### Received by email – from Solar Roof Solutions Ltd

#### Dear Gareth

I've just been made aware of the latest draft G83/2 proposals, which contains some proposed changes to the process for determining whether a sub 16amp system should be required to obtain advance permission to connect to the grid.

I wanted to make clear that I think that this move is unworkable and will have a detrimental effect to the future of the micro generation industry, as well as for the efficiency of the DNOs and I urge you to withdraw this proposal.

As a small solar PV installer who relies on customer recommendations as its main source of business, as well as localised marketing, this proposal will cause us to operate at a major disadvantage in our own local areas. Customer recommendations tend to be in the form of neighbours, friends and family who all live within the same postcode areas. If we were forced to obtain advanced permission which meant that we were unable to install a system within a week (which we can currently do) then we will probably be overlooked in favor of a company from outside of the area who had not installed in the postcode region or within 500m of the installation.

The fact that a pre approval doesn't need to be submitted by a company that has not previously installed in the area is totally nonsensical. If it is accepted retrospectively via another installer then what does it matter who has done the installation?

You could argue that this opens up the market and gives us an advantage outside of our geographical area. In reality this would be a ridiculous policy meaning more travel, more advertising but no scope for building a good reputation. The policy will allow rogue traders to be shielded even further because a good company's reputation will be diluted and downcast because we were unable to install in as quickly as other companies who've not got any previous installations in our popular postcode areas. When there is a lot of time to play with, the reputable company will not suffer, but with the schedule of Feed in Tariff digression coming in every 4 months or so, this is where we will suffer as we will have to turn away last minute orders.

I would also raise concern that the measure will cause the entire G59 and G83 application process to be strained under the volume of new applications it will create. There are many reports within the industry that the system is already struggling in many areas, with applications across Northern PowerGrid reportedly taking up to 65 working days to be processed. If we have to wait 45 - 65 working days for permission to carry out a basic sub 16amp installation this will likely mean we'll not be able to promise to carry out those installations before the next quarterly FIT cuts happen.

Ofgem's stated purpose of "eliminating unnecessary regulatory and market barriers to the economic deployment of distributed energy" seems to be ignored in this instance, this measure is unnecessary and unless Ofgem and every single DNO can respond to pre applications within 24 hours or less, then the measure will create a large barrier to the deployment of distributed energy for the smaller installer.

Please drop this proposal in its entirety.

Your sincerely

### **Victoria Marks**

# Project Manager

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