



**Cyfoeth
Naturiol**
Cymru
**Natural
Resources**
Wales



PAN-027129: RWE Generation UK Plc Pembroke Green Hydrogen Project

**Permit application type: substantial variation
EPR/DP3333TA (Pembroke Power Station)**

Permit application queries (May 2025) – Green Hydrogen Production Facility

NRW query	NRW priority
Main Supporting Info document: Please confirm the rated thermal input capacity of the emergency power supply (backup diesel generator) in KWth or MWth. '500KW' has been quoted within the application, however this is not specific enough for duly making and verification of the application fee.	High - required for duly making
Charging tool (variation): NRW SRoC v1 2023-24 has been submitted with the application. We published NRW SRoC v2 2024-25 in June 2024 to reflect increased permitting charges; this version should be used to calculate the fee. It appears there is an underpayment of £572 (base charge) and £71 (noise assessment) = £643 total amount outstanding. Payment is required before duly making.	High - required for duly making
Drawings 1 – 3, Main Supporting Info document: Please confirm the installation boundary, including the extension for the green hydrogen facility and surface water drainage system. This is not shown consistently within the application. Should we consider Drawing 2 as the installation boundary (point 1.2.5 within the main supporting info document)?	High - required for duly making
Charging tool (variation): Within the 'Variation details' tab / Step 3 – complexity factors, Q4 (COMAH) has been answered 'yes'. Please can you clarify this / explain why the project brings the installation into COMAH regulation? COMAH does not feature elsewhere in the application.	Medium - helpful for duly making
Form C2, Main Supporting Info document: EMS description and certification not clear within the application. However, rwe-generation-environment – this appears to confirm a certified EMS corresponding to ISO 14001:2015 (see page 5)?	Medium - helpful for duly making

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Form C3, Main Supporting Info document: Please confirm max. production capacity of the GHPF and express clearly e.g. tonnes/hr, tonnes/day of hydrogen. This should reflect what the plant can produce, considering any downtime e.g. maintenance. Please also confirm if the mode of operation is continuous (steady state) or on a more flexible basis – see published GET guidance section 3.1.	Medium - helpful for duly making
Form C3, Main Supporting Info document: Directly Associated Activities (DAAs) are inconsistently described within the application. This can be fully addressed during determination, however a consistent list of DAAs serving the GHPF would be helpful, having regard to RGN2 Appendix 2 .	Medium - helpful for duly making
Form C3, Main Supporting Info document, Drawing 2, Drawing 5: Please can you clearly identify all point source emissions to air within the application. This is not clear or consistent at present. Our understanding: Oxygen vents x 2; Hydrogen flare stack; Hydrogen (emergency) vent x 1	Medium - helpful for duly making
Form C3, Main Supporting Info document, Drawing 5: With reference to ‘HOLDS’ on Drawing 5, please clarify the fate of surface water & process water. Are these flows directed back into the existing installation’s drainage systems i.e. no new surface water discharge points?	Medium - helpful for duly making
Form C3: Q5a regarding Environmental Impact Assessment (EIA). Answered ‘yes’ with ‘Appendix tbc’. Please can you supply a link to the published planning decision for your project, which should allow us to check for the necessary EIA information?	Medium - helpful for duly making

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Form C3, Main Supporting Info document: Table 3c refers to Section 2.4 of the main supporting info document (and the corresponding tables for AEL and PEM electrolyser raw materials). Does 'Usage' and 'Net Storage Capacity' correspond to 'Throughput' and 'Maximum amount (tonnes)' respectively? It would be helpful to present raw materials information in the same format and using the same units as Form C3.	Medium - helpful for duly making
Main Supporting Info document: We understand that Proton Exchange Membrane (PEM) is the now the favoured electrolyser type for the GHPF. Within the application, cooling options are narrowed down to air cooling or hybrid (wet/dry) cooling. Were these cooling options considered feasible for both PEM <i>and</i> Alkaline Water Electrolysis (AEL)? Does the PEM technology choice change anything?	Medium - helpful for duly making
Appendix C (Site Condition Report), Drawing 2: The SCR, Ground Investigation Report & Preliminary Risk Assessment do not appear to fully cover the requested installation permit boundary extension shown on Drawing 2. The missing section corresponds to part of the surface water drainage system and attenuation pond. Not a barrier to duly making but introduces risk to the applicant e.g. at permit surrender if the SCR + supporting info does not fully cover the installation.	Low (for applicant's awareness/info)

Diolch / Thank you

Oes cwestiynau gyda chi / Do you have questions?

