

From: [REDACTED] [REDACTED]@gmail.com]
Sent: 10 March 2011 17:14
To: Electricity Market Reform
Subject: Comment on EMR consultation

Dear Sir or Madam

Thank you for the opportunity to comment on these proposals, and for the excellent work carried out by DECC. Today's RHI announcement is one of many examples of well thought out policy.

Rather than comment on all the questions in the EMR consultation, it may be better to focus only on my main concern with most of the new generation of power stations.

The EMR proposals may inadvertently lead to a continuation of the less efficient centralised form of thermal generation where the use of waste heat is very unlikely. The proposed incentives seem to encourage very large coal power stations of well over 400MW capacity. It would be quite difficult to site such a plant in a way that waste heat could be put to good use.

In view of the DECC policy to encourage district heat networks and the use of heat which would otherwise go to waste, it seems important to take the opportunity offered by the EMR process to support this efficiency measure.

- 1) A more demanding emissions performance standard would reduce the incentive for coal power stations to be too large.
- 2) Any targeted capacity incentives could take into account whether it is likely that waste heat could be used.

Unfortunately, in spite of guidelines encouraging developers to consider heat loads during site selection, this does not appear to have influenced site location in most cases. Stronger signals appear necessary and the EMR could provide these.

Thank you very much once again.

Yours faithfully

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