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12th January 2012

Dear Mr Rafferty,

THE RENEWABLES OBLIGATION (SCOTLAND) ORDER 2011: CONSULTATION ON REVIEW OF ROC BANDS

I am responding on behalf of the British Hydropower Association (BHA) to the consultation on Renewables Obligation (Scotland) Order 2011 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.

The Consultation question of interest to the BHA is the first one:

Other than the exceptions as set out in this document, do you agree that the Scottish Government should amend its bands and legislation in line with the proposals for the rest of the UK? If not, please explain where Scotland should differ and why (providing evidence as necessary).

We agree that the Scottish Government should amend its bands and legislation in line with the rest of the UK but there are two questions in the these proposals that are 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 5th 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 20th 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