

Renewable Electricity Development Team  
Renewables & CHP  
9 Millbank  
London  
SW1P 3GE



Dear Sir / Madam,

**Re: Renewables Obligation closure to onshore wind: Consultation on grace period declarations**

Simple Power welcomes the opportunity to respond to the four-week consultation on draft amendments to guidance on the closure of the Renewables Obligation to onshore wind in Great Britain and Northern Ireland.

The consultation document sets out that some amendments are being taken forward to the "Declaration of grid or radar delay condition" and the "Declaration of investment freezing condition".

Whilst a representative attended the public consultation event in Belfast on 30<sup>th</sup> May 2017 we would also make the following brief comments in relation to the questions raised as part of the consultation.

1. Do you have any concerns relating to the proposed declarations as set out in this document? If so, please provide specific comments.

Grace periods are extremely important in that they enable small onshore wind generation capacity to gain accreditation under the NIRO between 1 July 2016 and 31 March 2019. Whilst grid delays are the most common cause for grace period applications, it is envisaged that all options will be utilised.

It is therefore vital that the conditions around these grace periods are properly understood by developers and also that they are in line with the original intent of the legislation. In that respect we welcome the clarifications offered through the revised template declarations.

2. Are there any aspects of the declarations that could be made clearer or improved? If so, please provide specific comments.

We are content that the changes now allow for more than one permitted cause of delay in relevant circumstances as well as clarifying the anomaly whereby, if taking a literal translation of the guidance, a developer would not have been able to qualify under the final grace period if their planned grid works completion date is after 31 March 2017.

I trust that you will keep us informed of any further issues arising in relation to the NIRO closure and associated guidance.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Philip Rainey".

PHILIP RAINEY  
Chief Executive  
Simple Power