

## **Feed-in Tariffs Scheme**

# **Government Response to Consultation on Comprehensive Review Phase 1 – Tariffs for solar PV**

9 February 2012

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## Executive Summary

### Introduction

1. On 31 October 2011, the Government published a consultation on Feed-in Tariffs (FITs) for solar photovoltaics (PV). This document sets out the Government's response to the consultation. Views were sought on proposals to:
  - reduce the generation tariffs for solar PV installations to a more sustainable level consistent with providing a reasonable rate of return;
  - apply the new generation tariffs from 1 April 2012 to all new solar PV installations with an eligibility date on or after an earlier 'reference date', which we proposed should be 12 December 2011;
  - introduce new multi-installation tariff rates for aggregated solar PV schemes i.e. where a single individual or organisation owns or receives FITs payments from more than one solar PV installation, located on different sites; and
  - strengthen the link between FITs and energy efficiency by introducing a new energy efficiency requirement for FITs for solar PV for installations after 1 April 2012.
2. The consultation closed on 23 December 2011 and a total of 2,393 consultation responses were received which we have analysed carefully. In the light of that analysis, this document sets out as far as possible, within the constraints imposed by ongoing legal proceedings<sup>1</sup>, the Government's decisions regarding solar PV support within the FITs scheme.

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<sup>1</sup> On 25 January 2012, the Government lost its appeal to the Court of Appeal in *Secretary of State for Energy and Climate Change v. Friends of the Earth and others* [2012] EWCA Civ 28. We respectfully disagree with the judgment and intend to apply to the Supreme Court for permission to appeal. The time limit for doing so is 28 days from the date of the Court of Appeal's decision.

## Overview of policy decisions

3. The Government's decision on the new tariffs for solar PV, following the consultation published last October, was announced on 19 January 2012.<sup>2</sup> Subject to the parliamentary process required by the Energy Act 2008, the licence modifications necessary to implement the new tariffs will come into force on or before 3 March 2012, and will apply the new tariffs from 1 April 2012 to any new solar PV installation with an eligibility date on or after 3 March 2012. We cannot give certainty for installations with an eligibility date on or after the proposed 12 December 2011 reference date, and before 3 March 2012, due to the outstanding legal action. However, if the tariffs for those installations are reduced, they will receive tariffs not lower than those proposed in the phase 1 consultation.
4. We have decided to proceed with an energy efficiency requirement for new solar PV installations with an eligibility date on or after 1 April 2012, as a pre-requisite of eligibility for the standard solar PV tariff rates. This will mean that new FITs applications for solar PV will need to demonstrate that the building to which the solar PV installation is attached or wired to provide electricity has an Energy Performance Certificate rating of Level D or above. This specific requirement is a change from the original two options considered, taking into account consultation responses, but with the same general intent.
5. In addition, we have decided to proceed with multi-installation tariff rates which will apply to all new solar PV installations with an eligibility date on or after 1 April 2012 where the FIT generator or the nominated recipient for FIT payments receives FITs income from more than twenty five solar PV installations, located on different sites. This is also a change to the original proposal, under which any FIT generator or nominated recipient with more than one installation would have received the multi-installation tariff. The Phase 2A consultation document, which is also published today, sets out proposals for additional future changes to the application of the new multi-installation tariff rates.

## Overview of consultation response analysis

6. The consultation asked eleven questions. Five questions related to proposals to change the tariff rates (including the introduction of the multi-installation tariff rates) and timing of this change, and six questions related to proposals to make eligibility for the standard tariffs contingent upon meeting specified energy efficiency requirements. The full list of questions is at Annex A. We received 2,393 responses, of which 22% (530 responses) were from industry<sup>3</sup> and 55% (1,311 responses) were from individuals.

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<sup>2</sup> See *Government response to question 1 of Feed-in Tariffs scheme: Consultation on Comprehensive Review Phase 1 – tariffs for solar PV*, available at <http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/renewable-energy/4140-gov-response-q1-fits-solar-pv-cons.pdf>.

<sup>3</sup> Including the following categories: industry, construction, manufacturer, private company, supplier, trade association.

7. 81% of respondents disagreed with the proposed new tariffs for solar PV installations and with the proposed reference date of 12 December 2011, compared to 12% who agreed. 34% of respondents agreed with the principle of the proposed new multi-installation tariff rates, while 37% disagreed. Of those that answered the questions, 45% disagreed with the proposed multi-installation tariff rates, while 21% agreed.
8. 35% of respondents agreed with the proposal of making FITs for solar PV contingent on meeting a minimum energy efficiency requirement, while 43% disagreed. In terms of the proposals for what the energy efficiency requirement should be, 19% of respondents agreed with option 1 (achieve a specified EPC rating) in respect of dwellings, and 22% in respect of non-domestic buildings. 27% of respondents agreed with option 2 (undertaking all the measures that are identified on an EPC as potentially eligible for Green Deal finance) in respect of dwellings, and 28% in respect of non-domestic buildings.
9. Some argued that there should be no energy efficiency requirement, and many argued that the Green Deal should be established before it is used to link FITs and energy efficiency. Some argued for alternatives; there was no consensus around what alternative would be preferred, although most respondents said the requirement should be simple, inclusive, and achievable.

## Part 1 | Policy decisions

### Government decision on new solar PV tariffs

10. On 19 January 2012 the Government announced its decision in relation to new solar PV tariffs, taking into account an analysis of the responses received to Question 1 in the phase 1 consultation document. In bringing forward this decision ahead of the wider Government response to the consultation, our aim was to alleviate the uncertainty pending the outcome of the legal proceedings in relation to the Government's consultation proposals.
11. As stated at the time, we intend to give effect to the new tariffs by amending the FIT payment rate table in Annex 2 to Condition 33 of the Standard Conditions of Electricity Supply Licences, subject to the parliamentary process set out in the Energy Act 2008. Our intention is that these amendments will be made on or before 3 March 2012, following completion of the 40 day period of laying before Parliament required by section 42 of the Energy Act 2008, and will come into effect on 3 March 2012, applying to all installations with an eligibility date on or after that date.

### Tariff changes

12. As confirmed on 19 January 2012, the following changes will be made to the generation tariff levels for all installations with an eligibility date on or after 3 March 2012.<sup>4</sup>

Band (kW)	Current generation tariff (p/kWh)	New generation tariff from 1 April 2012 (p/kWh)
≤4kW (new build)	37.8	21.0
≤4kW (retrofit)	43.3	21.0
>4-10kW	37.8	16.8
>10-50kW	32.9	15.2
>50-100kW	19	12.9
>100-150kW	19	12.9

<sup>4</sup> It is important to note that the eligibility date of a solar PV installation is likely to be after its installation date, since the installation must have been commissioned and an application for FITs must have been received by a FIT Licensee (or Ofgem, in the case of installations with a capacity greater than 50kW).

"Eligibility Date" is defined in Condition 33 of the Standard Conditions of Electricity Supply Licences as:  
"the date as regards a particular Eligible Installation from which eligibility for FIT Payments commences which shall be the later of the date:  
(a) as applicable, of  
(i) receipt by the Authority of a FIT Generator's written request for ROO-FIT Accreditation in a form acceptable to the Authority; or  
(ii) receipt by a FIT Licensee of a FIT Generator's written request for MCS-certified Registration;  
(b) on which the Eligible Installation is Commissioned; or  
(c) of Implementation".

>150-250kW	15	12.9
>250kW-5MW	8.5	8.9*
stand alone	8.5	8.9*

\* These are the current tariffs which were not changed through the phase 1 consultation but which, like all other current tariffs (but not the new tariffs) will be adjusted in line with the Retail Price Index from 1 April 2012 to the levels set out in the table.

13. In practice, this would mean that from 1 April 2012, solar PV generators with an eligibility date on or after 3 March 2012 would be eligible for a lower tariff (as set out in the table above). In line with the proposals set out in the consultation document, generators with an eligibility date between *and including* 3 March 2012 and 31 March 2012 would be eligible for the current tariffs in respect of electricity generated in this period only (i.e. for less than a month), before moving onto the lower tariffs from 1 April 2012.

### Proposed “reference date”

14. The Government’s proposal to apply new tariffs for solar PV from 1 April 2012 to all new installations with an eligibility date on or after an earlier “reference date” (which we proposed should be 12 December 2011) is the subject of a judicial review.<sup>5</sup> The Government is seeking permission to appeal to the Supreme Court, following a decision by the Court of Appeal on 25 January 2012. Pending the outcome of that process, no decision has yet been taken on the generation tariffs for solar PV installations with an eligibility date on or after the proposed 12 December 2011 proposed reference date and before 3 March 2012.

15. For the avoidance of doubt, **if the Government wins an appeal to the Supreme Court, we reserve the right to stand by our original proposal. This means the Government could make further licence modifications in future which would reduce the generation tariffs in respect of electricity generated from the date those licence modifications are made, for some or all installations with an eligibility date on or after 12 December 2011 and before 3 March 2012. This would be subject to the Parliamentary procedure in the Energy Act 2008.**

16. However, in the event that the Government wins an appeal, we can confirm that the tariffs for which those generators will be eligible will be no lower than the new tariffs set out in the third column of the above table. They will also continue to receive the current, higher tariff for electricity they generate until the Government has made new modifications to the FIT payment rate table in Annex 2 to Condition 33 of the Standard Conditions of Electricity Supply Licences. The timing of any change will depend on the

<sup>5</sup> The Secretary of State for Energy and Climate Change issued a Written Ministerial Statement on 26 January 2012 which provided an update on the legal proceedings. This is available at [http://www.decc.gov.uk/en/content/cms/news/chrishuhne\\_fit/chrishuhne\\_fit.aspx](http://www.decc.gov.uk/en/content/cms/news/chrishuhne_fit/chrishuhne_fit.aspx)

length of the appeal process to the Supreme Court and will be subject to the Parliamentary process set out in the Energy Act 2008.

## Government decision on multi-installation tariff rates

### Consultation proposals

17. The proposal set out in the Phase 1 consultation was to offer lower tariffs, set at 80% of the standard tariff, for new installations where the FIT generator or nominated recipient owns or receives FITs payments for one or more other solar PV installations, located on different sites. This was to avoid over-compensation for those in receipt of FITs payments, given the economies of scale that arise from developing a large number of similar sites. The proposal did not identify a minimum threshold for application i.e. it would apply to any organisation that owned more than one site.

### Stakeholder feedback

18. Respondents were divided in their views regarding the proposed multi-installation tariff rates. 34% of respondents agreed with the proposal to introduce a multi-installation rate. However, 37% disagreed with the proposal. 29% did not answer this question. 21% agreed with the proposed multi-installation rate, but 45% disagreed. 34% did not answer this question. Further detail of this analysis can be found in Part 2 of this document.

### Way forward

19. We remain convinced of the need to introduce multi-installation tariff rates to ensure that those involved in so-called aggregated projects are not overcompensated, particularly given the potential economies of scale available to them compared to individual generators. We therefore intend to implement new multi-installation tariff rates from 1 April 2012.

20. However, responses to the consultation and other feedback suggested that an unintended consequence of the proposed multi-installation tariff rates would be to disadvantage some individual developers who operate more than one site but not enough sites to benefit from any economies of scale. This category of developers may include councils, NHS trusts or SMEs as well as community energy organisations that have installations spread across a small number of buildings.

21. In the light of this evidence, we have therefore decided to increase the threshold at which the multi-installation tariff rates will apply. The rates will apply to any solar PV installation where the FIT generator or nominated recipient owns or receives FITs payments from **25** or more other solar PV installations, located on different sites, rather than one or more as originally proposed. It is important to note that where a FITs generator or nominated recipient is connected (within the meaning of section 1122 of the Corporation Tax Act



2010<sup>6</sup>) to one or more other persons that are also FIT generators and/or nominated recipients, the solar PV installations associated with those other connected persons will also be considered in determining whether or not the threshold has been met and the multi-installation tariff rates are applicable.

22. The multi-installation tariff rates will apply to all new solar PV installations with an eligibility date on or after 1 April 2012 which meet the following criteria.

- (i) The FIT generator (whether or not the person in receipt of FIT payments), taken together with any connected persons, is either the FIT generator or the nominated recipient for FIT payments for 25 or more other solar PV installations (regardless of whether these other solar PV installations have an eligibility date before or after 1 April 2012).
- (ii) The nominated recipient for FIT payments (where there is one), taken together with any connected persons, is either the FIT generator or the nominated recipient for FIT payments for 25 or more other solar PV installations (regardless of whether these other solar PV installations have an eligibility date before or after 1 April 2012).
- (iii) There is a transfer of ownership or rights to FIT payments from one FIT generator or nominated recipient who is eligible for the standard tariffs, to another who meets criteria (i) or (ii).

23. Once the multi-installation tariff rates have applied to an installation, the higher rates cannot subsequently apply to it, even if ownership or the right to FIT payments is transferred to a person who does not meet the above criteria.

24. In setting the threshold at 25, we have been mindful of the need to minimise the scope for generators to artificially circumvent the criteria set out above, in order to secure the standard tariff rates, and we have included the “connected persons” provision for this reason. In general, the Government takes a very serious view of any evidence of fraud in relation to public subsidies such as FITs, and will be fully supportive of measures taken by Ofgem and FIT licensees to address evidence of fraudulent behaviour.

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<sup>6</sup> <http://www.legislation.gov.uk/ukpga/2010/4/section/1122>

## Multi-Installation tariff rates

25. The Government intends to introduce the new multi-installation tariff rates by amending the FIT payment rate table in Annex 2 to Condition 33 of the Standard Conditions of Electricity Supply Licenses, subject to the Parliamentary process set out in the Energy Act 2008. Our intention is that these amendments will be made by 1 April 2012, following completion of the 40 day period of laying before Parliament required by section 42 of the Energy Act, and will come into effect on 1 April 2012, applying to all installations with an eligibility date on or after that date that meet the criteria described above.
26. The multi-installation tariff rates which will apply are set out in the table below. The rates are set at 80% of the standard tariffs for individual installations. These are based on evidence which suggested that the economies of scale associated with aggregated projects mean that a lower tariff is necessary to deliver a rate of return equivalent to that available under the standard tariffs for a well located installation that is not part of an aggregated scheme.

Band	Multi-installation generation tariff (p/kWh)
≤4kW (new build)	16.8
≤4kW (retrofit)	16.8
>4-10kW	13.4
>10-50kW	12.2
>50-100kW	10.3
>100-150kW	10.3
>150-250kW	10.3
>250kW-5MW	8.9*
stand alone	8.9*

\* These are the current tariffs which were not changed through the phase 1 consultation but which, like all other current tariffs (but not the new tariffs) will be adjusted in line with the Retail Price Index from 1 April 2012 to the levels set out in the table.

## Community-owned installations and aggregation

27. The phase 1 consultation gave a commitment to considering whether more could be done to enable genuine community projects to be able to fully benefit from FITs. Alongside this response document we have now published consultations on the second phase of the FITs comprehensive review. This includes proposals relevant to community schemes, such as a proposed definition of “community” and a complementary proposal for distinguishing between community aggregated projects, such as social housing, and commercial aggregated projects.

## Government decision on energy efficiency

### Consultation proposals

28. The consultation made clear the Government's intention to ensure that the installation of solar PV is considered as part of a holistic approach to carbon reductions in buildings that prioritises energy efficiency. It therefore proposed making eligibility for the standard solar PV tariffs dependent on a FIT generator demonstrating that the building to which their solar PV installation is attached or wired to provide electricity, meets a certain level of energy efficiency.
29. The consultation proposed two possible approaches to defining the energy efficiency requirement: either (1) bringing the building up to an Energy Performance Certificate (EPC) rating of level C or above; or (2) undertaking all the measures that are identified on an EPC as potentially eligible for Green Deal finance. The consultation sought views on applying these requirements in respect of new solar PV installations on both dwellings and non-domestic buildings. It also proposed, as a transitional measure, that installations with an eligibility date between 1 April 2012 and 31 March 2013 would have 12 months from their eligibility date to meet the requirement.

### Stakeholder feedback

30. 35% of respondents agreed with the overall principle that there should be a link within the FITs scheme to an energy efficiency requirement, while 43% disagreed that there should be any link at all. 22% of respondents did not respond to this question. In terms of the proposals for what the energy efficiency requirement should be, 19% of respondents agreed with option 1 (achieve a specified EPC rating) in respect of dwellings, and 22% in respect of non-domestic buildings. 27% of respondents agreed with option 2 (undertaking all the measures that are identified on an EPC as potentially eligible for Green Deal finance) in respect of dwellings, and 28% in respect of non-domestic buildings. Further detail of this analysis can be found in Part 2 of this document.
31. The key concerns raised related to the proposal to require EPC level C, which many considered was too stringent and would effectively preclude the majority of households from eligibility for FITs support above 9p/kWh. For those respondents who expressed concerns regarding the Green Deal measures option, the principal issue was that this proposal would come into effect before the Green Deal itself was established.
32. There was no pronounced difference between the issues raised in respect of dwellings and non-domestic buildings. Responses tended to focus on the high level points of principle rather than considering detailed implementation issues. There were, however, exceptions to this general trend. For example, the National Farmers' Union and others raised concerns about the application of the requirement to certain agricultural buildings.

## Way forward

33. The Government remains convinced of the case for making eligibility for the standard tariffs for solar PV conditional on a building meeting a specified minimum energy efficiency requirement. This is because reducing demand for energy is one of the most cost-effective ways of reducing carbon emissions and therefore a process that should be prioritised before installing microgeneration such as solar PV.
34. In the future, the Green Deal will be an important part of the Government's approach to delivering energy efficiency improvements to buildings around the country. We note the concerns raised about making an explicit link to the policy in advance of its introduction, and our final decision reflects those concerns. However, we will keep the approach to energy efficiency and the FITs scheme under review, bearing in mind the opportunities that the Green Deal will offer in future, including for an energy efficiency requirement based on cost-effective measures that are more bespoke to individual buildings.
35. In the meantime, we consider that a requirement based on an EPC rating would be appropriate. We have considered consultation feedback on this very carefully and recognise in particular the concerns that EPC level C would be a stringent requirement at this time. Therefore, we are intending to proceed with a requirement based on EPC level D that will apply in respect of both domestic and non-domestic buildings.
36. Currently, around 51% of all dwellings are rated at EPC level D or above, and 47% of all dwellings except flats (this compares to 13% of dwellings at EPC level C or above). The proportion is larger amongst local authority and housing association dwellings (72% and 77% respectively). There is less data available for non-domestic buildings, where EPC ratings vary greatly among different building types and usages. However, the data that is available based on the limited sample of existing non-domestic EPCs shows that 65% of non-domestic buildings with EPCs are currently at level D or above.
37. For buildings that do not already meet the required standard, reaching level D may require the installation of some, but not all, of the measures described in the consultation document. For example, measures could include loft insulation, cavity wall insulation, heating controls, hot water cylinder insulation, and installation of a replacement boiler, but not solid wall insulation. The total cost of meeting level D will vary depending on the base-level energy performance of the building in question, but is likely to be lower than the cost of meeting level C. Illustrative costs to reach level D are:
- £1280 for a detached house with cavity walls currently rated as F where loft insulation, cavity wall insulation, heating controls and hot water cylinder insulation would be needed;
  - £530 for a mid-terrace house currently rated as E that already has loft insulation, but where cavity wall insulation and hot water cylinder insulation are needed.

38. As set out in the consultation document, during the period April to December 2012, some financial support from the Carbon Emissions Reductions Target (CERT) scheme<sup>7</sup> may be available to cover a proportion of the installation cost for the more basic measures, with the householder paying the rest upfront. From autumn 2012, we expect that the measures would be largely financeable through the Green Deal.
39. Given the decision not to proceed with a requirement linked to the Green Deal in advance of the Green Deal being introduced, coupled with the fact that EPC level D is a less stringent requirement than the proposal for EPC level C, we consider that there is now less justification for the transitional period proposed in the consultation. Additionally, some respondents expressed concerns about the possible impacts of such a transitional arrangement, particularly its potential to cause uncertainty for consumers and create a new mis-selling risk. A number of FITs licensees also raised concerns about the practicability of implementing such an arrangement which would require additional post-accreditation checks and action. Therefore, **we have decided not to proceed with any transitional arrangement.**
40. The energy efficiency requirement will only apply to new solar PV installations, including extensions to existing solar PV installations, with an eligibility date on or after 1 April 2012. To meet the requirement, generators will need to demonstrate as part of their application for FITs that the building to which the solar PV installation is attached or wired to provide electricity is rated at EPC level D or above. To do this, they will need to provide a valid EPC certificate as part of their application for FITs which will then need to be verified as part of the FITs accreditation process.
41. Generators who cannot demonstrate that they meet the energy efficiency requirement will only be eligible for a lower tariff for the duration of the tariff lifetime. As set out in the consultation, from 1 April 2012 this will be 9p/kWh. We are consulting in the Phase 2A consultation document on a proposal that, for the future, the tariff available for those who do not meet the energy efficiency requirement should match the tariff for stand-alone solar PV installations. The Phase 2A consultation proposes that this like other solar PV tariffs will reduce on 1 July and thereafter according to the proposed depression mechanism.
42. Many respondents suggested possible exemptions from the energy efficiency requirement. Having considered responses carefully, we have decided that generators who can demonstrate that it is not possible to obtain an EPC certificate for the building to which their solar PV installation is attached or wired to provide electricity, will be exempt from the energy efficiency requirement.

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<sup>7</sup> *The Carbon Emissions Reduction Target (CERT) came into effect in April 2008, obliging electricity and gas suppliers in Great Britain to help reduce carbon dioxide emissions from homes. Suppliers meet their targets by promoting the uptake of measures that improve energy efficiency, for example by providing grants and offers to help households pay for loft and wall insulation.*

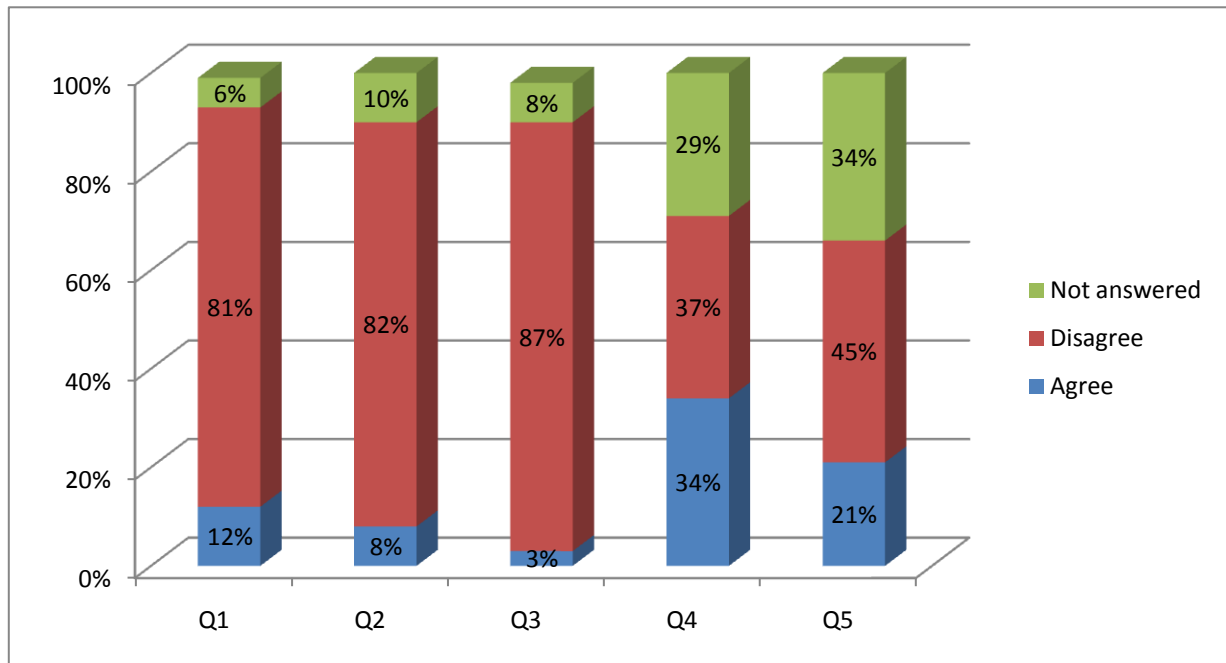
43. We expect that the instances in which this exemption will apply will be very limited. This is because it should be possible to obtain an EPC for any building that meets the definition of building set out in the Energy Performance of Buildings Directive (it is important to note that this includes buildings which are not currently required under that Directive to have an EPC when sold, let or built)<sup>8</sup>. Additionally, in many cases we expect that solar PV installations which are attached to a building for which it is not possible to obtain an EPC, will nonetheless be wired to provide electricity to a building that is able to obtain an EPC. For example, this might include a solar PV installation attached to a barn that is also wired to provide electricity to a farmhouse. In this example, the requirement would still apply and could be met if an EPC were provided demonstrating that the farmhouse was rated at EPC level D or above.
44. The Government intends to give effect to the new energy efficiency requirement by amending Condition 33 of the Standard Conditions of Electricity Supply Licences, subject to the parliamentary process set out in the Energy Act 2008. Our intention is that these amendments will be made by 1 April 2012, following completion of the 40 day period of laying before Parliament required by section 42 of the Energy Act, and will come into effect on 1 April 2012, applying to all installations with an eligibility date on or after that date.

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<sup>8</sup> Directive 2002/91/EC on the energy performance of buildings defines “building” as “a roofed construction having walls, for which energy is used to condition the indoor climate; a building may refer to the building as a whole or parts thereof that have been designed or altered to be used separately”.

## Part 2 | Detailed Analysis of Consultation Responses

### Questions on proposed tariff changes



#### Questions 1 to 3: Proposal to change the tariffs

Q1: Do you agree or disagree with the proposed new tariffs for solar PV? Give reasons to support your answer.

Q2: Do you agree or disagree with the proposal of applying the new tariffs to all new solar PV installations with an eligibility date that is on or after a reference date that comes before the legal implementation of those tariffs? Give reasons to support your answer.

Q3: Do you agree or disagree with the proposed reference date of 12 December 2011? Give reasons to support your answer.

45. A version of this text originally appeared in the Government response published on 19 January 2012; the earlier version focused on comments directly relating to the proposed tariffs in response to question 1. This version includes additional comments made by respondents to the related questions on the reference date proposals.

46. 81% of respondents disagreed with the proposed new tariffs for solar PV, compared to 12% who agreed. 87% disagreed with the proposed reference date of 12 December 2011, while only 3% agreed with it.

47. Responses showed that there was support in principle for reducing the tariff; indeed, most respondents agreed that the current level was too high and has led to commercial investors exploiting the tariff. However, there was widespread concern the Government would reduce the tariff by too much, too quickly.

For example, one local authority, while agreeing with the principle felt the proposals were disproportionate:

*'We agree the tariff should be set at such a rate that creates demand for renewable energy technologies so that they become established and with early knowledge of a phased reduction the market and price can reduce over time through competition and economies of scale. We accept that as the process develops FITS will need to be adjusted to ensure it represents VFM [value for money] from both energy companies' perspective as well as the individuals investing in renewable energy.'*

48. A number of respondents argued the reduction did not reflect the reduction in installation costs. Others argued that the Government had not taken into account the peripheral and maintenance costs involved. Several respondents questioned the level of reduced installation costs with a few arguing this was due to the influx of cheap (inferior) products.

For example, one supplier wrote:

*'The only major reductions in prices that have been experienced are the costs of PV panels. Ancillary products such as inverters and framing have remained relatively unchanged, as have installation costs. The Government appears to be of the opinion that the price of PV products will continue to fall indefinitely at this rate. What does not seem to be recognised at this stage is that the price cuts experienced thus far are in fact artificial and cannot be sustained.'*

49. While a minority view, there were other respondents who agreed with the proposed reduction in tariffs. For example, one respondent wrote:

*'Costs of fully installed systems have fallen from around £5,000/kW in 2009 to around £3,400/kW today – a fall of around 30%. Domestic customers have seen returns over 15%. We agree that returns at this level are unsustainable and unfair. We have modelled the proposed tariff levels against the current delivered prices that customers are paying today and agree that for installations below 4KW [sic], the tariffs deliver the stated returns of about 4.5%.'*

50. A number argued the reductions are not in line with other technologies, such as wind power. Some respondents argued the rates have been fixed using the most generous calculations (i.e. properties in south with south-facing panels).

51. Many respondents disagreed with the rate of return the proposed tariffs are intended to provide, quoting the Energy Saving Trust figures which suggest a payback of 20 years, they argued that the return on investment would be unattractive. However, a few



respondents said the revised rate will remain economic and attractive for investors and businesses in particular, though they were concerned that householders will withdraw from the market. Some argued the payback should be pegged to 10 years, with the rate tapering off after, while others argue the tariff should not be paid after the installation costs have been paid off.

52. Many respondents (particularly in the charity sector) believed there should be a preferential higher rate for charities and social projects where the finances raised could be used either to pay for further energy efficiency measures or continuing and extending community projects. Some respondents felt there should be a distinction between householders with small systems and commercial organisations with large systems (e.g. over 3.8 – 4 kW).
53. Many respondents also believed the changes were being introduced too quickly and argued this would lead to business closures, job losses, rushed orders to meet the 12 December deadline, and a drop in new orders after 12 December. A number argued this was exacerbated by the timing, i.e. winter months, which might lead to errors and accidents. Others argued that the proposals had led to a stock shortage, putting extra strain on companies fulfilling existing orders before the deadline.
54. Local authorities, charities and other public bodies felt the processes they had to go through to secure agreement and funding and procurement processes meant the revised timescales were particularly harsh. Some argued the Government should not reduce any tariffs until April 2012. Others accepted the tariffs needed to be reduced more quickly, but argued either that the rate should be tapered gradually or those who had ordered and paid a deposit on an installation should qualify for the higher rate.
55. Some respondents did not think the distinction between orders and installations was helpful because technical appraisal and installations are uncertain and may take a long time). Many believed a reference date before the end of the consultation period was wrong. There was some support for an annual, independent review of tariffs.

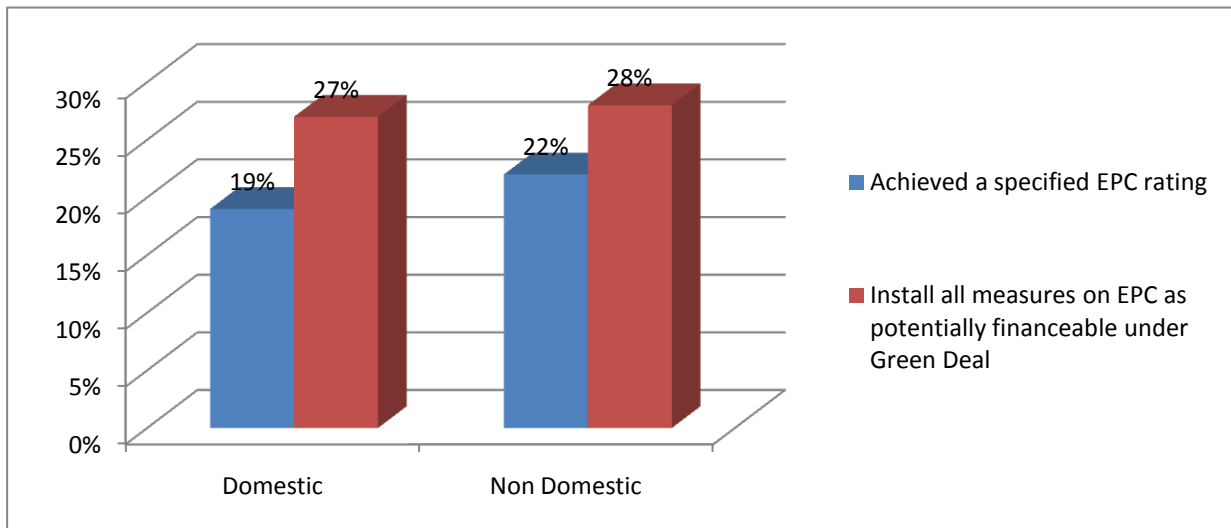
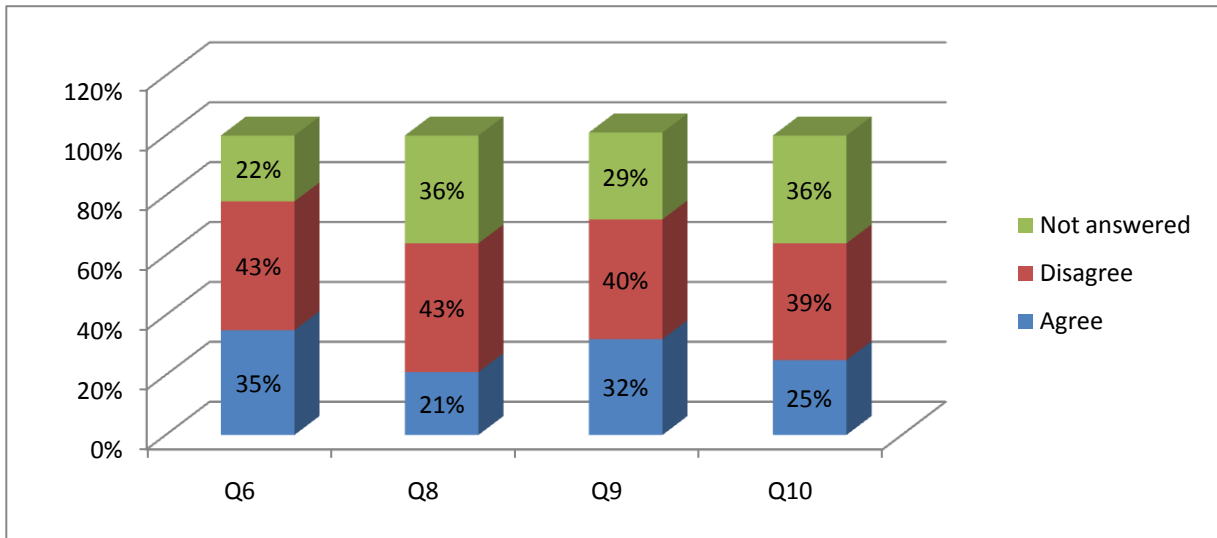
## Questions 4 and 5: Proposal to introduce new multi-installation tariff rates

Q4: Do you agree or disagree with the proposal to introduce new multi-installation tariff rates for all new solar PV installations that meet the definition set out above and have an eligibility date of on or after 1 April 2012? Give reasons to support your answer.

Q5: Do you agree or disagree with the proposed multi-installation tariff rates? Give reasons to support your answer.

56. 34% of respondents agreed with the proposal to introduce multi-installation tariff rates. However, 37% disagreed with the proposal. 29% did not answer this question. 21% agreed with the proposed multi-installation tariff rates, but 45% disagreed. 34% did not answer this question.
57. There was a significant view that investors had exploited the current scheme and that 'rent a roof' projects should be curtailed or the tariff focused on householders rather than investors. However, many charities and social housing providers believed the proposals would lead to investors abandoning the market, which would mean they would not be able to raise the revenue to pay for installations.
58. There was a mixed response to the question relating explicitly to the proposed rates for multiple installations, with some agreeing the rates were acceptable (often with the proviso that community projects should be exempt) but others believing the reduction was too sharp. Several respondents argued the rate should be a minimum of 8% below the standard tariff, while others preferred a model based on a rate which falls after 18 months. Several respondents commented that the proposal was too complex and the system should be kept simple.

## Questions 6 to 10: Energy efficiency requirement



### Question 6: Proposal to introduce an energy efficiency requirement.

Q6. Do you agree or disagree with the proposal that for solar PV attached to a building, eligibility for the standard tariffs proposed in chapter 2 should be contingent on a minimum energy efficiency requirement being met? Do you have views on whether such a requirement should apply in relation to all buildings or just to dwellings or non-domestic buildings? Give reasons to support your answer.

59. 35% of respondents agreed with the overall principle that there should be a link within the FITs scheme to an energy efficiency requirement, while 43% disagreed that there should be any link at all.

60. Many respondents agreed that energy efficiency measures were important, and several mentioned the need for a hierarchy of measures with solar being installed only after at least basic energy efficiency measures were carried out. Some argued that making this a requirement was unacceptable because it would mean potential customers had to agree to potentially intrusive, time consuming and costly measures in addition to paying for solar PV.

61. One private company for example said:

*'The homeowner should be allowed to choose what work they want done on their house, they may have valid reasons why they don't want some work doing. If we are too stringent on requirements, there is a risk that homeowners will simply do nothing, we need flexibility and a good rate of return to get people to do anything about reducing energy consumption.'*

62. A significant number argued that there was no link between solar PV and energy efficiency, that linking the two could impede growth in solar installations, and consequently the two should be kept separate. Respondents felt that to apply this condition to solar PV exclusively would be unfair, would distort the market and would put solar PV at a competitive disadvantage.

63. Others argued that installing solar can engage consumers in sustainable energy use, though no hard evidence was put forward to support this.

64. For example, one trade association said:

*'Electricity generation is distinct from heat generation as the installation of a solar PV system in a property that does not have a high level of energy efficiency is unlikely to waste energy in a way that installing a heating system would. Any excess electricity generated is exported to the grid. In fact evidence is emerging that installing solar PV leads inhabitants to reduce their energy use. Therefore other than a method to constrain demand it is difficult to understand why such a link is logical.'*

65. Local authorities and social housing providers in particular argued that installing solar PV enabled them to generate funding for future energy efficiency measures. A small number of respondents argued that behaviour change was equally if not more important than the fabric of the property and that renewable energy can help to raise awareness of energy issues among the public and in communities. Several respondents argued there should be incentives linked to 'good' behaviour or to facilitate the adoption of energy efficiency measures. Several respondents raised concerns that the proposals could adversely impact households in fuel poverty.

66. One academic said:

*‘There is already evidence that solar PV is regressive in terms of wealth redistribution. Research, by this author, shows that PV installations are far less likely to be installed in areas...of high index of multiple deprivation...It is also likely that such areas have poorer housing with commensurate poor energy performance. This proposal is likely to exacerbate the slower rate of PV adoption in less affluent areas.’*

## Questions 7 to 8: Proposed options for setting the energy efficiency requirement

Q7. Which of our two lead options for the energy efficiency requirement – requiring a building to achieve a specified EPC rating, or requiring the installation of all measures that are identified on an EPC as potentially financeable under the Green Deal - do you prefer for (1) dwellings, and (2) non-domestic buildings? Give reasons to support your answer.

Q8: Under the first option for the energy efficiency requirement, do you agree or disagree with the proposal that the EPC rating required to be achieved should be level C or above? Give reasons to support your answer.

67. In terms of the proposals for what the energy efficiency requirement should be, 19% of respondents agreed with option 1 (achieve a specified EPC rating) in respect of dwellings, and 22% in respect of non-domestic buildings. 27% of respondents agreed with option 2 (undertaking all the measures that are identified on an EPC as potentially eligible for Green Deal finance) in respect of dwellings, and 28% in respect of non-domestic buildings.

68. Under the option to require a building to achieve a specific EPC rating, 22% agreed with the proposal that dwellings should achieve level C or above, rising to 24% for non-domestic properties. However, 43% disagreed with the proposal. 36% did not respond to the question.

69. Those who preferred a specified EPC rating said that it was comprehensible and flexible (i.e. setting a level to reach rather than how to get there) though others argued that it was a blunt instrument which only showed the standard achieved at a particular point in time; there is a need for ongoing, granular data that proves green measures are working. Some argued that it was more applicable to non-domestic properties, though not all (e.g. farm buildings and storage facilities which are unheated). Some questioned the level of professional expertise of some EPC assessors; one or two claimed they had proposed measures which were inappropriate or unfeasible. A number of respondents emphasised the need for independent, impartial energy advice to ensure consumer protection.

70. There were no specific arguments put forward for the requirement to install all measures financeable under the Green Deal. Those who were opposed to this proposal cited a) a lack of clarity around the criteria for the Green Deal in general and funding in particular, and b) that it would be costly, intrusive and time-consuming. Many argued that the Green Deal should be established before any link to FITs and energy efficiency is made.
71. Some argued for alternatives. There was no consensus around which alternative would be preferred, though most respondents said the requirement should be simple, inclusive, and achievable.
72. The following were common suggestions:
- (a) the rating should be lower (e.g. EPC level D);
  - (b) the rating should be relative (i.e. that the building should be improved by two grades above its current level, should be dependent on building type and simplified Display Energy Certificate);
  - (c) the requirement should be for basic measures (such as minimum standard of loft insulation, cavity wall insulation where appropriate, and other basic energy efficiency measures) or some general sense of 'improvements' made. A significant number argued for a light touch approach, with quick, simple inspections and online processes;
  - (d) proof of low energy use
73. Those who agreed with the proposal for EPC level C said that achieving level C was realistic for most properties. Some argued for higher levels or for challenging people to reach higher levels over a period of time. A number emphasised the importance of making properties as energy efficient as possible before installing solar PV.
74. Many however disagreed with the proposal for level C, saying it was unrealistic for many hard-to-treat properties (including listed buildings) to reach level C and they would therefore be excluded from the benefits of the scheme. A number argued that for these properties installing solar is often one of the things they can do which would have a positive environmental impact. Some argued this requirement should only relate to new-builds and that this should be in the Building Regulations.
75. A number of respondents argued that schools were different to dwellings and non-domestic buildings. They argued that most schools usually have low energy efficiency levels (and would not achieve level C). They explained that schools were well placed to send a positive signal to the wider community and children about the benefits of solar power and sustainable energy use and this would be lost if the proposals were implemented as set out in the consultation.

## Questions 9 and 10: Proposed transitional arrangement for energy efficiency requirement

Q9. Do you agree or disagree with the proposal that, for a transitional period only, all solar PV installations attached to a building should initially qualify for the standard tariff, and their continued eligibility for that tariff should be conditional on the building to which the PV installation is attached achieving the energy efficiency requirement within a specified period? Give reasons to support your answer.

Q10. Do you agree or disagree that this transitional arrangement should apply to installations with an eligibility date on or before 31 March 2013, and that the specified period should be 12 months from the installation's eligibility date? Give reasons to support your answer.

76. 32% of respondents agreed with the proposal that all solar PV installations should qualify for a standard tariff for a transitional period only and that continued eligibility should be dependent on meeting an energy efficiency requirement. However, 40% disagreed with this proposal. 29% did not answer. 25% agreed with the proposal that installations on or before 31 March 2013 would have to reach the agreed energy efficiency requirement within 12 months of installation, but 39% disagreed. 36% did not answer.

77. Some respondents thought that if eligibility for FITs was contingent on meeting an energy efficiency standard, then a transitional period was helpful. Some argued it was necessary to give people a timeframe to ensure the works were actually carried out. Some suggested that the requirements were 'reasonable' and 'practical', and others agreed as long as support was given to meet the energy efficiency requirement. However, others said it was too complicated and difficult to monitor, would become bureaucratic and costly, while others were concerned that investors would not invest without the certainty the measures would be undertaken. There were also those who raised concerns about the risks to consumers arising from this uncertainty. For example, one investment finance organisation argued:

*'While the transitional period allows flexibility for the energy efficiency measures to be undertaken during a set period after PV installation, there is no guarantee these energy efficiency measures will be undertaken and the higher FIT [sic] retained. No third party investor will invest in PVs without certainty that these energy efficiency measures will be undertaken and thus they will have to be done at the same time [as] the PV installation, since 9p/kWh is financially unviable.'*

78. Many argued for a longer period – e.g. up to two years, and there was significant support for this to be after the Green Deal was up and running and well-established. Many argued this requirement should not be applied retrospectively.

## Question 11: Other issues relating to the implementation of an energy efficiency requirement

Q11. Can you identify any other issues, besides those discussed in this chapter, in relation to the implementation of an energy efficiency requirement for (1) dwellings, and (2) non-domestic buildings?

79. A significant number of respondents highlighted the need to set solar power within the wider context of sustainable energy use and consumption. These respondents sometimes suggested the proposals were piecemeal or sketchy. A small number suggested the FITs review should be tied in with clarification about the Renewable Heat Incentive and Green Deal funding eligibility while others asked whether there were tie-ins with other renewable energy initiatives.
80. A significant number of respondents highlighted the need for education about the cost benefits of solar and sustainable energy use. Several contended that installation of solar panels can engage consumers in sustainable energy use, though no evidence was put forward to support this.
81. A few respondents argued that air heat recovery was low cost and energy efficient and should be a requirement, while others argued that the definition of energy efficiency for (unheated) agricultural buildings should be looked at properly.
82. One respondent argued that energy efficiency depended on the nature of a business and that eligibility should be based on meeting carbon reduction targets as well as a building's energy efficiency. Another respondent argued that insulation subsidies should be prioritised. Another argued that thermal imaging should be used to calculate U values and to ensure that future energy efficiencies were genuine.
83. One respondent argued that there may be a health risk associated with installing solar panels (from electromagnetic fields) which might adversely affect security and mortgage loan conditions.



## Annex A | Question List

Q1: Do you agree or disagree with the proposed new tariffs for solar PV? Give reasons to support your answer.

Q2: Do you agree or disagree with the proposal of applying the new tariffs to all new solar PV installations with an eligibility date that is on or after a reference date that comes before the legal implementation of those tariffs? Give reasons to support your answer.

Q3: Do you agree or disagree with the proposed reference date of 12 December 2011? Give reasons to support your answer.

Q4: Do you agree or disagree with the proposal to introduce new multi-installation tariff rates for all new solar PV installations that meet the definition set out above and have an eligibility date of on or after 1 April 2012? Give reasons to support your answer.

Q5: Do you agree or disagree with the proposed multi-installation tariff rates? Give reasons to support your answer.

Q6. Do you agree or disagree with the proposal that for solar PV attached to a building, eligibility for the standard tariffs proposed in chapter 2 should be contingent on a minimum energy efficiency requirement being met? Do you have views on whether such a requirement should apply in relation to all buildings or just to dwellings or non-domestic buildings? Give reasons to support your answer.

Q7. Which of our two lead options for the energy efficiency requirement – requiring a building to achieve a specified EPC rating, or requiring the installation of all measures that are identified on an EPC as potentially financeable under the Green Deal - do you prefer for (1) dwellings, and (2) non-domestic buildings? Give reasons to support your answer.

Q8: Under the first option for the energy efficiency requirement, do you agree or disagree with the proposal that the EPC rating required to be achieved should be level C or above? Give reasons to support your answer.

Q9. Do you agree or disagree with the proposal that, for a transitional period only, all solar PV installations attached to a building should initially qualify for the standard tariff, and their continued eligibility for that tariff should be conditional on the building to which the PV installation is attached achieving the energy efficiency requirement within a specified period? Give reasons to support your answer.

Q10. Do you agree or disagree that this transitional arrangement should apply to installations with an eligibility date on or before 31 March 2013, and that the specified period should be 12 months from the installation's eligibility date? Give reasons to support your answer.

Q11. Can you identify any other issues, besides those discussed in this chapter, in relation to the implementation of an energy efficiency requirement for (1) dwellings, and (2) non-domestic buildings?

## Annex B | List of Respondents to the Consultation

The following table lists all non confidential companies and organisations which have responded to the consultation. A copy of all the non confidential response, including those made by individuals which are not included in this table, has been made available on the DECC FITs website – [www.decc.gov.uk/fits](http://www.decc.gov.uk/fits)

1	10:10
2	0800SPARKS.COM LTD
3	1 World Solar Ltd
4	350 Strategy Ltd
5	A Greener Hawick
6	A M Borrill & Son
7	A Shade Greener Ltd,
8	A&R Heating & plumbing Ltd
9	AARDVARK PHE
10	Abbott & Booth Ethical Financial Planning
11	Aberystwyth University
12	Absolute Energy Limited
13	Absolute Insulation Ltd
14	Access Renewables
15	ACELECTRICALS UK LTD
16	ACS Renewable Solutions Ltd
17	Action for a Better Charnwood
18	Action with Communities in Rural England (ACRE)
19	Active Sustainable Energy Systems
20	Active Sustainable Energy Systems
21	ADEPT Association of Directors of environment, economy, planning and transport
22	Advantage SW
23	AEE Renewables
24	Aerpro Ltd
25	AES Ltd
26	Agelec Ltd
27	AHDB - BPEX
28	AKD

29	Alexander Assessments
30	All electrical solutions
31	All-Party Parliamentary Group for the Roofing Industry
32	Allpump Services/Renewables
33	Altereco Alternative Energy Solutions Ltd
34	Alternative Energy Solutions Ltd
35	Alternergy
36	Alva Northern Ltd
37	Amber Electrics
38	Amber Electrics
39	Ampere Solar
40	Anglian Windows Limited
41	Apollo Solar Installations Ltd
42	ARC ELECTRICAL ( LINCOLN ) LTD
43	ARC SW Ltd
44	ARC Taunton Ltd
45	Arden Electrical (Midlands) Ltd
46	Ardenham Energy Ltd
47	Arun District Council
48	Ascertiva Group Ltd
49	Ashford Borough Council
50	ASPIRATION SOLAR
51	Aspire Housing
52	Association of Electricity Producers
53	Aster
54	Astley Electrical Systems
55	Avalon Sciences Ltd
56	Avanti Solar Limited
57	AVC Group
58	Axter Ltd
59	Aylesbury Vale DC

60	B.E.Edwards MCIBSE
61	BAE Systems
62	Baildon Friends of the Earth
63	BALSALL HEATH IS OUR PLANET
64	Barres Co Ltd
65	Bates Wells & Braithwaite London LLP
66	Bath &; North East Somerset Council
67	Bath and West Community Energy Ltd
68	Bawden Consulting Ltd
69	Beco Solar Ltd
70	Bedford Borough Council
71	Bedminster Energy Group
72	Bee Solar Power
73	Beechdale Energy
74	Beechdale Energy Ltd
75	Begetube UK Ltd
76	Bellinus Limited
77	Berneslai Homes
78	Bexhill Solar
79	BG Renewables Micro-generation Consultants
80	Bierce Technical Services Limited
81	Birmingham City Council
82	Blackburn with Darwen Borough Council
83	Blewbury Energy Initiative
84	Bob Maltz, Architect
85	Bollington Carbon Revolution
86	Border Eco Design (Energy Services)
87	Borough Council of Wellingborough
88	Borough of Poole
89	Bournemouth Borough Council
90	BPHA (Bedfordshire Pilgrims Housing Association)
91	Brendon Energy
92	Brendon Energy
93	Bright Green Energy Ltd

94	Brighton & Hove City Council
95	Brighton Energy Co-op
96	Bristol City Council
97	Bristol Energy Co-operative
98	British Citizen
99	British Gas
100	British Institute of Facilities Management
101	British Photovoltaic Association
102	British Property Federation
103	British Retail Consortium
104	British Sikh Women Organisation
105	British Waterways
106	Brixton Energy
107	Bromsgrove Partnership/ Bromsgrove District Council
108	Broxtowe Borough Partnership
109	Bryn Awelon Farm
110	Buckinghamshire County Council
111	Builders Merchants Federation (BMF)
112	Building Arts Community Interest Company
113	Burnetts
114	Business in Focus Limited
115	Butler & Young Ltd
116	C Changes Ltd
117	Cambridgeshire Police Authority
118	Campaign to Protect Rural England
119	Canton Carbon Cutters
120	Canton Carbon Cutters
121	Canton Carbon Cutters
122	Caplor Energy
123	Carbon3IT Ltd
124	Carillion Energy Services
125	Catch-22 Solutions Limited
126	Central Association of Agricultural Valuers
127	Centre in the Park
128	Changeworks
129	Channel Design Ltd
130	Chapelton Baths

131	Chartered Institute of Housing
132	Chartered Institution of Water and Environmental Management (CIWEM)
133	Chelmsford Borough Council
134	Cheltenham Borough Council
135	Cheriton Bishop Village Hall
136	Cheshire County FA
137	Cheshire Fire and Rescue Service
138	Cheshire Oaks Fisheries
139	Chesterfield Borough Council
140	Chew Valley School
141	Chipping & District Memorial Hall
142	Christ Church Summerfield
143	Christopher Haynes-Brown
144	Christopher Meeks
145	Church of England Diocese of London
146	Church of Scotland
147	Churchwarden of St. Peter's, Frampton
148	Circle Housing Group
149	City of York Council
150	City South Manchester Housing Trust
151	CityWest Homes
152	CJS Elcetrical @ CJS Eco Energy
153	Clean-ex Electrical Ltd
154	Clifford Electrics
155	Climate Friendly Bradford on Avon Community Interest Company
156	Colchester Borough Council
157	Colenso PV LLP
158	Community Action Hampshire
159	Community Energy Plus
160	Community Energy Warwickshire
161	COMMUNITY ENERGY WARWICKSHIRE LIMITED
162	Community Futures
163	Community Housing Cymru
164	Community Power Cornwall
165	Complete Picture UK Ltd

166	Complete Solar Ltd
167	Complete Solar Solutions Ltd
168	Congleton Sustainability Group
169	Construction Licensing Executive
170	Construction Products Association
171	Consumer Focus
172	Contemporary Energy Ltd
173	Convention of Scottish Local Authorities (COSLA)
174	Conwy County Borough Council
175	Corby Borough Council
176	Core Cities Group
177	Core Cities Group
178	Cornwall Council
179	Cornwall Power
180	Corona Lighting Ltd
181	Country Land & Business Association
182	Creative Technology Ltd
183	CREST (Centre for Renewable Energy Systems Technology)
184	Crimewatch Alarms LTD
185	Croston Renewable Energy Ltd
186	Croydon Council
187	Crystal Windows
188	Cuddington Parish Council
189	Cummins Generator Technologies
190	Cutter Solar Ltd
191	D & L ELECTRICAL
192	D. F.& H. J. Swinglehurst
193	Dacorum Borough Council
194	Dale and Valley Homes.
195	Dartmouth Park Conservation Area Advisory Committee
196	Dave Green Energy Services
197	David Burgess
198	David Coulson Construction
199	Dawsetway Heating and Renewables Limited
200	DECC Youth Advisory Panel
201	DEK
202	DEK International

203	Derby City Council
204	Derby City Council Lib Dem Group
205	Deviock Community
206	Devon County Council
207	Diocese of Chelmsford
208	Diocese of Gloucester (in Conjunction with Sustain Ltd)
209	Diocese of Truro
210	Diptford Parish Hall Trust
211	Discovery Solar
212	District Councillor, Bradford Metropolitan District Council
213	DJS Electrical
214	DOBSON:OWEN
215	Dorset County Council
216	Dorset Solar Power Ltd
217	Downing College
218	Drew and Co Ltd
219	Dulas Ltd
220	Dulas MHH Ltd
221	Dumfries and Galloway Council
222	Dunbar Community Energy Company
223	Durham County Council
224	Durham Rural Community Council
225	DWA Solar
226	Dwr Cymru Welsh Water
227	Dynamic Solar
228	Dyspraxia UK
229	E3 Foundation
230	East Coker Village Hall
231	East Durham Homes
232	East Lindsey District Council
233	East Newtown Farm
234	East Yorkshire Solar LTD
235	Easthall Park Housing Co- operative Ltd
236	Eastleigh Borough Council
237	Eco Centre Wales
238	Eco Environments Ltd
239	Eco Solar UK Ltd
240	Eco Sun Systems

241	Eco2 Solar Ltd
242	Ecoce
243	Ecocymru
244	EcoDIY
245	Ecodomus Ltd
246	EcoEco
247	Eco-economix.com
248	Ecoliving Cheshire & Staffordshire
249	Ecoskies Ltd
250	Ecoup Ltd
251	Ecovironment
252	Ecovision
253	Ecovision Systems Ltd
254	EDDIE ROBERTS
255	Edisun Ltd
256	Edmundson Electrical Ltd
257	Efficiency East Midlands
258	Efficiency North
259	EHS Solar Ltd.
260	Ekland Solar
261	Electra-mek Ltd
262	Electro Thermal Systems Limited
263	Emotion Energy Ltd
264	Empower Community Management LLP
265	Enact Energy Renewables Limited
266	Energi Installations PLC
267	Energicert
268	Energy and Infrastructure Group
269	Energy Friend
270	Energy4All
271	EnergyMyWay
272	Enertas Ltd.
273	Enfinity UK Limited.
274	Engenius Limited
275	Engensa
276	English National Park Authorities Association (ENPAA)
277	Envirogood Ltd
278	Envirolink Solar PV Special Interest Group

279	Environmental Association for Universities and Colleges
280	Environomic
281	ESTA (Energy Services and Technology Association)
282	Ethical Solar
283	Eversley Sports Association
284	EvoEnergy Ltd
285	Excess Solar Ltd
286	Exeter City Council
287	Exeter City Council
288	Exeter Municipal Charities
289	Explore Solar
290	Eyton Solar Partnership
291	F K Ltd
292	F&K Electrical & Refrigeration Ltd
293	Fairview New Homes
294	Farm Renewable Energy Options
295	Farm Renewables Ltd
296	Federation of Small Businesses
297	Feed-In Tariffs Limited
298	Fife Council
299	First Utility
300	Fisher and Donaldson
301	FIT FOR PROFIT
302	Fords
303	Forest heath District Council
304	Forum for the Future
305	FOX INC
306	Freesource Energy Ltd
307	Freetricity plc
308	Friends of the Earth
309	Future Power Systems Ltd
310	G AND S LTD
311	G Horn and Sons
312	G&S Ltd
313	Garry Lupton Associates
314	Garsington Energy (Green Energy UK)
315	Gary Roberts
316	Gateshead Council
317	Genersys plc

318	Gen-X Ltd
319	Geo Green Power Ltd
320	Gibson Specialist Technical Services Limited
321	Gigha Renewable Energy Limited
322	Gilbert Electrical Ltd
323	Girton College
324	Gladstone Wiz Ltd
325	Glasgow Housing Association
326	Gloucestershire County Council
327	Go Green Electrics Ltd
328	Good Energy
329	Good Neighbour Community Energy Ltd
330	GORSEHILL ABBEY FARM
331	Gough & Kelly Ltd
332	Governor at St Mary's C of E Primary School, Banbury
333	GP Electric
334	Grafton Group PLC
335	Grant Williams & Associate
336	Greater Manchester Chamber of Commerce
337	Greater Manchester Low Carbon Economic Area for the Built Environment
338	Green & Co Renewables Ltd
339	Green Building Press
340	Green Directions
341	Green Energy Projects Ltd
342	Green Exchange Network LTD
343	Green Giant renewables
344	Green Light Energy Solutions
345	Green Man Environmental Services Ltd
346	Green Park Power
347	Green Solar Solutions Ltd
348	Greenearth Energy Ltd
349	Greenenviro energy systems
350	Greenenviro Energy Systems Ltd
351	GreenHomeDiary
352	Greenpeace UK

353	Greensphere Renewable Energy
354	Greentomatoenergy
355	Greenwood Solar Ltd
356	Greenwood Structures
357	Groundwork Lincolnshire
358	GSE Solar Systems
359	Gwent Energy CIC
360	H2ecO Ltd
361	Halton Borough Council
362	Hambleton & Richmondshire District Councils
363	Hambleton Village Hall
364	Hampshire County Council:
365	Handcrafted Homes Ltd
366	Harboro Rubber Co Ltd
367	Harlow Council
368	Harris Creative Ltd
369	Hartlepool Borough Council
370	Hastoe Housing Association
371	Haven Architecture
372	Haven Power Ltd
373	Havenkaye Solar Energy
374	Heart of Eden Development Trust
375	Heatex Group
376	Heating & Proces Engineering Services Ltd
377	Heating and Ventilating Contractors' Association
378	Heatshine Ltd
379	Heddwch
380	Hedingham Liberal Democrats
381	Herefordshire Friends of the Earth
382	Hestia
383	High Cogges Farm
384	High Street Baptist Church, Tring
385	Highfield PCC
386	Highgate Climate Action Network
387	Highlands and Islands Enterprise
388	Hill Close Gardens Trust
389	Hillside Electrical Southern Ltd
390	Hillside Scout Group
391	Hilson Moran

392	Holdcroft sfw
393	Holden & Partners
394	Hollidays Farm
395	Homes for Scotland
396	Homesolar.co
397	HomeSun Holdings Limited
398	Homezone Community Interest Company
399	Housing Association
400	Hoyle Cottages
401	Hyde Park Electrical Ltd
402	Ian Dean Surveys & Site Services Ltd
403	ICAEW
404	IGC Power Limited
405	Imperial College Centre for Energy Policy and Technology (ICEPT)
406	INAVATA
407	Independent Energy Systems Ltd.
408	Industry Companies in Kilmarnock and Loudoun Constituency
409	Inside-Centre Ltd - T/A ICL Solar Electrical Services
410	Institution of Civil Engineers (ice)
411	Intelligent PV (ipv) Limited
412	Interlink RCT
413	Interserve Developments
414	iPower
415	Irradiance
416	Isle of Wight Friends of the Earth
417	Islington Council
418	J & J Lovie Ltd.
419	J and H Builders
420	J Nash
421	J S Security & Electrical
422	J.L.Herring & Son
423	James Pratt Electrical
424	Jamie Wrench
425	Jeff Ridley
426	Jesus Fellowship Community Trust
427	JEWSON ITD
428	John Marchant Electrical

429	Joint response - Bromsgrove District Council and Redditch Borough Council
430	Joju Ltd
431	JTec Energy Performance
432	Julian Owen Associates Architects
433	JUST ENERGY SOLUTIONS
434	Just Power for Communities CIC
435	JV Electronics
436	K R Electrical / Products Ltd
437	K. M. Electrical Solutions
438	Keep Britain Tidy
439	Kingsley Eco Solutions LTD
440	Kingsmead School
441	Kingspan Limited.
442	Kirklees Council
443	Kirklees Neighbourhood Housing
444	Knauf Insulation
445	Kraus & Naimer Limited
446	Krush Electricals
447	KTEC & Electrical Ltd t/a HomeSolar.co
448	L.S.Karpinski Partnership
449	LADYWOOD FURNITURE PROJECT
450	Lancaster Green Spaces
451	Land and Property Consultants
452	Land Securities
453	Leasingham Village Hall Committee
454	Ledbury Amateur Dramatic Society
455	Lee Costello PV Solar
456	Leeds City Council
457	Leeds Solar
458	LeenTech Ltd
459	Leicestershire County Hall
460	Liberal Democrat AM National Assembly
461	Light Foot Enterprises CIC
462	Lighthouse Electrical Services (Direct) Ltd
463	Lighting Efficiency Services Ltd

464	Lincoln Green Energy Ltd
465	LINCS ELECTRICAL SERVICES LIMITED
466	Lindridge Primary School
467	Liverpool Chamber Of Commerce
468	Liverpool Hope University
469	Liverpool John Moores University
470	Livin
471	Living Water Ecosystems Ltd
472	Llananant Farm & Gwent Energy Trust
473	LMK Thermosafe Ltd
474	Local Government Association
475	Local Government Yorkshire and Humber
476	London Assembly
477	London Borough of Camden
478	London Borough of Ealing
479	London Borough of Hackney
480	London Borough of Haringey
481	London Borough of Havering
482	London Councils
483	London Rebuilding Society
484	London's Green Party Member of the European Parliament
485	Longcliffe Quarries Limited
486	Longhurst Housing Group
487	Longmead Community Farm
488	Loundsley Green Community Trust
489	Lovell Partnerships Limited
490	Lovell Respond
491	Low Carbon Chilterns Co-operative Ltd
492	Low Carbon East Oxford
493	Low Carbon Expert Limited
494	Low Carbon Gordano
495	Low Carbon Hub
496	Low Carbon Ladock
497	LOW CARBON LADOCK PROJECT (Cornwall)
498	Low Carbon Oxford North (LCON) and Oxford North Community



	Renewables (ONCORE)
499	Luxco Energy
500	Lyndendown Ltd
501	M&S Contracts Ltd
502	MA Frost Electrical Services Ltd
503	Mace Group
504	MACK Construction
505	Maden Design & Build Ltd
506	Mainline Energy Solutions
507	Malkin Electrical (Vis-Solis)
508	Manchester City Council (on behalf the Association of Greater Manchester Authorities and key GM Housing Providers)
509	Manor Farm
510	MAP Environmental Ltd
511	Mark and Hazel Hepner
512	Markwell Green Energy
513	Marlborough House School
514	M-ART Consultants Ltd T/A Prolite Energy Systems
515	Martin Barker Electrical Ltd
516	Max Fordham LLP
517	MDB New Energy Ltd
518	Mears Group PLC
519	Melton electrical services ltd
520	MERLIN FREESOURCE LTD.
521	Metgen Ltd
522	Methodist Church
523	Micropower Council
524	Midori Solar & Electrical Solutions Ltd
525	Midsummer Energy
526	Mike Buckhurst
527	Mike Whalen consultancy services
528	Millstone Electrical Services Ltd
529	Minster Church of St Andrew, Plymouth
530	Mitchells Chartered Accountants
531	MLC solar ltd
532	Moat Homes

533	Monier Redland Ltd
534	Morecambe Bay Community Renewables
535	Morgan Lighting of Chorley
536	Mr Electric
537	Mr Electric (High Wycombe)
538	Mull Invest Ltd
539	Myriad CEG
540	Nailsea Methodist Church
541	Narec Capital
542	National Farmers' Union of England and Wales (NFU)
543	National Federation of Roofing Contractors
544	National Housing Federation
545	National Renewable Energy Centre (Narec)
546	National Trust
547	Natural Generation Ltd
548	Naturalwatt Ltd
549	Navitas solar
550	Navitron Ltd
551	NBG Digital home
552	Neil Hollow
553	New Energy Futures Ltd
554	Newcastle City Council
555	Newcastle City Council, Warm Zone CIC and NaREC.
556	NHS / transition town Weymouth and Portland
557	NHS Sustainable Development Unit
558	North East Chamber of Commerce
559	North Energy Associates Ltd
560	North Energy Systems
561	North Somerset Council
562	North Tyneside Council
563	North Tyneside Hospital
564	North Yorkshire County Council
565	Northamptonshire County Council
566	Northants Warm Homes
567	Northumbria University

568	Northwards Housing
569	Npower
570	NUS Consulting Group Ltd
571	NWS
572	Old and Abbey Church
573	Oldham Council
574	O'LearyGoss Architects
575	Ombudsman Services
576	One Heating t/a One Solar
577	onix systems ltd
578	Optima Community Association
579	Optima plumbing
580	Origin Energy CIC
581	Orkney Islands Council
582	ORSIS (UK) Ltd
583	Orta Solar Ltd
584	Orton & Wenlock Dev Ltd
585	OVESCO Limited
586	Oxford Civic Society
587	Oxfordshire County Council
588	P J Contracting Services Limited
589	Parus Solar
590	Passivhaus Homes Ltd
591	Pathfinder
592	PAUL O'BRIEN SOLAR INSTALLATIONS
593	PCLIP
594	Peabody
595	Peak Power Systems Ltd
596	Pembrokeshire South East Energy Group
597	Pend House
598	Perranporth Methodist Church & Perranporth Memorial Hall
599	Peterborough City Council
600	Photon Energy Ltd
601	Pickard Electricals Ltd / Natural Energy Installations
602	Planet 3 LTD
603	Planet Solar Ltd
604	Plan-it Earth Environmental Education Project C.I.C.

605	Plug into the Sun
606	Poole Agenda 21 Acting Chair.
607	Positive Solutions (Glasgow)
608	Powersun Ltd
609	P-P Services GB Ltd
610	PPL TRAINING LIMITED
611	Prescient Power Ltd
612	Pretty Green Energy
613	Primavera Energy
614	Pro Fit Solar Ltd
615	Pro Solar Power Ltd
616	Procure Plus
617	PROinspect Consultancy
618	Project Energy
619	Project Facilities Management Ltd
620	PRP
621	Public and Commercial Services union
622	Purdie Electrical
623	Pure Solar Ltd
624	PV Solar Soltions Ltd
625	QUANTOCK ECO
626	Queens Cross Housing Association
627	Quest Electrical Ltd
628	Quoin Estates & Developments
629	R A Evans and son
630	R J B ELECTRICAL SERVICES Ltd
631	RB Grant
632	RBA consulting
633	REA
634	Reading Borough Council
635	Real Renewable Energy ltd
636	Reculver Limited
637	Redcar & Cleveland Borough Council
638	Redmile Energy
639	Redmile Energy
640	ReEnergise Limited
641	Rees Pryer Architects LLP
642	Regen SW
643	Regeneco

644	RenEnergy Ltd
645	Renewable Energy (REAL) Assurance Scheme
646	Renewable Energy Club - Warwickshire (Member)
647	Renewable Energy Co-operative
648	Renewable Energy Systems Limited
649	Renewable Resources ( energy Solutions) Ltd
650	Renewable Solutions UK Limited
651	Renewables Cornwall Ltd
652	RenewableUK
653	Responding in an individual capacity
654	Retail Energy Forum
655	Retrofit for Housing
656	RH Ridley (builders)
657	Riverside
658	ROBERT Pearce
659	Rock & Rescue R & R
660	Roland Hill Ltd
661	Ron Law Central Heating Services Ltd
662	Roof Energy Ltd
663	Royal Borough of Kensington and Chelsea
664	Royal Institution of Chartered Surveyors (RICS)
665	Royal National Lifeboat Institution
666	rudge renewables
667	Rural Community Action Nottinghamshire
668	Ryan Electrical Services
669	Salcombe & District Swimming Pool Association
670	Salcombe Swimming Pool
671	Salix Homes
672	Sam Green
673	Santander UK Plc
674	SAVING ENERGY PARTNERSHIP

675	Scarborough Borough Council (SBC) (response submitted on behalf of the Sustainability Working Group of SBC)
676	SCCI Energy
677	SCHOTT Solar UK
678	Scottish Federation of Housing Associations
679	Scottish Government
680	Scottish Land & Estates
681	Scottish Microrenewables Working Group
682	Scottish Natural Heritage
683	Scottish Renewables
684	Scottish Water
685	ScottishPower
686	Select Electrical Services
687	Sembcorp Bournemouth water
688	senate electrical
689	SEREN ROOFING
690	Serkit
691	Services for Communities, The City of Edinburgh Council
692	SeSaMe
693	Severn Trent Water
694	SHA Estates
695	Shad Smith
696	SHAP
697	Sharenergy
698	Sharp Solar
699	Sheffield City Council
700	Sheffield City Council Shadow Cabinet Member for Environment & Transport,
701	Shoreline Housing Partnership Ltd
702	Shropshire Rural housing Association Ltd
703	Silvercrest Solar
704	Skanska Infrastructure
705	Smart Power Solutions LLP
706	SmartestEnergy Limited
707	SMC International

708	Social Economy & Co-operative Development Cornwall Limited (Trading as Kabin Ltd)
709	Solar City UK
710	Solar Communities LLP
711	Solar Concepts
712	Solar Dawn Ltd
713	Solar direct savings LLP
714	Solar Dynamics Ltd
715	SOLAR ELECTRICTY SYSTEMS
716	Solar Energy Education
717	SOLAR ENERGY SYSTEMS
718	SOLAR ESSENCE
719	Solar logic ltd
720	Solar Panelling Ltd
721	Solar Power Scotland
722	solar pv
723	Solar PV Power
724	Solar Savings UK Ltd
725	Solar Securities (Group) Ltd
726	Solar South West
727	SOLAR SPECTRUM LTD
728	Solar Technology International Ltd
729	Solarcentury
730	Solarenergy4life
731	Solarfit PV
732	Solargen Energy Ltd
733	SOLARLEC PV SOLUTIONS LTD
734	Solarlec PV Solutions Ltd
735	Solar-rise
736	SolarScotland
737	Solec(North East) Ltd
738	Solway Solar Systems
739	Somerset Solar Electric
740	Somerset West Private Sector Housing Partnership
741	Source Solar (UK) Ltd
742	South Hinksey Village Hall Management Committee (Chairman)
743	South Holland District Council
744	South Kintyre Development Trust

745	South Somerset District Council
746	South west free energy
747	South West Water Ltd.
748	Southern Electrical Services UK LTD
749	Southern Solar Ltd
750	Southern Water Services
751	Spencer Guy
752	Spirit Solar
753	Spot-On Electrical Ltd.
754	Springfield Farm
755	SRP Scaffolding Ltd.
756	St Edmundsbury Borough Council
757	St Helens Primary School
758	St John's Church
759	St John's Church, Felbridge
760	St Luke's Church, Newton Poppleford
761	Stafford Area Community Solar Scheme
762	Staffordshire County Council -
763	Stephen Pogmore
764	Steve Duckworth Electrical
765	Steyning 10:10 Climate Action Group
766	Stirling Council
767	Stirling Society of Architects
768	Stockport Homes
769	Stockton-on-Tees Borough Council
770	Stoke Gabriel low-e group
771	Storaway Partnership
772	Strategic Community Infrastructure (SCI) Partnership Ltd
773	Strategic Energy Limited
774	Stretton Climate Care (Charity No 1123211)
775	Stroud District Council
776	Stuart Rennie Consulting
777	Student of Renewable Energy
778	Suffolk Coastal District Council and Waveney District Council
779	Suffolk County Council

780	SummitSkills
781	Sun direct
782	Sunderland City Council
783	Sundog Energy
784	Sunergy Uk
785	Sunetric Limited
786	Sunsparks Limited
787	Surrey County Council
788	Sustainable Bishopston
789	Sustainable Crediton
790	Sustainable Crediton
791	SUSTAINABLE CREDITON PV BUYING GROUP
792	Sustainable Homes
793	Sustainable South Brent
794	Sustainable Wallingford
795	Sustainable Woodstock
796	Sustaining Dunbar
797	Sutton & East Surrey Water Services Ltd
798	Sutton and East Surrey Water
799	Sutton Upon Derwent Village Hall
800	Switching2solar
801	Synergy Cables Ltd
802	T B Electrical contractors
803	T C Young
804	Tablehurst and Plawhatch Community Farm
805	Tameside MBC
806	Taunton Deane Borough Council
807	Taylor's Services
808	TCIB Installations
809	TEAM (Energy Auditing Agency Ltd.)
810	Teisen Products Ltd
811	Telco UK plc
812	Telford Friends of the Earth
813	Teme Valley Primary Partnership
814	Tesco
815	TETRIS LTD
816	Thamesway Ltd

817	The Anglesey Sea salt Company Limited
818	The Association for the Conservation of Energy
819	The Association of Chief Estates Surveyors and Property Managers in the Public Sector (ACES)
820	The Astronomy Roadshow
821	The Baptist Union of Great Britain; The Methodist Church; The United Reformed Church; The Quakers in Britain
822	The Big Green Energy Company
823	The Brand Nursery
824	The Chartered Institute of Building
825	The Church of England - Shrinking the Footprint
826	The Co-operative
827	The Electrical Contractors' Association
828	The Energy Saving Team Ltd
829	The Energy Warehouse Ltd.
830	The Evans Group
831	The Leys School, Cambridge
832	The Little Green Solar Co
833	The Low Carbon Economy Ltd
834	The low carbon energy company
835	The NAPIT Group
836	The Riverside Group
837	The Solar Building Company Ltd
838	The Solar Company
839	The Solar Trade Association
840	The United Reformed Church, Yorkshire Synod
841	Tilen Electrics
842	Torbay Council

843	Torfaen County Borough Council
844	Total Electrical Solutions (SE) Ltd
845	Totnes Solar
846	TP Electrical Contractors(SW)Ltd
847	Tradeskills4U
848	Transition Belper
849	Transition Edinburgh South
850	Transition Evesham Vale
851	Transition Eynsham Area (GreenTEA)
852	Transition Lavenham CIC
853	Transition Leicester
854	Transition Linlithgow
855	Transition Minehead & Alcombe
856	Transition Newton Abbot
857	Transition Town Letchworth
858	Transition Town Letchworth
859	Transition Training and Consulting
860	Treberva Fruit Farm
861	Treieve Organic Farm
862	Trevor Melhuish
863	Treworgey Cottages
864	Tripp's
865	Tritec Energy Ltd
866	TRJ Electric & PV Solar
867	True Energy
868	True Energy Ltd
869	Truphet UK Ltd
870	Truro Aerodrome Ltd
871	TURNING POINT
872	UCS Renewables
873	UK ELECTRICAL TESTING
874	UK ELECTRICAL TESTING
875	UK Green Building Council
876	Understanding Risk Research Group, Cardiff University
877	United Church Crowborough
878	University College London
879	University of Leicester
880	University of Liverpool

881	University of Liverpool
882	University of St Andrews
883	Upsolar
884	V P Designs
885	Vela Housing Group
886	Verulam Electrics Ltd
887	village green solar
888	Village Green Solar
889	Visionjuice
890	Vital Energi Solar
891	W.E.S. Electricians
892	Wadsworth Jones Consulting Ltd
893	Wallace Interior Solutions Limited
894	Wallen DOWn
895	Wall-Lag Group
896	Wandsworth Council
897	Wards Electrical
898	Warrington Borough Council
999	Waterside Electrical Services
900	Wates Living Space
901	Watt-Knots Limited
902	Waverley Borough Council
903	Waverley Tenants Panel
904	WCHP
905	Wealden District Council
906	Welsh Government
907	Welsh Liberal Democrats
908	Wessex Water
909	West Coast Solar Ltd
910	West Lancashire Borough Council
911	West Lothian Council
912	West Sussex County Council
913	West Sussex Environment and Climate Change Board
914	West Tytherley Village Store Association
915	Wey Valley Solar Schools Energy Co-operative Limited and 2) Guildford and Waverley Friends of the Earth

916	Weymouth College
917	Wheatley M&E Services Ltd
918	Which? Ltd
919	White Cross Mission Community
920	Wigan and Leigh Housing company ltd
921	William Andrews RE Consultant
922	Wilson Kennett Partnership
923	WILSON KENNETT PARTNERSHIP
924	Winchester Action on Climate Change
925	Wirral Council
926	Woking LA21
927	Wokingham Borough Council
928	Wolverhampton City Council
929	Woodend Safety and Sustainability

930	Wrexham County Borough Council
931	Wychavon District Council
932	Yattendon Group
933	YESrenewables
934	YHA (England and Wales)
935	Yorkshire and Humber Microgeneration Partnership (YHMP)
936	YouGen Ltd
937	Your Homes Newcastle
938	Your Solar Energy Company Ltd.
939	Zero Fuel Homes Ltd
940	ZEST ENERGY SOLUTIONS

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Department of Energy & Climate Change  
3 Whitehall Place  
London SW1A 2AW  
[www.decc.gov.uk](http://www.decc.gov.uk)

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