

Response ID ANON-ZKVR-6REM-7

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Introduction

1 What is your name?

Name:

Simon Hamlyn - Chief Executive Officer - British Hydropower Association

2 What is your email address?

Email:

simon.hamlyn@british-hydro.org

3 Which region of the country are you based?

Region :

North West

4 What sector are you from?

Select your sector:

Hydropower

5 Do you have an abstraction licence?

No

Abstraction Reform

Change from seasonal licences to abstraction permissions based on available water

6 What are your views on the proposal to convert seasonal licences into abstraction permissions based on water availability?

Views on seasonality :

Seasonality - This should depend entirely on the nature of the abstraction and whether the abstraction is consumptive and if there is depleted reach.

Hydropower is non - consumptive and it has to be treated in a different manner entirely to abstractors who actually consume water

Linking water allocation to availability

7 What do you think about the different proposed approaches to linking abstraction to water availability for surface water and groundwater abstractions?

Thoughts on different approaches to linking water to availability :

The differing approaches to linking water to availability should depend on the precise nature of the abstraction. With regard to hydropower, this should depend on whether there is depleted reach and the fact that hydropower is non - consumptive must enable it to be treated in a different manner entirely.

The licensing system currently in place already regulates hydropower far more rigorously than drinking water abstractors because hydropower have set 'hands-off' flows where drinking water abstractors have a license to take a certain volume with no regard to how much is actually in the river.

8 Would it be helpful if abstraction conditions required abstractors to gradually reduce their abstraction at low flows before stopping, rather than being just on or off?

Would it be helpful if controls on abstraction were gradually introduced :

Yes. This system already applies to hydropower through the requirement to maintain a 'hands off' or residual flow, in addition hydropower installations cannot operate until the residual flow plus a percentage of their design flow is available from the watercourse.

This effectively increases the residual flow until such time as the available flow exceeds the residual flow plus a minimum, typically around 10% of the maximum licenced flow.

Thus the watercourse sees a varying flow until the hydro beings to operate then a lower residual flow and, once the available flow exceeds the design flow, variable flow again.

9 Do you think the proposal to protect the environment using a regulatory minimum level at very low flows is reasonable? If not, how do you think we should protect the environment at very low flows?

Thoughts on the proposals to protect the environment at very low flows:

This depends on the nature of the abstraction and whether the abstraction is consumptive. Hydropower is non - consumptive and the licensing system currently in place already regulates hydropower far more rigorously than drinking water abstractors.

See also reply to 8 with regards to minimum licensed flow to a hydro and the actual flows the watercourse experiences.

Managing discharges so their value is recognised

10 What do you think of the proposal to require abstractors who discharge water close to where they take it from to continue to discharge a proportion in line with their current pattern?

Affects of proposals to require discharges to continue:

All hydropower generation discharges all the water taken back to the watercourse. The depleted reach, if any, is the only part of the watercourse that may be affected

11 How best do you think water company discharges should be regulated to provide reliable water for downstream abstraction without impacting on water quality objectives or constraining flexibility in water management?

Thoughts on regulating water company discharges:

In relation to regulating water company charges, then the consumption of water from a river should be accounted for and considered when restrictions are considered being placed on abstractions

A charging system that reflects water use and reliability

12 If you are an abstractor, how would these charging proposals affect your business?

Thoughts on charging proposals:

There would be significant impact on hydropower generation if charged for the volume of water extracted and many schemes would be unable to operate.

Hydropower is non - consumptive and it must be treated in a different manner entirely

The licensing system currently in place already regulates hydropower far more rigorously than drinking water abstractors

13 To what extent would a system that charges abstractors partly on permitted volumes and partly on actual usage (ie a two part tariff) encourage abstractors to use less water?

Would the two part tariff encourage efficiency?:

A 2 part tariff could work for hydropower generation as whilst it abstracts large volumes it returns the exact same volume. Hydropower is non - consumptive and it must be treated in a different manner entirely

Facilitating trading to promote efficiency and resilience

14 Would quicker and easier water trading benefit abstractors now? How beneficial do you think it would be to abstractors in the future?

Is quicker and easier trading of benefit? Would it be in future?:

This would not work for hydropower

15 To what extent do you see additional benefits in the wider range of trades that can happen under the Water Shares option, compared to the Current System Plus option?

Can you see the benefit of water shares trading compared to the current system plus:

Not applicable for hydropower

16 Do you agree that participation in abstraction trading should initially be limited to those with a direct interest in abstracting water?

Should the market be constrained?:

Not applicable for hydropower

Reviewing abstraction permissions to protect the environment in future

17 Do you support our proposals for a more consistent approach to making changes to abstraction conditions? If not how would you improve the proposals?

Do you support our proposals on changing abstraction conditions? how would you improve them?:

Abstraction should be charged on the basis of consumption, not usage and as hydropower is non - consumptive it must be treated in a different manner entirely

18 What notice periods do you think would best balance the needs of abstractors and the environment?

What notice period is best?:

Hydropower schemes cannot change the amount they abstract and any changes could mean that the hydro scheme will become cost prohibitive and possibly redundant

19 Do you support the proposal to remove the payment of compensation for changes to abstraction conditions and to phase out the collection of the Environmental Improvement Unit Charge through abstraction charges?

Do you support the proposal to remove the payment of compensation for changes to abstraction conditions and the collection of EIUC? :

Not applicable to hydropower

Moving to a new system

20 Do you agree it is important to take measures when moving licences into the new system that would protect the environment from risks of deterioration?

Do you agree it is important to take measures when moving licences into the new system that will protect the environment?:

It is important to protect the environment, but charging hydropower schemes for abstraction and consumption, when hydropower is non - consumptive is not necessary, practical or beneficial

21 Would you prefer us to consider the risks in each catchment when designing the rules for moving licences into a new system, or should we treat all abstractors in the same way regardless of water availability?

Should catchments be treated individually or the same when moving licences into new system?:

Each catchment should be considered and treated individually as no one catchment is the same and no one abstractor is the same. Hydropower is non - consumptive and it must be treated in a different manner entirely.

22 What would be the most effective method to calculate the new annual limits to be transferred into the new system (for example average annual, average peak or a combination of actual and licensed volumes)? And what assessment period should be used to calculate them?

What's the most effective way to consider previous use and what period would be most effective?:

Abstraction and consumption should be calculated for each user within each catchment to determine a parameter within which each catchment can be measured and monitored.

Actual and licensed volumes should be used. The monitoring period should be at least 10 years and preferably 20 or more.

23 Do you support the establishment of a water reserve to support economic growth?

Do you support the creation of a water reserve?:

Water is integral to future economic growth and water management needs to be a transparent, dynamic and flexible process

Implementation and the Next Steps

24 Do you wish your details to be kept confidential?

state requirement and reason for confidentiality request:

Not necessary