

Christopher Osborne

From: Cahoon, Gillian <Gillian.Cahoon@detini.gov.uk>
Sent: 29 January 2016 12:07
To: Christopher Osborne
Subject: RE: Support for Small scale (non-cluster) wind and proposed closure of Northern Ireland Renewables Obligation to new Onshore Wind - Letter from UFU, Simple Power, Renewables NI and Wind NI

Christopher

Your request has been received and is being processed. A response will issue in due course.

Regards

Gillian Cahoon

Private Office
Department of Enterprise, Trade & Investment
Netherleigh
Massey Avenue
Belfast, BT4 2JP
Tel: 028 9052 9440 (ext: 29440)

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TextRelay: 18001 028 9052 9440
Web: www.detini.gov.uk



NI Year of Food & Drink 2016

Please consider the environment - do you really need to print this e-mail?

From: Christopher Osborne [mailto:christopher@ufuhq.com]
Sent: 29 January 2016 11:57
To: Cahoon, Gillian
Subject: FW: Support for Small scale (non-cluster) wind and proposed closure of Northern Ireland Renewables Obligation to new Onshore Wind - Letter from UFU, Simple Power, Renewables NI and Wind NI
Importance: High

Good morning Gillian,

Please find attached an email I sent the Private Office on Wednesday morning. Despite having sent this over 2 days ago, we have not received an acknowledgement. Such is the urgency of this, I am writing to you directly to make sure that it is has been received.

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I look forward to hearing from you.

Chris Osborne

From: Christopher Osborne

Sent: 27 January 2016 08:31

To: 'Private.office@detini.gov.uk'

Cc: 'committee.eti@niassembly.gov.uk'; 'Patsy.mcglone@mla.niassembly.gov.uk'; 'Paul.givan@mla.niassembly.gov.uk'; 'Gordon.dunne@mla.niassembly.gov.uk'; 'mauricemorrow@hotmail.com'; 'William.humphrey@mla.niassembly.gov.uk'; 'conormurphysf@gmail.com'; 'Megan.fearon@mla.niassembly.gov.uk'; 'Mairtin@newbelfast.com';

'Fearghal.mckinney@mla.niassembly.gov.uk'; 'Adrian.cochrane-watson@mla.niassembly.gov.uk';

'Steven.agnew@mla.niassembly.gov.uk'; 'Private.office@dardni.gov.uk'; 'committee.agriculture@niassembly.gov.uk';

'William.irwin@mla.niassembly.gov.uk'; 'Ps.ministers@ofmdfmi.gov.uk'; 'William.irwin@mla.niassembly.gov.uk'

Subject: Support for Small scale (non-cluster) wind and proposed closure of Northern Ireland Renewables Obligation to new Onshore Wind - Letter from UFU, Simple Power, Renewables NI and Wind NI

Importance: High

Good morning Minister.

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Please find attached a letter from UFU, Simple Power, Renewables NI and Wind NI regarding support from small scale (non-cluster) wind and the proposed early closure of the NIRO. We would be grateful if you would give it due consideration.

We look forward to hearing from you.

Chris Osborne

UFU Senior Policy Adviser

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475 Antrim Road T: 028 9037 0222
 Belfast F: 028 9037 1231
 BT15 3DA E: info@ufuhq.com
 W: www.ufuni.org

26th January 2016

Mr Jonathan Bell MLA
 DETI Minister
 Netherleigh House
 Massey Avenue
 BELFAST
 BT4 2JP

RE: Support for Small scale (non-cluster) wind and proposed closure of Northern Ireland Renewables Obligation to new Onshore Wind

STRICTLY WITHOUT PREJUDICE

Dear Minister,

Further to our letter of 25th November 2015 and subsequent events including the commencement of judicial review proceedings against DETI, I write to set out below the views of the UFU, Simple Power, Renewable NI and Wind NI.

As things stand, we understand the large scale wind industry in Northern Ireland has accepted the proposals set out within your published *Onshore Wind NIRO Closure consultation* published on 30 September 2015.

Given the well documented exceptional circumstances and challenges affecting the small scale wind industry we do not accept the proposals. We appreciate that a protracted dispute on this issue serves the interests of no-one and as such we wish to put forward for your immediate consideration a proposed solution for the small scale wind industry.

We are mindful that the Stormont ETI Committee supports our attempts to secure a better deal around the NIRO closure for small scale wind and also wishes to see a resolution of this issue within the current Assembly mandate i.e. before March 18th 2016.

We would like you to consider the spirit by which we bring this proposal forward in an attempt to ensure a fair outcome for all parties concerned. We would also wish to make clear that our proposal is only intended to facilitate existing 'live' projects that have been stalled for various reasons beyond our control.

Proposal

We propose that DETI issues a revised public consultation for NI small scale wind (<250kW) which sets out the following amended NIRO closure timeline and a phased 'step-down' grace period designed to recognise the unique grid (and radar) challenges faced by small scale wind in Northern Ireland, as well as the need for DECC to close the NIRO scheme. We propose:

- i. NIRO closure for small scale wind on 31st March 2017; and
- ii. a phased 'step down' grace period which applies as follows:
 - a. Connection by 31st March 2018 – 20 year NIRO support
 - b. Connection by 31st March 2019 – 19 Year NIRO support
 - c. Connection by 31st March 2020 – 18 Year NIRO support

The qualifying eligibility criteria for access to this amended closure scheme would be conditioned for small scale wind turbine installers/developers as follows:

- i. *Demonstrate that they have a planning application for a small scale turbine submitted no later than 31st March 2016 and planning consent no later than 31st March 2017; (this will allow for planning decisions delayed due to RPA) &*
- ii. *Demonstrate that they have a valid grid connection application submitted no later than 31st March 2016; (this will allow NIE more time to issue grid connection offers as they currently have adopted a freeze since September 2015 until May 2016) &*
- iii. *Provide a Director's Certificate confirming that as of 30th September 2016, the developer or proposed operator of the station owns the land on which the station is to be situated or has an option or agreement to lease the land or is party to an exclusivity agreement in relation to the land. (This will allow some projects needing legal issues resolved an opportunity to resolve the outstanding issues.)*

Projects that satisfy these criteria and for which they will need to apply to Ofgem, would be able to accredit under the NIRO up to 31 March 2017. If they cannot accredit by that date due to grid or radar delays, they may apply for access to the 'step down' grace period scheme as explained earlier.

We feel this 'step down' grace period approach is a fair and balanced solution for the small scale wind industry. It is designed to assist 'live projects' – not open the door for new projects. In addition, the 31st March 2016 cut-off qualifying date should allow DETI sufficient time to issue a new consultation for small wind and provide reassurance to the sector that the consultation is fair and equitable.

We estimate that this proposal will enable, at most, an additional 80-100 small scale wind projects to get 'across the line to energisation' and qualify for the NIRO. We feel this would represent a genuine, affordable and fair attempt by DETI and DECC to address the unique problems faced by small wind in NI.

Following on from the NIRO closure, we would also wish to reiterate our call to DETI to examine the potential for introducing a FIT scheme for small scale wind and other small scale renewables. We note that the potential for an all-island FIT has been discussed and we would welcome the chance to explore this with DETI.

Given the urgency of these matters we would request that we meet with you as soon as possible to discuss this proposal and find a resolution to this matter.

Yours sincerely



CHRIS OSBORNE
UFU Senior Policy Officer

Cc
OFMDFM Ministers
ETI Committee members