Response ID ANON-6UWA-D9XC-U

Submitted on 2015-09-09 13:09:12.915474

Introduction

1 What is your name?

Name:
Jon Bird

2 What is your email address?

Email:
jon.bird@sustainabilityfirst.org.uk

3 What is your organisation?

Organisation:
Sustainability First

General information

Executive Summary

Background

Securing value for money

4 Do you agree or disagree with the proposed generation tariff rates set out above? Please provide reasons to support your answer.

Neither agree nor disagree

Please add your comments here:
DECC must set whatever tariffs it sees fit. But the lack of advance warning for the current review and the vagueness of the wording in paras 48 and 49 about the likelihood and timing of any future reviews can at best add to the cost of capital for FIT-related projects or at worst discourage investors altogether. In the interests of cost-effectiveness, DECC must commit now to a timetable for future reviews and to the criteria it would apply to such a review. A balance must be struck between safeguarding expenditure under the LCF and safeguarding the interests of investors (see 'Let's get it right', a recent paper by Sustainability First, sent to the Secretary of State in June this year).

Please upload any further supporting evidence :
Sustainability First - Let's Get It Right - A Suggested Framework for Low Carbon Interventions - Discussion Document - June 2015 - Final Revise.pdf was uploaded

5 Do you agree or disagree that the updated assumptions produced by Parsons Brinckerhoff are reflective of the current costs of deployment for UK projects in your sector? If you disagree, please set out how they differ and provide documented evidence, such as invoices and/or contractual agreements to support this evidence. Please also mark this evidence as commercially sensitive where appropriate.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

6 Do you consider the proposed default degression pathways fairly reflect future cost and bill savings assumptions in your sector? Please provide your reasoning, supported by appropriate evidence where possible.

Don't know

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

7 Do you consider it appropriate to harmonise the triggers for contingent degression across all technologies, and do you consider the proposed triggers will ensure tariffs reflect falling deployment costs? Please provide your reasoning, supported by appropriate evidence where possible.

Don't know

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

8 Which of the options for changing the export tariff outlined above would best incentivise renewable electricity deployment while controlling costs and enabling the development of the PPA market? How should we account for the additional and avoided costs to suppliers associated with exports in setting the export tariff? Please provide reasons to support your answer.

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

9 Do you agree or disagree with the proposed changes to the indexation link under the FITs scheme? Please provide reasons to support your answer.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

10 Do you agree or disagree with the proposal not to include any additional technologies in the FITs scheme? Please provide reasons for your response.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

Cost control measures

11 Do you agree or disagree with the proposal to introduce deployment caps under the FITs scheme? Please provide your reasoning.

Agree

Please provide your comments:
Although not desirable, deployment caps at least provide greater predictability about future intentions for investors than the current practice of unheralded reviews.

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

12 Do you agree or disagree with the proposed design of the system of caps (i.e. quarterly deployment caps broken down by technology and degression band)? If you disagree, are there any alternative approaches? Please provide your reasoning, making clear if your answer is different for different technologies or sectors.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

13 Do you agree or disagree with the proposed approach to implementing caps? If you disagree, are there any alternative approaches that you'd suggest? Please provide your reasoning, making clear if your answer is different for different technologies or sectors and provide any views on what should happen to applications for FITs for installations which miss out on a cap.

Don't know

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

14 If it is not possible to sufficiently control costs of the scheme at a level that Government considers affordable and sustainable, what would be the impact of ending the provision of a generation tariff for new entrants to the scheme from January 2016 , ahead of the 2018-19 timeframe or, alternatively, further reducing the size of the scheme's remaining budget available for the cap? Please consider the immediate and broader economic impacts and provide your reasoning.

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

15 What would be the impact of pausing applications to FITs for new generators for a short specified period to allow the full implementation of the cost control mechanisms? Please consider the immediate and broader economic impacts and provide your reasoning.

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

16 What would be the impact if FITs continued as an export-only tariff for new generators on reaching the cap of £75-100m additional expenditure? Please provide your reasoning.

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

17 Do you have any views on the use of competition to prioritise applications within a system of caps? What do you think are the advantages and disadvantages of this approach? What forms of competition may be appropriate and is this different for different sorts of installations? Please provide your reasoning.

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

18 Should FITs be focussed on either particular technologies or particular groups (e.g. householders)? Please provide your reasoning.

Not Answered

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

19 Do you agree or disagree with the proposal to remove the ability of new installations to extend their capacity under the FITs scheme? Please provide your reasoning

Not Answered

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

Metering export and generation – smart meters and other options

20 Given our intention to move to fully metered exports for all generators, do you agree with the proposal that new and existing generators should be obliged to accept the offer of a smart meter (or advanced meter) when it is made by their supplier? Please provide reasoning for your response.

Agree

Please provide your comments:
This is a sensible way forward, but the consultation fails to recognise that a customer's FIT licensee may not be his electricity supplier. Since smart meter privacy requirements restrict access to smart meter data to the customer and his energy supplier, the law may need to be changed to allow the FIT licensee to access the data.

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

21 Do you agree or disagree with the alternative proposal that new applicants must have a smart meter (or advanced meter) installed before applying to the FITs scheme, with existing generators being obliged to accept the offer of a smart meter (or advanced meter) when it is made by their supplier? Please provide reasoning for your response.

Agree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

22 Do you have any views on possible approaches to introducing remote reading for generation meters? Please provide reasoning for your response.

Please provide your comments:
The consultation fails to recognise that a customer's FIT licensee may not be his electricity supplier. Since smart meter privacy requirements restrict access to smart meter data to the customer and his energy supplier, the law may need to be changed to allow the FIT licensee to access the data.

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

Effects of the Feed-in Tariffs scheme on grid management and costs

23 Do you agree or disagree that recipients of FITs should be required to notify the relevant DNO of new installations as a condition of the scheme?

Agree

Please provide your comments:
This question is wrongly posed, since as para 136 recognises there is an existing obligation to inform the DNO under the G83 process. however, from a comparison of FIT data with G83 notifications, it is clear that up to half all PV installations fail to be notified to the DNO. Smart meter data will not necessarily fill the gap since DNOs will only be allowed to access aggregated data (the detail of this has yet to be settled). FIT applications and G83 notifications contain almost identical information and so a sensible solution would be amend the data protection provisions and ensure that a copy of the FIT application (without which no FIT will be paid) is sent to the DNO.

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

24 Do you agree or disagree the FITs scheme should be amended to include requirements that help mitigate and limit the impact on grids such as requiring generation to be co-located with demand or storage?

Disagree

Please provide your comments:
This sort of administrative approach is unlikely to be cost-effective. The better answer would be an economically driven solution that produces the cheapest solution, whether that be network reinforcement or some other customer-related option.

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

25 Do you agree or disagree the FITs scheme or wider networks regime should be amended to ensure generators pick-up the costs they impose on the network?

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

Ensuring sustainability for anaerobic digestion

26 Do you agree or disagree that payments to newly accredited AD installations, at all scales, are conditional on meeting the proposed sustainability criteria? Please provide your reasoning.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

27 Do you agree or disagree that the proposed criteria and GHG trajectories set out above would set the necessary bar to meet our objective to incentivise the multiple benefits from waste-fed AD? Can you suggest alternative criteria which would help to achieve this goal? Please provide reasoning and evidence for your answer.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

28 Do you agree or disagree with the proposed reporting system to underpin sustainability criteria? Please provide your reasoning.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

Administrative changes to the Feed-in Tariff scheme

29 Do you agree or disagree that only imported renewable electricity produced by generators in other EU Member States that are under 5MW and commission on or after 1 April 2010 should be used to offset levelisation costs? Please provide your reasoning.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

30 Do you agree or disagree that we should introduce a cap on the amount of overseas generated renewable electricity that can be exempt from the costs of the scheme? Do you agree that the cap for 2016/17 should be calculated based on the number of GoOs recognised in 2013/14, increased by 10% twice to match the cap under the CFD Supplier Obligation?

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

31 Do you agree or disagree with the proposed change to the FITs legislation to refer to specific versions of relevant MCS standards? Please provide your reasoning.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

32 Do you agree or disagree with the Government's proposal to use interest accrued on the FITs Levelisation Fund to part-fund administrative changes to the scheme which would otherwise be borne through public funding? Please provide your reasoning.

Neither agree nor disagree

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

Energy efficiency criteria

33 Do you agree or disagree with the revision being considered to increase the energy efficiency threshold to EPC band C for anyone with an installation to which the criteria apply? Please provide your reasoning.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

34 Do you agree or disagree with the revision being considered to remove FITs eligibility from anyone with an installation to which the criteria apply who does not have at least an EPC band C? Please provide your reasoning.

Neither agree nor disagree

Please provide your reasoning:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded

35 Do you agree or disagree with the exceptions for community groups, schools and fuel poor households to the revision to the energy efficiency criteria being considered? Please provide your reasoning.

Neither agree nor disagree

Please provide your comments:

Please upload any further supporting evidence (e.g. PDFs, Excel files):
No file was uploaded