

Francey, David

From: Francey, David
Sent: 01 August 2008 14:32
To: NIRO REFORM 2008
Subject: BWEA and the NIRO reform consultation
Attachments: 080731 NIRO banding preliminary consultation.doc

David Francey

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From: BWEA Gordon Edge [<mailto:gordon@bwea.com>]
Sent: 01 August 2008 13:04
To: Francey, David
Subject: RE: BWEA and the NIRO reform consultation

David,

Many apologies for the time this has taken - holidays got in the way - but hopefully this submission by BWEA will help and influence your thinking. I am available to discuss if you have any further queries.

Regards,
Gordon

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From: Francey, David [<mailto:david.francey@detini.gov.uk>]

24/09/2008

Sent: 17 July 2008 09:39
To: BWEA Gordon Edge
Subject: RE: BWEA and the NIRO reform consultation
Importance: High

Mr Edge

We'd be very keen to receive a response from BWEA if something can be provided asap.

Regards

David

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From: BWEA Gordon Edge [<mailto:gordon@bwea.com>]
Sent: 11 July 2008 12:56
To: NIRO REFORM 2008
Subject: BWEA and the NIRO reform consultation

Dear Sir/Madam,

BWEA would like to input to your consultation on the reform of the Northern Ireland Renewables Obligation. Unfortunately I did not hear about the consultation until quite late, and we have not been able to write a position as yet. Would it be possible to send something to you next week on the subject? As you might imagine, the members of the British Wind Energy Association have a keen interest in the workings of all the UK Obligations, and thus that our views are taken into account by the Department.

Regards,
Gordon Edge

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24/09/2008

BWEA Forthcoming Events

BWEA Wales 08 - 9 July, Cardiff
BWEA30 - 21-23 October, London

For details of BWEA's 2008 events, visit www.bwea.com/events

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BWEA

Delivering the UK's wind, wave and tidal energy

Proposed Reform of the Northern Ireland Renewables Obligation, preliminary consultation Submission by BWEA

The British Wind Energy Association (BWEA) is the leading UK trade association in the field of renewable energy, with 400 corporate members representing the large majority of the wind energy business in this country. Wind energy is the fastest-growing renewable technology in the UK, and it will make an increasingly significant contribution to our electricity supplies over the next decade and beyond. BWEA also represents the interests of the emerging wave and tidal stream energy sector, building on its experience in the development of offshore wind. BWEA thus welcomes the opportunity to comment on the Northern Ireland Executive's proposals for the implementation of banding in the NIRO.

In general, BWEA believes that consistency between the three Renewables Obligations, in England & Wales, Scotland and Northern Ireland, is very important. We are therefore concerned about measures that could introduce significant differences and thus distort the market in the UK. Even relatively small differences applying to tens of MW are of concern, as well larger ones applying to hundreds of MW. This general attitude is reflected in the specific points that DETINI invited feedback on, to which we now turn.

BWEA believes the Renewables Obligation has been an effective policy instrument to support the development of new renewable generation capacity, and that the reforms, brought forward under a thorough consultation process, will further increase its effectiveness. The RO has created a positive economic 'pull' which developers have responded to. We strongly believe that the obligation should remain consistent across the UK in order to maintain both investor confidence and inward investment. Banding introduces complexity into the RO, and it is important not to further complicate the system through different

banding regimes in different regions. Variations to the 5-band scheme that UK Government has brought forward, such as awarding Landfill Gas projects in Northern Ireland greater than 0.25ROCs/MWh, undermine the consistency of the three ROs and over-complicate the system over the UK. In addition, it is important that banding in Northern Ireland is introduced simultaneously with reform in Great Britain.

It is important to note here the interaction between financial support for renewables and other aspects of policy. The draft Supplementary Planning Guidance on Landscape Sensitivity that the Assembly has recently consulted on is proposing varying limits on turbine height across the region. In general, smaller turbines are less economic than larger ones, so if both the planning policy and 1ROC/MWh for onshore wind are retained, then the SPG will result in certain areas being effectively sterilised for development, and the majority of Northern Ireland made less economically attractive. This would impede the industry's ability to deliver on the Assembly's ambitious renewable targets. In BWEA's view, this is an argument to change the draft SPG and not for varying multiples for onshore wind dependent on the height limit.

The banding and grandfathering provisions the UK Government has brought forward are appropriate across all the Obligations, and therefore we do not believe there are any specific Northern Ireland aspects that need to be considered in their application.

We do not believe that there are any issues related to the calculation of headroom that are specific to Northern Ireland, in addition to that outlined in paragraph 2.15 of the consultation. While it is currently unclear exactly how headroom will be calculated, we do not see why there should be any difference in this between the NIRO and the other Obligations. Also, we do not believe that there are any specific Northern Ireland aspects that need to be considered in relation to the 'Other Associated Issues'.

We have no comments at this time on the provisions contained in the draft Energy (Amendment) (Northern Ireland) Order. We hope that DETINI is in close contact with BERR so that the results of the current statutory consultation on the Renewables Obligation Order can be reflected in the regulations implementing the NIRO.