

Mark Feather
Industry Codes & Licensing
Ofgem
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16 January 2009

Dear Mark

Code Governance Review: Environment & Code Objectives

Many thanks for the opportunity to respond to this open letter on the code governance of environment and code objectives.

Scottish Renewables is the renewable energy trade association for Scotland and supports the interests of nearly 250 members many of which are working in the renewable electricity sector.

This response has been drafted following consultation with the Scottish Renewables' membership. You can find out more about Scottish Renewables by visiting our website at www.scottishrenewables.com.

Your open letter asks two straightforward questions:

1. Should code panels consider the impacts that their decisions will have on the emission of green house gases; and,
2. Should code panels consider the impacts that their decisions will have on wider environmental issues?

Scottish Renewables has consistently argued that the 'carbon impact' of decisions should be considered in the decision making of code panels and we note that this has been introduced following advice from Ofgem.

The approach currently adopted is by no means perfect but we expect this to evolve over time as experience is gained.

With regards to the consideration of wider 'environmental impacts', we do not believe that the code panels are best placed to assess wider environmental impacts. The environmental acceptability of network investments or new generation is properly governed by the planning process and environmental legislation. Any involvement by code panels in assessing wider environmental effect will replicate what the planning system is already expected to deliver.



Needless to say if you would benefit from clarification on any of the points made above then please do not hesitate to contact me here at Scottish Renewables.

Yours sincerely

Jason Ormiston
Chief Executive