

Mike O'Carroll response.txt

From: Mike O'Carroll [ocarroll@weights.demon.co.uk]  
Sent: 20 April 2004 13:35  
To: Nienke Hendriks  
Subject: EDPCR Policy Document: response

Response to EDPCR Policy Document from Professor M J O'Carroll. 20.4.04

With reference to 5.35 - 5.38 on incentives for Distribution Network Operators (DNOs) to facilitate distributed generation (DG) and in particular microgeneration, the incentive should indeed apply to microgenerators for the following reasons. Microgenerators will be an important feature in improved efficiency and government CHP targets, as well as potentially relieving pressure on network capacity and stability arising from intermittent renewables.

Given the general acceptance (in 4.69) of the broader environmental responsibilities of DNOs, reporting requirements should be strong enough to ensure transparency of environmental impacts and of the effectiveness (or not) of measures and controls. Therefore I support the Ofgem proposals in 4.71. Stakeholder dialogue is a further helpful device to make the Schedule 9 Statements more meaningful and effective.

With reference to 4.72, it will be important to find appropriate financial incentives for environmental performance, and I hope this will not be unduly delayed. To leave it until after the period of the next price control would be too long and without a stated justification. At the very least, Ofgem should set out the pros and cons and put its justification in writing.

With reference to 4.76 on undergrounding, Ofgem should consider the full range of costs and benefits, not merely the costs. The public benefits can include matters of amenity, quality of life, property value, perceived and scientifically possible harm to health, and network security (not least in an age of terrorist threats, though these might apply more to transmission).

Further on undergrounding, by way of encouraging innovation (section 5 and 5.43), Ofgem should assess the state of the art for high temperature superconducting cables (HSC) and in particular very low impedance (VLI) cable configurations, and take into account their potential economic and other benefits. A "white paper" of Aug 2003 from the American Superconductor Company (and others) sets out "concepts, operational implications and financial benefits".

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Mike O'Carroll