

Dr Marilyn Booth
Sustainable Energy Policy Unit
Department of Trade and Industry
Room 1116
1 Victoria Street
London
SW1H 0ET



5 October 2001

Dear Marilyn

**The Renewables Obligation Statutory consultation
Response from the British Wind Energy Association**

The British Wind Energy Association, representing the interests of more than 160 companies* active in the UK wind energy market wishes to make the following comments in response to the statutory consultation.

We actively seek a 'soonest-possible' implementation of the obligation.

We dispute the calculations made for carbon costs and draw your attention to the detailed note separately provided by David Milborow on this matter.

We note the unnecessary complications of the arrangements made for on-site generators in order to acquire ROCS and advise Government of the increasing interest in on-site generation being shown by companies new to wind. This is unlikely to result in development unless a low-cost solution is found.

We note the potential abuse of the hydro refurbishment provisions if projects greater than 20MW were allowed to shrink below the threshold.

We recommend that 'banking' should be allowed for both generators and suppliers.

Yours sincerely

Nick Goodall
Chief Executive

*'BWEA Membership at 10.01'

Amec Wind
Bonus Energy A/S
Enron Wind
National Wind Power Ltd
Powergen Renewables Ltd
Renewable Energy Systems Ltd
ScottishPower
Shell International Renewables Ltd
TXU Europe Power Ltd
ABB Zantingh Ltd
AEA Technology Environment
Aegis Rubber Engineering
B9 Energy (O&M) Ltd
Bond Pearce Solicitors
British Energy plc
Brodies W.S., Solicitors
Brown & Root Ltd
Clarke Energy Ltd
Conoco Global Power U.K. Ltd
Corus Bi-Steel Solutions
Corus Northern Engineering Services
D.N.V. Ltd
DERA
Dresdner Kleinwort Wasserstein
Edison Mission Energy Limited
ELSAM A/S
Energiekontor (AG)
ENERTRAG UK Ltd
Enron Europe Ltd
Ernst & Young
Fugro Limited
Garrad Hassan & Partners Ltd
Hydro Soil Services
Ingenco Ltd
John Mowlem & Company plc
Keliston Engineering Ltd
Kier Construction Limited
Kvaerner Oil & Gas Ltd
Lilley Grant Rush Ltd
London Power Company
M & N Wind Power Ltd
Masons

Mayflower Corporation plc
Met Office
Mitsui Babcock Energy Ltd
Mobil Oil Company Ltd
Natural Power Consultants Ltd
NEG Micon UK Ltd
Nordex UK Ltd
Northern Electric Generation Ltd
Norton Rose
Offshore Energy Resources Limited
Pirelli Cables Ltd
R.D.C. Ltd
Royal & SunAlliance
Scottish & Southern Energy plc
Seacore Ltd
SLP Engineering Ltd
Tomen Power Corporation UK Ltd
Triodos Bank
Umweltkontor Deutschland
Renewable
Energy AG
United Utilities Green Energy
Vestas - Danish Wind Technology
A/S
Warwick Energy Limited
Wind Prospect Ltd
Windelectric Ltd
Windforce Energy Development Ltd
Windjen Power Limited
Wragge & Co
Yorkshire Windpower Ltd
A2SEA A/S
ABP Research & Consultancy
Aileron Associates Limited
Airtricity Development Ltd
Ambient Energy Ltd
Andaray Engineering Ltd
Anderson Strathern WS
Anglesey Wind & Energy Ltd
Baywind Energy Co-operative
Bendalls Engineering
Bomel Limited
Bosch Rexroth Ltd
Brown McFarlane Ltd

Cambrian Engineering (Cymru) Ltd
Charles W. Taylor & Sons Ltd
Chris Blandford Associates
Collett Transport Ltd
Cornwall Light and Power Co Ltd
Coupe Foundry Ltd
Cumbria Windfarms Ltd
Cwmni Gwynt Teg Cyf
Dansteel Ltd
DM Energy
DP Energy Ltd
DSB Offshore Limited
Dulas Ltd
E4environment Limited
Eclipse Energy
EcoGen Ltd
Econnect Ltd
eeegr, East of England Energy Group
EMU Ltd
Energy for Sustainable Development
Energy Unlimited
Enviros Aspinwall
ESB Power Generation, Renewables
Fairfield Mabey Ltd
Farm Energy Ltd
Furness Energy Partnership
Galeforce Wind Turbines (N.I.) Ltd
Global Marine Systems Ltd
GPA Partnership
Halcrow Group Ltd
Hammond Suddards Edge
Harlequin Metal Supplies
Hedley Purvis
HR Wallingford
Impax Capital Corporation
IT Power Ltd
Landscape Design Associates
Marlec Engineering Co Ltd
Mersey Docks & Harbour Company
Metoc plc
National Engineering Laboratory
Nicholas Grimshaw & Partners
North Energy Associates Ltd
Oceans Engineering Ltd

ODE, Offshore Design Engineering
Ltd
Orga Suisse S.a.r.l
PMSS Ltd
Proven Engineering Products Ltd
Renew North
ReSoft Ltd
Riomay Ltd
RMB Engineering Services
RSK Environment Limited
Seabed Scour Control Systems Ltd
Stephenson Halliday
Sustainable Energy Limited
Thales Geosolutions
Theodore Goddard
Titan Environmental Surveys Ltd
Titan Maritime (UK) Ltd
TLT Solicitors
TMEEnvironmental Power
unit[e]
Vector Instruments
Wavegen
West Coast Energy Ltd
Western Windpower
Wichita Co. Ltd
Windfarm Construction &
Maintenance
Ltd. (WCM)
WindGeneration Ltd
Wind-Ways Ltd
Wrigleys Solicitors
Centre for Economic Renewable
Power
Delivery
Centre for Sustainable Energy
CLRC, Rutherford Appleton
Laboratory
CREST
National Energy Foundation
Open University
UMIST
University of Durham
University of the West of England