

**Francey, David**

---

**From:** Neil J Hewitt [nj.hewitt@ulster.ac.uk]  
**Sent:** 04 July 2008 13:10  
**To:** NIRO REFORM 2008  
**Subject:** Reponse to NIROC Reform  
**Attachments:** Ulster Response-NIROCs July 2008.pdf

Find attached our response  
Professor NJ Hewitt BSc DPhil CEng CPhys MInstP MInstR MEI  
Director, Centre for Sustainable Technologies  
University of Ulster  
Newtownabbey  
Co Antrim  
BT37 0QB  
Northern Ireland  
United Kingdom  
Tel: 0044 (0) 28 903 68566  
Fax: 0044 (0) 28 903 68239  
Email [nj.hewitt@ulster.ac.uk](mailto:nj.hewitt@ulster.ac.uk)

Director, Centre for Sustainable Technologies  
Professor Neil J HewittTel: 0044 (0) 28 90 368566  
Fax: 0044 (0) 28 90 368239Email [ni.hewitt@ulster.ac.uk](mailto:ni.hewitt@ulster.ac.uk)4<sup>th</sup> July 2008Malachy McKernon  
Sustainable Energy  
Department of Enterprise, Trade and Investment  
Netherleigh  
Massey Avenue  
Belfast  
BT4 2JP

Dear Malachy

Here is our response to the proposed reform of the Northern Ireland Renewables Obligation, preliminary consultation.

**1. Are there any specific Northern Ireland aspects that need to be considered in the application of these proposed bandings (annex A) – and especially the lower bandings – to the NIRO?**

We believe the main Northern Ireland consideration would be the possibility to have generation from Landfill Gas better rewarded as a result of its low development so far. Although in the future the methane producing part of waste will be diverted from landfill under European law, it seems unfortunate to reduce the economic viability, of a suitable but underutilized renewable resource in the mean time.

It is believed that the banding of micro generation, to a support level of 2 ROC's/MW is positive step to develop the installation of renewable generation by householders and industry. However the real value of micro generation will not be realised in NI until an export tariff is available where the generator is free to trade NIROC's independently, and still receive a fair price for electricity exported.

**2. Are there any specific Northern Ireland aspects that need to be considered in the application of these Grandfathering proposals to the NIRO?**

There is no Northern Ireland specific issues provide a suitable timeframe for an economic business case is maintained. However encouragement of co-firing should be considered.

**3. Are there any specific Northern Ireland issues (in addition to or associated with that outlined at paragraph 2.15) that should be taken into account in relation to the headroom calculations for the NIRO?**

The issue of NI being under a lower obligation to the rest of the UK is a difficult one, although it makes sense as the NI electricity price is historically higher than that of the UK mainland. Northern Ireland is arguably more susceptible to security of supply issues and therefore more incentives for the development of renewable electricity in NI should be encouraged.

If the head room is kept equal across the UK it will eventually result in the other regions of the UK funding the renewable industry in NI. Furthermore NIROC's will eventually have to be traded extensively when NI's lower obligation (i.e. 3% this year) is met.

**4. Are there any aspects that need to be considered in relation to the above proposals?**

The only difficulty arising from these proposals is the classification of biomass and waste, DETI must ensure that biomass and waste are treated equally across all policies and departments relating to the conversion of waste/biomass to energy (not exclusively electricity).

**5. Do you have any comments on any of the provisions in the draft Energy (Amendment) (Northern Ireland) Order?**

Clarity is sought on the micro generation generators' position in relationship to paying back grants before being upgraded to the 2 ROC band. Clarification is also sought on the role of gasification versus 2-stage combustion which has inherently a gasification process within in it but does not necessarily require further economic support.

Thanks are due to Mark Anderson who compiled the information for this response.

Yours sincerely



Neil J Hewitt (Professor)  
Director