

Francey, David

From: McKernan, Malachy
Sent: 04 July 2008 11:04
To: Ballard, Terry (Corporate)
Cc: NIRO REFORM 2008
Subject: FW: Proposed Reform of the Northern Ireland Renewables Obligation - preliminary consultation RWE npower response
Attachments: 080710_NIRO consultation v2.pdf

Terry,

Response received with thanks

Best regards

malachy

Malachy McKernan

Sustainable Energy
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From: Ballard, Terry (Corporate) [mailto:TERRY.BALLARD@rwenpower.com]
Sent: 02 July 2008 13:03
To: McKernan, Malachy
Subject: Proposed Reform of the Northern Ireland Renewables Obligation - preliminary consultation

Dear Malachy,

Please find attached a response to the above on behalf of RWE UK. I would be grateful if you could acknowledge receipt.

Kind Regards,

Terry

<<080710_NIRO consultation v2.pdf>>

24/09/2008

Terry Ballard
Economic Regulation
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RWE npower



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10th July 2008

Preliminary Consultation - Proposed Reform of the Northern Ireland Renewables Obligation

Dear Malachy,

This response represents the views of the RWE companies operating within the UK namely RWE npower, a vertically integrated generation and supply company and RWE Innogy, which with effect from 1 February 2008, has brought together npower renewables UK assets, together with its development and operational activities. To date, this operating portfolio has developed over 450 MW of clean electricity with many more projects in construction and under development.

RWE supports the Renewables Obligation. To date it has created a positive economic environment that will encourage the growth of renewable generation in the UK. We support the view that the obligation should remain consistent across the UK in order to maintain both investor confidence and inward investment across the UK. The result of the banding proposals will be to introduce additional complexity into this mechanism. Variations that exacerbate this, such as the proposal to award Landfill Gas projects in Northern Ireland greater than 0.25ROCs/Mwh undermine this consistency.

We do not believe that there are any specific Northern Ireland aspects that need to be considered in the application of the proposed UK banding or grandfathering proposals.

We do not believe that there are any specific Northern Ireland issues in addition to that outlined in paragraph 2.15 although it is unclear as yet exactly how headroom will be calculated. Similarly 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 on the provisions contained in the draft Energy (Amendment) (Northern Ireland) Order. It is important that banding in Northern Ireland is introduced simultaneously with reform in Great Britain.

If you wish to discuss any aspect of our response, please do not hesitate to contact me.

Yours sincerely,

Terry Ballard
Economic Regulation

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