**PART A: Statutory Consultation on the Renewables Obligation Order 2011**

**Please use the table below as a template to respond to the consultation. It will help us to record and take account of your views.**

**Also, please provide evidence for your answers and comments where possible.**

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| **PERSONAL DETAILS** |
| Respondent Name:Contact Address:Contact Telephone:Organisation Name:Would you like this response to remain confidential? Yes/No (Delete as appropriate)If yes, please state your reasons: |
| **CHAPTER 1: OFFSHORE WIND PHASING** |
| **Q1: Do you agree with the proposal to phase support for offshore wind to account for the longer construction period?**Yes/NoComments: |
| **Q2: Do you agree that phasing of capacity should be limited to once a year for a maximum of five years?**Yes/NoComments: |
| **Q3: How do you think the capacity to be included in each phase should be determined e.g. split equally or based upon operational capacity? Please give your reasons.**Comments: |
| **Q4: Do you think each phase should be metered separately or would a pro-rata approach be more appropriate?**Separately / Pro-rata approach (Delete as appropriate)Comments: |
| **Q5: Do you agree that the band applied to each phase should be the same as the band awarded at initial accreditation of that capacity?**Yes/NoComments: |
| **Q6: Do you think a minimum accredited capacity or any other criteria should apply to this policy i.e. the station or additional capacity must be a certain size to qualify? If so, what do you consider this should be?**Yes/NoComments: |
| **Q7: Do you agree that phased support should only be available for offshore wind generators?**Yes/NoComments: |
| **CHAPTER 2: SUSTAINABILITY CRITERIA FOR BIOMASS**  |
| **Q8: Is 60% saving (equating to 285.12 kgCO2/MWh)** **the right minimum GHG emission threshold?**Yes/NoComments: |
| **Q9: Do you agree that the sustainability criteria restricting the types of land used should be consistent with the criteria imposed on bioliquids by the RED?**Yes/NoComments: |
| **Q10: Do you agree that generators over 50kW should be required to report against the sustainability criteria from April 2011? Do you agree with the information to be included in the report?**Yes/NoComments: |
| **Q11: Do you agree that for biomass generators of 1 MW and above there should be a transition period of mandatory reporting against the sustainability criteria from April 2011, before compliance is formally linked to the receipt of ROCs from April 2013?**Yes/NoComments: |
| **Q12: Do you agree that for biomass generators below 1MW compliance with the sustainability criteria should not be linked to the receipt of ROCs ?**Yes/NoComments: |
| **Q13: Do you agree with the exclusion of waste and sewage gas and landfill gas? Should anything else be excluded?**Yes/NoComments:  |
| **Q14: Do you consider that sustainable forestry management practices should be a mandatory part of the criteria, or addressed in guidance? In particular how can the potential environmental impacts on woodlands be balanced against the compliance burdens on small businesses?**Mandatory / Guidance (delete as appropriate)Comments: |
| **Q15: Do you have any other comments on the proposals in this chapter?**Comments: |
| **CHAPTER 3: SUSTAINABILITY CRITERIA FOR BIOLIQUIDS**  |
| **Q16: Do you agree with, where applicable, using the RFA technical guidance to calculate greenhouse gas emissions savings?** Yes/NoComments: |
| **Q17: Do you agree that the ISAE 3000 standard should be regarded as an adequate standard for the independent audit report?**Yes/NoComments: |
| **Q18: Do you agree that Ofgem should have the power to revoke ROCs/withhold a commensurate number of ROCs in the next Obligation Period where the audit is late, qualified or not carried out?**Yes/NoComments: |
| **Q19: Are there other reasons, unrelated to sustainability grounds, why particular bioliquids ought to remain excluded from the RO?**Comments: |
| **Q20: Do you agree that we should maintain reporting criteria in line with those being proposed for solid biomass in Chapter 2?** Yes/NoComments: |
| **Q21: Do you have any other comments on these proposals in this chapter?**Comments: |
| **CHAPTER 4: REFURBISHMENT AND REPLACEMENT** |
| **Q22: Do you agree that additional support should be introduced for refurbishment and replacement in existing stations?**Yes/NoComments: |
| **Q23: Do you agree that this should be limited to cases of major refurbishment or replacement only?**Yes/NoComments: |
| **Q24: a. What should or should not be covered by the terms:** * **refurbishment of parts;**
* **replacement;**
* **major refurbishment of parts; and;**
* **major replacement?**

Comments (Please give reasoning and provide any evidence):**b. Should these terms be technology specific?** Comments (Please give reasoning and provide any evidence):**c. Could ‘major refurbishment’ and ‘major replacement’ be related to the number of generating components that are refurbished or replaced?** Comments (Please give reasoning and provide any evidence): |
| **Q25: In your view, is the repowering of wind turbines covered by the description of ‘replacement’ used in this chapter? If not, how does it differ and should it be treated differently from other technologies?**Yes/NoComments: |
| **Q26: Do you agree that any additional support for stations undergoing such major refurbishment or replacement should be less than for newly accrediting stations (or additional capacity)? Please give your reasoning and provide any evidence.**Yes/NoComments: |
| **Q27: Do you have a preference between a lower level of support, shorter duration of support ,or a combination of the two? Please give your reasoning and provide any evidence.**Lower level of support, shorter duration of support, combination of the two (Please delete as appropriate)Comments:  |
| **Q28: Do you agree that support should be provided to existing co-firing generation converting to dedicated biomass?**Yes/NoComments: |
| **Q29: If so, what is your view on the level of support that should be given to converted stations (i.e. should it be as for new stations or reduced)? Please give your reasoning and provide any evidence.**Comments: |
| **CHAPTER 5: RENEWABLE HEAT SUPPORT** |
| **Q30: Do you agree the Banding review should consider removing the uplift for CHP generating stations accrediting on or after 1st April 2013? Please provide evidence to support your answer.**Yes/NoComments: |
| **Q31: Do you agree that the CHPQA requirement for CHP stations should remain for those stations benefiting from the CHP uplift under the RO?**Yes/NoComments: |
| **Q32: Do you agree that the CHPQA requirement should remain for all EfW with CHP stations?**Yes/NoComments: |
| **Q33: Do you have any comments on the potential transitional proposals set out above for generating stations with CHP accrediting between 15th July 2009 and 31st March 2013?**Comments: |
| **CHAPTER 6: MUTUALISATION** |
| **Q34: Is there a need to change the mutualisation cap and trigger for the period** * 1. **up to 2015/16**
	2. **after 2016/17?**

**Please give your reasoning.**Yes/NoComments: |
| **Q35: If you think the mutualisation trigger should be changed at what level should it be set and what calculation process should be used? Please give your reasoning.**Comments: |
| **Q36: Should mutualisation payments be capped (and adjusted as they are now in line with inflation) and if so, at what level and why?** Yes/NoComments: |
| **Q37: Could smaller suppliers be disproportionately affected by significant increases in mutualisation fund payments? If so, what level of increase would give rise to such concerns?**Yes/NoComments: |