



Michael Harris,
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Dear Mr Harris,

CONSULTATION FOR THE RENEWABLES OBLIGATION (AMENDMENT) ORDER (NORTHERN IRELAND) 2012

I am responding on behalf of the British Hydropower Association (BHA) to the consultation for the Renewables Obligation (Amendment) Order (Northern Ireland) 2012 and the review of ROC bands.

The BHA is the trade association for the UK hydropower industry. With around 170 members, the Association represents a wide range of interests: consulting engineering, design, manufacturing, investment and operation, and specialist service providers. The BHA represents generators from small owner-operators to large UK and international companies.

We agree that the operations of the Renewable Obligations of the UK administrations should, as far as possible, be consistent. We note that proposed changes to the Northern Ireland Renewables Obligation (NIRO) are based on the UK-wide Banding Review, on which the BHA had particular concerns on two questions:

- 5. Do you agree with the Arup assessment of costs and deployment potential for hydro-electricity? Please explain your response with evidence.**
- 6. Do you agree with the proposed level of support of 0.5 ROCs/MWh for hydro-electricity? Please explain your response with evidence.**

We note that the Department of Enterprise, Trade and Investment does not propose changes to the ROC support for hydropower schemes up to 5MW and proposes to introduce 0.5ROCs/MWh for schemes above 5MW only. Our responses to the Department of Energy and Climate Change and the Scottish Government included commentary on the Arup analysis the proposals for ROC support for hydropower ("Hydro industry evidence"). The document covered Feed-in Tariffs (FIT) also because we believe that FIT and Renewables Obligation Certification (ROC) regimes cannot be judged separately at this stage. In England, Scotland and Wales there is a capacity

band between 2MW and 5MW which is squeezed by the present FiT and the proposed ROC regimes.

These matters were raised at a meeting with DECC officials on 5th January 2012. Our document was revised in the light of the discussions at that meeting. It was agreed at that meeting that specific site data, load factor data, hydro potential and overseas operations could be submitted by 20th January. A copy of the BHA paper "Hydro industry evidence" is attached and a copy of the data were supplying DECC will be forwarded to you.

The BHA response to the questions raised in the consultation document are as follows:

Q1-Q7

The BHA has no comment to make on these matters

Q8. Do you agree with the decision to extend the NIRO to 2037?

Yes

Q9. Do you agree that the NIRO cannot remain viable to new generation after 2017 and that Northern Ireland should move to a Feed-In Tariff with Contracts for Difference?

Yes. However, consultation on the review of FiT in England, Scotland and Wales is on-going. Proposals on most technologies have yet to be made open to consultation. The outcome may have a bearing on how FiT is introduced into Northern Ireland.

Q10. Do you agree with the proposed RO Transition arrangements?

Yes

Q11. Do you agree that Northern Ireland should introduce a small scale Feed-In Tariff in line with that currently available to generators in Great Britain?

Yes but see the response to Q9 above.

Q12. Do you agree that the institution which will administer the FIT CfD should operate on a UK-wide basis?

Yes

Q13. Do you agree with the proposal to introduce the legislative primary powers for a large scale Feed-In Tariff and NI's role in the institution through the Westminster Bill?

Yes.

Yours sincerely,



Adrian Abbott
Policy & Consultations Manager