



Infinis Limited
First Floor, 500 Pavilion Drive
Northampton Business Park
Northampton NN4 7YJ

T +44 (0)1604 662400
F +44 (0)1604 662468

www.infinis.com

18 April 2017

Andrew Self
Ofgem
9 Millbank
London
SW1P 3GE

Email: electricitynetworkcharging@ofgem.gov.uk

Dear Sir,

Minded to decision and draft Impact Assessment of industry's proposals (CMP264 and CMP 265) to change electricity transmission charging arrangements for Embedded Generators

The Infinis group of companies is pleased to enclose our response to the Ofgem consultation on charging arrangements for embedded generators.

We develop, own and operate a portfolio of renewable, embedded plant now principally comprising baseload landfill gas-fuelled generation together with some peaking plant. We currently operate almost 300MW of capacity across 121 sites. Our UK operations benefit from a sophisticated 24/7 environmental compliance and plant performance monitoring and optimisation system developed internally and based in our Northampton head office.

As a key stakeholder in the embedded generation market (generating around 5% of the UK's renewable electricity) we support any plans which will allow for efficient and fair charging for network usage. Unfortunately, we do not believe that Ofgem's "minded to" proposals will achieve these aims. More fundamentally, we do not agree with the premise that embedded benefits are distorting the market and the supporting evidence or analysis, both during the working group stage and in this consultation and impact statement, is notably lacking. A robust analysis of any such evidence is a vital starting point as is a consideration of other factors which we rather suggest are causing an increase in transmission network charges or are relevant for a "level playing field" if this is the objective. We accordingly believe that the proposals reflect undue haste. A targeted charging review and possible significant code review are the subject of a separate consultation, clearly inter-linked with these proposals and we suggest that they should take precedence over this consultation.

Finally, we believe that the consultation has been too quick to dismiss the analysis by Cornwall Associates of the value of embedded generation as flawed without further explanation or alternative analysis.

We look forward to a positive outcome from this consultation which comes at a time when GB has a real opportunity to head into a new phase of small, embedded, decentralised energy which will allow for greater security of supply, lower network costs and the opportunity to generate power much closer to the end user.

Should you have any questions in relation to our views please do not hesitate to contact Christopher Granby on (01604) 662450.

Yours faithfully,



James Milne
Director