

FAO Frances Warburton  
Partner, Energy Systems  
Ofgem  
9 Millbank  
London  
SW1P 3GE

22 September 2016

Dear Ms Warburton,

You have invited stakeholders to comment on your open letter on charging arrangements for embedded generation, dated 29 July 2016.

Singleton Birch operates 3 AD plants in Lincolnshire with a combined installed capacity of 3MW. We have more installed capacity than we can operate on a continuous basis and we use the additional capacity at peak times such as when we expect Triad's. We subscribe to a Triad warning system and ensure we operate at 3MW when there is a Triad warning. This depletes our biogas store which we replenish overnight by reducing output to typically 1.5MW. Without the Triad incentive we will have no incentive to operate in this way.

Another factor that should be considered by Ofgem and Government is that by removing incentives after companies have made investments will deter future investment in renewable energy projects.

My company board has already increased the IRR that is required from future renewable investments to compensate for what is seen as an increased risk that the Government will introduce further changes in the future that will impact negatively on the renewables industry.

In summary, losing Triad income will significantly reduce the income of our energy business, will further damage the confidence of our company to invest in future renewable projects, and will change our operational behaviour during Triad peaks.

I hope that after consideration you will leave things as they are and perhaps consult further with the industry about the impact this will have.

Yours sincerely,

Martin Haworth  
Technical Director, Singleton Birch  
Managing Director, Birch Energy

