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12<sup>th</sup> January 2012

Your Ref: URN 11D/876

Dear Renewable Obligation Team,

## **CONSULTATION ON RENEWABLES OBLIGATION BANDING REVIEW AND RENEWABLES OBLIGATION ORDER 2012**

I am responding on behalf of the British Hydropower Association (BHA) to the consultation on Renewables Obligation Banding Review and Renewables Obligation Order 2012.

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.

There are two questions of direct interest to the BHA:

**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 have issues with the Arup assessment and we do not agree with the proposed change to support and our response is set out in the attached (revised) document. The document includes commentary on Feed-in Tariffs because we believe that FiT and Renewables Obligation Certification (ROC) regimes cannot be judged separately at this stage. 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 5<sup>th</sup> January 2012. Our document has been revised in the light of the discussions at the meeting using DECC's power prices. It was agreed at that meeting that specific site data, load factor data, hydro potential and overseas operations could be submitted by 20<sup>th</sup> January.

Yours sincerely,

A handwritten signature in black ink that reads "Adrian Abbott". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Adrian Abbott  
*Policy & Consultations Manager*