

Subject: response from Wind Farm Analytics Ltd by 20th July regarding onshore ROC changes  
From: Wind Farm Analytics Ltd  
To: onshorewind@decc.gsi.gov.uk  
Date: 17/7/2015 18:50

Dear Sir/Madam,

With regard to the recently proposed changes to the Renewable Obligation Certificate (ROC) system, please urgently reconsider the proposed changes for the following reasons:

- 1) This proposal is damaging to many UK businesses including wind farm developers, land management companies, investors, planning companies, environmental specialists, construction companies, electrical engineering companies and many more support industries. In case projects are cancelled many such UK companies will be set back in their contribution to the UK economy as well as being set back in strengthening their capability to export expertise and products to the worldwide wind industry, an ever growing market.
- 2) You will be aware that wind farm projects take many years to plan, including obtaining land owner agreements, grid connection and various permissions including satisfying planning conditions which rightly weigh up economic and energy system advantages of wind farms against visual impact and other impacts. Therefore a sudden change in policy with such short notice will unduly impact present projects, causing loss of employment and in one fell sweep rendering already committed investment and human effort to be useless.
- 3) Very much damage is already being done by this proposal because, it sends out a message that UK government cannot be relied upon to avoid unnecessarily intervening at short notice. Such policy indicates that the UK is not a safe place for investment. What will come next? Can government be relied upon not to pull the carpet out from existing investments and projects which are already committed? This seems inconsistent and at odds with the previously stated strategic priority of "unlocking investment to support economic growth".
- 4) The Conservative party and government traditionally takes great pride in being a friend of business, avoiding wasteful expenditure and supporting economic development. Is it not inconsistent with Conservative free market principles to intervene by suddenly moving the goal posts of the ROC system? Please rectify this inconsistency.
- 5) Please note that onshore wind is rapidly becoming cost-competitive against fossil fuels and, with consistent ongoing support, will eventually be of great benefit in addressing the first stated "trilemma" objective of reducing cost to the consumer.
- 6) Please note that onshore wind does not involve export of national wealth to distant and unreliable mineral suppliers. The generating assets and jobs are within local communities and are robustly and resiliently distributed. Although onshore and offshore wind power have a degree of unpredictability there are also well-established long-life efficient low carbon methods to balance and manage this, such as by constructing more pumped hydro energy storage. Therefore onshore wind can contribute positively to the second stated "trilemma" objective of improving UK security of supply.
- 7) Please remember the third stated "trilemma" objective which is to decarbonise our energy system. Onshore wind is recognised world wide as the cheapest method to achieve this goal.
- 8) This year the international community is meeting in Paris in order to agree new international decarbonisation objectives. A previously stated strategic priority is that the UK will play "a leading

role in efforts to secure international action to reduce green house gas emissions and tackle climate change". Please demonstrate more support for onshore wind because the UK is at risk of being perceived as anti-renewables.

9) The strength of the UK offshore wind industry depends upon the strength of the UK onshore wind industry. This is because there are many common attributes and therefore by damaging the UK onshore wind industry this policy will also have damaging effects on the UK offshore wind industry - one of the few major industries where the UK is the number one world leader.

Please entirely withdraw the proposed change to the ROC system on the above basis.

In case that you are determined to proceed with the policy of holding back UK onshore wind development, despite the aforementioned apparent inconsistency and economic impacts then please compensate project developers for their relevant receipted and contracted spend commitments so far.

Yours Sincerely, Dr Theodore Holtom (Director, Wind Farm Analytics Ltd)