

31 December 2001

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Dear Mr Mooney

Renewable Energy in Northern Ireland – realising the potential

BWEA represents 176 companies involved in wind energy in the UK. Established in 1978, it is the largest renewable energy body in the British Isles. It is with some concern, therefore, that we note paragraph 4.6 of the consultation in which you express concern about getting representative feedback on relevant issues, particularly as we have been in both formal and informal contact for many years, including our detailed correspondence during the summer of 2001 regarding Renewable development in Northern Ireland (on-line at www.britishwindenergy.co.uk/pdf/BWEA%20NI%20Policy.pdf). The observations made in this submission stand, but we hope that the additional comments made in this document are of value.

We are obliged to you, therefore, for affording us an extension to the deadline for receipt of comments on your consultation.

You will be aware of BWEA's response to the England and Wales Renewables Obligation consultation and to the equivalent consultation in Scotland. Rather than repeating large sections of these, which apply equally to Northern Ireland, we suggest that you consider this document in conjunction with these earlier responses. These are available online at www.britishwindenergy.co.uk/pdf/bwearopc.pdf and www.britishwindenergy.co.uk/pdf/bwearos.pdf

You may also find our near-identical responses to the statutory consultation of interest:

www.britishwindenergy.co.uk/pdf/bwearosc%2004.10.01.pdf and
www.britishwindenergy.co.uk/pdf/bwearosstat%2012.10.01.pdf

You will also be aware that BWEA was the primary body involved with Crown Estates in the design of a process for offshore wind.

At the heart of our approach to policy is the concept of UK-wide policy formulation (in due course, we would expect this to be consistent with EU-wide) policies, thereby anticipating issues regarding compatibility and energy policy integration with Ireland.

In the report, wind is quite rightly recognized as the 'most likely' renewable source for Northern Ireland and the comments made in this submission are largely concerned with wind energy.

You invite specific responses to questions, which are given below.

3.6.1 The changing nature of generation away from large-scale distributed to smaller-scale embedded may present challenges, not problems. May I draw your attention to the NGC paper of Tyson de Souza and Lewis Sale of August 2001, which concluded that *"...comparisons of the potential fluctuations from wind power reported in [this] paper with the size of fluctuations from generation and demand currently accommodated indicates strongly that sufficient frequency response and balancing services would be available to accommodate potential wind developments necessary to meet Government targets for 2010"*.

3.8.1 The target should be, as per UK, a percentage of electricity consumed.

3.8.2 The target should be at least 10% of electricity consumed.

3.8.3 BWEA does not support banding, but does recognise that technologies require different forms of support and commends the relevant trade associations to you. Of the greatest benefit to wind energy would be improved grid access. This would of course, benefit other technologies.

3.8.4 Certain knowledge of a target beyond 2010 will be of enormous significance in ensuring the greatest chance of success for the initial target, in that it will remove any risk of 'playing the market'

4.7.1 History has taught us that the most certain route to establishing renewable energy industries is the establishment of a home market.

4.7.2 Active Government support of companies transferring technology into this market, by the establishment and policing of the market instruments put in place.

- 4.7.3 BWEA does not accept that a single body is desirable or practical. Our considerable experience in the UK in the form of the Confederation of Renewable Energy Associations (soon to be formally dissolved) has confirmed that the interests and needs of the several renewable energy technologies are not always 'in common' and on some issues are irreconcilable. At least one organisation is aspiring to be a single voice for renewable energy, but caution should be expressed in seeking a simple answer to complex questions. Also, BWEA is part of the European Wind Energy Association, which concerns itself primarily with matters related to pan-European policy. We find this an effective avenue to represent our views on international matters.
- 4.7.4 (not numbered) Our comments made to the Performance and Innovation Unit of the Cabinet Office identify the main barriers to the establishment of renewables. See www.britishwindenergy.co.uk/pdf/bweapiuer%2013.09.01.pdf
- 5.5.1 BWEA is of the view that the Renewables Obligation and its sibling the Renewables Obligation (Scotland) present the most sustainable and affordable support mechanisms for growth in the UK at this time. BWEA would, therefore, support the introduction of a similar process in Northern Ireland. **BWEA recommends amending the relevant legislation to enable a UK-wide Renewables Obligation, including trade of ROCs throughout the UK. The Obligation and ROC trading rules should be identical throughout the UK.**
- 5.5.2 The greatest value of such a support mechanism is the signals it sends to the market regarding the need for change.
- 5.5.3 'Community' development can be supported in a number of ways, including commercial partnership. It should be recognised that a very large number of (generally smaller) 'community' schemes would be needed to make a significant contribution to targets and that communities can identify and 'own' larger schemes, where they have been fully involved in the development. Again, we make more detailed comment on this in our PIU submission.
- 5.12.1 See 5.5.1
- 5.12.2 See 5.5.1
- 5.12.3 Yes
- 5.12.4 BWEA does not support a wait and review approach before introduction of an obligation.
- 5.14.1 BWEA supports green pricing where it is transparent.
- 5.14.2 Yes.
- 5.15 'Feed-in' tariffs are a good system for rapid initial development. However, the UK experience is that the obligation is likely to deliver large volumes of renewable electricity at low cost. Long-term European harmonisation issues also need to be considered. Consistent with our UK (and ultimately EU-wide) policy approach, BWEA would not therefore support a feed-in tariff in one part of the UK.
- 5.18 BWEA welcomes continuing discussion of Green Credits/Certificates.

- 5.20 See 5.5.1
- 5.21 Any and all available local support mechanisms should be actively promoted.
- 5.24.1 No NI-specific comment.
- 5.24.2 Capital grants can be particularly useful for encouraging offshore development, but any such grants would need to be integrated into a UK-wide process in order to avoid market distortion.
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- 6.1.1 Absolutely. It is clear that the Prime Minister's references to renewable energy have given a significant fillip to both the existing and prospective industry.
- 6.4 See 5.5.1
- 6.5 See 5.5.1
- 6.6 BWEA believes that renewable energy (and in the case of both the UK at large, and NI in particular) wind energy is the cheapest 'total-cost' form of sustainable generation available. Clear explanation of the economics of power generation and supply are key to securing public support for the cost, rather than the price of generation.

This response will be made available at www.bwea.com in due course.

If we can offer any further assistance or clarification, please do not hesitate to contact me directly.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N.G.', with a horizontal line underneath.

Nick Goodall
Chief Executive

Appendix

BWEA membership at 21 December 2001 (current listing at www.bwea.com)

A2Sea A/S	D.N.V. Ltd
ABB Zantingh Ltd	Dansteel Ltd
ABP Research & Consultancy	DM Energy
AEA Technology Environment	Dowding & Mills Engineering Services
Aegis Rubber Engineering	DP Energy Ltd
Aileron Associates Limited	Dresdner Kleinwort Wasserstein
Airtricity Development Ltd	DSB Offshore Limited
Allen & Overy	Dulas Ltd
Ambient Energy Ltd	E4environment Limited
Amec Wind	Eclipse Energy
Andaray Engineering Ltd	EcoGen Ltd
Anderson Strathern WS	Econnect Ltd
Anglesey Wind & Energy Ltd	Edison Mission Energy Limited
B9 Energy (O&M) Ltd	Edmund Nuttall Limited
Baywind Energy Co-operative Ltd	eeegr, East of England Energy Group
Bendalls Engineering	ELSAM A/S
Bomel Limited	EMU Ltd
Bond Pearce Solicitors	Energiekontor (UK) Ltd
Bonus Energy A/S	Energy for Sustainable Development
Bosch Rexroth Ltd	Energy Unlimited
British Energy plc	ENERTRAG UK Ltd
Brodies W.S., Solicitors	Enron Europe Ltd
Brooks Ltd, Compact Orbital Gears	Enron Wind
Brown & Root Ltd	Entergy Wholesale Operations
Brown McFarlane Ltd	Enviros Aspinwall
Cambrian Engineering (Cymru) Ltd	Ernst & Young
Centre for Economic Renewable Power Delivery	ESB Power Generation, Renewables
Centre for Sustainable Energy	Fairfield Mabey Ltd
Charles W. Taylor & Sons Ltd	Farm Energy Ltd
Chris Blandford Associates	Fugro Limited
Clarke Energy Ltd	Furness Energy Partnership
CLRC, Rutherford Appleton Laboratory	Garrad Hassan & Partners Ltd
Collett Transport Ltd	Global Marine Systems Ltd - Energy Services
Conoco Global Power U.K. Ltd	GPA Partnership
Cornwall Light and Power Co Ltd	Halcrow Group Ltd
Corus	Hammond Suddards Edge
Corus Northern Engineering Services	Harlequin Metal Supplies
Coupe Foundry Ltd	Heath Lambert Group
CREST	Hedley Purvis
CTC Marine Projects	Heriot-Watt University
Cumbria Windfarms Ltd	HR Wallingford
Cwmni Gwynt Teg Cyf	

Hyder Consulting Limited
Hyder Infrastructure Management Ltd
Hydro Soil Services
Impax Capital Corporation
Ingenco Ltd
IT Power Ltd
John Mowlem & Company plc
Keliston Engineering Ltd
Kier Construction Limited
Kvaerner Oil & Gas Ltd
Landscape Design Associates
London Power Company
M & N Wind Power Ltd
Marlec Engineering Co Ltd
Martineau Johnson
Masons
Mayflower Corporation plc
Mersey Docks & Harbour Company
Met Office
Metoc plc
Mitsui Babcock Energy Ltd
Mobil Oil Company Ltd
Nabarro Nathanson
National Energy Foundation
National Engineering Laboratory
National Wind Power Ltd
Natural Power Consultants Ltd
NEG Micon UK Ltd
Nicholas Grimshaw & Partners
Nordex UK Ltd
North Energy Associates Ltd
Northern Electric Generation Ltd
Norton Rose
Nsure Renewables
Oceans Engineering Ltd
ODE, Offshore Design Engineering Ltd
Offshore Energy Resources Limited
Open University
Orga Suisse S.a.r.l
Osborne Clarke
Pirelli Cables Ltd
PMSS Ltd
Posford Haskoning Ltd
PowerGen Renewables Ltd
Proven Engineering Products Ltd
QinetiQ Ltd
R.D.C. Ltd
Renew North
Renewable Energy Systems Ltd
RenGen Ltd
Repower Systems AG
ReSoft Ltd
Riomay Ltd
RMB Engineering Services
Royal & SunAlliance
RSK Environment Limited
Scottish & Southern Energy plc
ScottishPower
Seabed Scour Control Systems Ltd
Seacore Ltd
Shell International Renewables Ltd
SLP Energy Ltd
Stephenson Halliday
Sustainable Energy Limited
Thales Geosolutions
Theodore Goddard
Titan Environmental Surveys Ltd
Titan Maritime (UK) Ltd
TLT Solicitors
TMEEnvironmental Power
Tomen Power Corporation UK Ltd
Triodos Bank
TXU Europe Power Ltd
UMIST
unit[e]
United Utilities Green Energy
University of Durham
University of the West of England
Vector Instruments
Vestas - Danish Wind Technology A/S
Warwick Energy Limited
Wavegen
West Coast Energy Ltd
Western Windpower
Wichita Co. Ltd
Wind Prospect Ltd
Windelectric Ltd
Windforce Energy Development Ltd
WindGeneration Ltd
Windjen Power Limited
Wragge & Co
Wrigleys Solicitors
Yorkshire Windpower Ltd