
Assurance Statement

Foreword regarding Haven Power/Drax nomenclature

Haven Power was acquired by Drax Group in 2009 and supplies more than 20,000 large industrial and commercial customers with over 12TWh of renewable power each year. In September 2021 Haven Power rebranded itself as Drax. Whilst this REGO backed product verification examined the period of CP19 (1st April 2020 – 31st March 2021), during which Haven Power continued to trade under the name Haven Power, in this report we will refer to the company and any of its entities or employees as those belonging to Drax. This is in aid to reduce any confusion from its publishing after the afore mentioned rebranding.

Scope of Work

The Commercial team of Drax engaged EcoAct to provide independent third-party verification assurance that both their Reconciled Renewable Energy (RRE) product and their Biomass Renewable Energy (BRE) product meet the contractual instrument quality criteria of the Greenhouse Gas (GHG) Protocol Scope 2 Guidance 2015 for the reporting period of CP19 (1st April 2020 – 31st March 2021).

We audited the systems (processes, people, software) that Drax have designed to ensure the alignment of its products with the Quality Criteria and that its products' associated Renewable Energy Guarantees of Origin (REGO) and Guarantees of Origin (GoO) certificates are forecast, handled and processed as required to support the products' environmental claims.

GHG Protocol Scope 2 Quality Criteria

The GHG Protocol Scope 2 Guidance (2015) requires companies claiming low carbon electricity consumption to ensure that such usage is matched by 'contractual instruments'. Such instruments must meet the Quality Criteria which are set out in the addendum.

Roles and responsibilities

The Commercial team of Drax is responsible for:

- Designing, implementing and operating the RRE and BRE product whilst ensuring that they are aligned with internal Drax product documentation; and
- Maintaining internal control and quality checks so that supporting data is free from material error.

EcoAct is responsible for:

- Expressing an independent verification opinion on the RRE and BRE product with respect to the GHG emissions reporting guidance from the GHG Protocol; and
- Reporting our opinion, recommendations and conclusions to the Commercial team at Drax.

Description of activities

We audited the design of the product, including the processes and controls implemented for its management and to maintain its environmental claims, against the reporting and Quality Criteria of the GHG Protocol Scope 2 guidance. During the evaluation process, we:

- Reviewed and tested the design, implementation and operation of the product through document and data review and interviews with key Drax stakeholders.
- Evaluated Drax's REGO and GoO balance for the Fuel Mix Disclosure (FMD) period 1st April 2020 – 31st March 2021 and its key calculations in creating its FMD tables.
- Evaluated data systems and data handling methods and operational procedures for the products, Drax's REGOs and GoOs and its customers source data.
- Assessed the risk of customer supply volume exceeding REGO and GoO volumes.
- Assessed how the renewable energy product is marketed and sold to prospective and current customers.

Conclusion

Based on the information provided by Drax and our verification of that information, nothing has come to our attention to suggest that the 'RRE' and 'BRE' products do not meet the GHG Protocol Scope 2 Quality Criteria.

We are satisfied that the management and operating procedures of the products have been designed in line with the GHG Protocol Scope 2 Guidance (2015).



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London, November 2021

