

Richard

From: Vincent, Richard (ERG-ALE)
Sent: 16 March 2011 15:27
To:
Cc: Demain, David (ERG-ALE); Henderson, John
Subject: RE: IED and TNP

Thank you. That is my intention!

Richard

From:
[mailto:]
Sent: 16 March 2011 14:33
To: Vincent, Richard (ERG-ALE)
Cc: Demain, David (ERG-ALE)
Subject: IED and TNP

Richard,

I thought I would drop you a note following the last few meetings with Gov and regulators on IED implementation.

One of the themes through these meetings has been the extent to which the TNP will be taken up, and to some extent how it should be constructed/designed if there should be many plants included or few plants included. The EA almost seem to be suggesting that it may not be worth it if there only a handful of plants in it - this is worrying.

Hopefully you will have got the message at the last LCPD Stakeholder meeting that industry really do want the TNP available as an option, it is a very important part of the post 2015 arrangements. I am not sure what other sectors are interested in but certainly the electricity generators are less interested in trading than having the additional time in which to deliver SCR. Given the difficulty of this decision when faced with the uncertainty regarding EMR etc the extra time will be valuable.

From an Aberthaw specific perspective I know you appreciate the value of the TNP and our reliance on it as a near substitute for the LCPD low vol coal NOx derogation that has now gone.

From my point of view we must keep the TNP as an option and the number of plants that ultimately take the option is pretty much irrelevant, the methodology for calculating the annual mass emission allowance is set out in the Directive and, if we follow the NERP model, that will be the allocation to the plant. Retaining as much flexibility as is allowed under the IED text regarding the TNP (i.e. early exit, transfer to 1500 hr derogation) will tend to encourage participation, whilst the closing down of such flexibility will tend to discourage participation.

I may be worrying unnecessarily but would appreciate your reassurance that it is intended to keep the TNP available as an IED compliance route.

Regards

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