David Halldearn Director, Scotland and Europe Office of Gas and Electricity Markets (Ofgem) 9 Millbank London SW1P 3GE Fax: 020 7901 7479 E mail BETTA.Consultationresponse@ofgem.gov.uk

Dear David,

Following receipt of the document

Small Generator Issues under BETTA
Ofgem/DTI consultation November 2003
A Summary under Contract K/EL/00260/01/00 by EMS Consulting Limited

via BWEA we have the following comments to make

1) We are a small wind turbine manufacturer installing many 1-15kW small wind turbines, many assisted via grant programme e.g. <a href="http://www.clear-skies.org">www.clear-skies.org</a>

2) We are keen to see that no further new regulations which make it difficult for us to connect to grid and operate are brought in. (G83 and modification P81 have both introduced substantial problems for us). We are not regs experts in any way and therefore comments below are the

best we can make in the circumstances. We are squeezed on several sides; by the DCHP community employing full time people to bring about regs change that do not suit small renewables and by existing "large scale" electricity energy industry keen to prevent massive DCHP penetration of network in future.

2a) Please create a new class of generators called "micro" which are considered against all regs as a subset of small. I would suggest "micro" < 100kVA</pre>

3) I note on that 50-100MW generators are exempt from holding generator license.

Can you confirm that micro generators are also exempt?

4) Please make sure that micro embedded generation does not have to "enter into bi-lateral agreements with the Transmission System Operator".

5) Micro generation cannot afford to and should not be asked to pay for transmission charges TNUOS BSUOS and Connection charges.

6) Ditto distribution charges.

If you would like to visit a Proven small wind turbine connected to grid we will be happy to arrange this.

Regards, Brendan Reid

Brendan Reid

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