per MWh or kWh.

3. **Renewable Energy Guarantees of Origin (REGOs)**
   The contractual instrument used in the UK to verify that electricity has been produced from a renewable source of generation. One REGO represents one megawatt hour of electricity generated from an eligible technology, as defined by Ofgem.

   Under our interpretation of the WRI GHG Protocol Scope 2 Guidance, REGOs are the contractual instrument used to verify the zero greenhouse gas emissions rate of the electricity supplied to our customers.

4. **Guarantees of Origin (GoO)**
   The EU equivalent of the Great Britain-sourced REGOs. EU GoOs can be used as part of a suppliers Fuel Mix Disclosure in Great Britain where the electricity has been imported and supplied in Great Britain and the GoO has not been used as evidence of fuel mix outside Great Britain.

   Good Energy only sources power from renewable sources of electricity generation in Great Britain, therefore GoOs are not used as contractual instruments under our interpretation of the WRI GHG Protocol Scope 2 Guidance.

5. **Disclosure period**
   The 12 month period from 1 April to 31 March as defined by The Electricity (Fuel Mix Disclosure) Regulations 2005.

6. **Supplier or utility-specific emission factor.**
   As part of the calculation, the utility or supplier should disclose whether and how certificates are used in the emission factor calculation, unless there is third party certification of the utility product. The utility or supplier-specific emission factor may be for:
   a. A standard product offer or;
   b. A differentiated product (e.g. a low-carbon power product or tariff).
      Every unit of electricity supplied by Good Energy is backed by a REGO to provide a utility-specific emissions factor of zero.

7. **Residual Energy Mix**
   In the UK, suppliers present REGOs to the Department for Energy and Climate Change (DECC). DECC then removes all claimed generation from the overall national average, which leads to the production of a 'residual' energy mix—with an associated emissions factor. This is issued to all suppliers so that they can complete their calculations for any of their supply without certificates. This combination of verified supplier claims and allocation of the remaining emissions back to suppliers ensures consistency across suppliers and accounting for all generation emissions.

   As every unit of electricity supplied by Good Energy is backed by a REGO, Good Energy does not need to apply the residual Energy Mix to its utility-specific emissions factor calculation.