

From: Pickstone Simon
Sent: 10 March 2008 10:43
To: Andrew MacFaul; Anna Kulhavy
Subject: Response to consultation - Distributed Energy Production.

Hi Andrew/Anna

I really don't know much about this area at all but I am currently drafting local policies relating to renewable energy/energy efficiency/sustainable development as part of our LDF and so am trying my best to get up to speed with decentralised energy provision. This will be a key growth area once people get to grips with all the complexity!

Appendix 9 - Feedback Questionnaire

1.1. Ofgem considers that consultation is at the heart of good policy development. We are keen to consider any comments or complaints about the manner in which this consultation has been conducted. In any case we would be keen to get your answers to the following questions:

1. Do you have any comments about the overall process, which was adopted for this consultation?

I was not aware of the consultation until I asked some advice from the Energy Savings Trust relating to whether or not costumers on private wire networks were regulated in any way. They gave me a link to your document. Perhaps you could consider publishing notification on sites such as LocalGov, PlanningResource (if you haven't already I and simply missed it?).

2. Do you have any comments about the overall tone and content of the report?

Haven't read the whole thing but what I did read was clear and well written.

3. Was the report easy to read and understand, could it have been better written?

Thought it was fine.

4. To what extent did the report's conclusions provide a balanced view?

Didn't read the conclusions.

5. To what extent did the report make reasoned recommendations for improvement?

No comment.

6. Please add any further comments?

I have a particular concern relating to gas-fired CHP. There is confusion within Government over whether or not gas-fired technology is low-carbon or not. BERR's Low Carbon Building Programme does not consider large scale gas fired CHP as being a renewable technology but under State Aid gas fired CHP is considered as being low-carbon technology. This is further aggravated by the wholly inadequate definition of 'low-carbon' in PPS1 Supplement: "Low-carbon technologies are those that can help reduce carbon emissions. Renewable and/or low-carbon energy supplies include, but not exclusively, those from biomass and energy crops; CHP/CCHP (and micro-CHP).." My concern is that as decentralised energy production becomes the more popular choice, those installing the technology will naturally choose gas-fired equipment first. This (in my view) is not from a renewable source if it is coming from natural gas sources in Europe but it will get recognised and rewarded as such due to badly thought out policies. The other issue here is that focusing on gas-fired technology in the short to medium term will fail to stimulate and support more legitimate renewable sources such as biogas/biofuels which will result in further disruption/costs when natural gas supplies run out.

As mentioned before, this area is advancing rapidly. Non-technical people such as me who are drafting policies which will ultimately guide local development in this area need to have better guidance on this complex subject. A guide for planners and decision-makers in this area would be extremely helpful.

Many thanks, Simon

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