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Organisation Name

Organisation name:Sustainable Crediton

Organisation Type

Organisation type:Charity/Community Group

If other please specify:

Would you like this response to remain confidential?

No

Reason for confidentiality:

Q1. Do you agree or disagree with the proposed new tariffs for solar PV? Give reasons to support your answer.

Disagree

Please provide your comments:Sustainable Crediton are most concerned and angry to hear that the government has announced proposals to bring forward a 50% cut in a key incentive for renewable energy – the feed-in tariff. We are, therefore, writing to you to call for changes in tariffs to be made from 1st April 2012 as originally planned (the Do Nothing scenario in the Government's Impact Assessment) and for a requirement for some (but not level C EPC) energy efficiency measures to be introduced. The government's own impact assessment shows that doing nothing only adds just £25 per year to average energy bills in 2020, a trivial amount compared to the massive rises in energy bills experienced this year alone due to fossil fuel cost increases and excessive profits taken by the "Big Six" energy companies. "Doing Nothing" will result in the continuing massive uptake of solar PV, a capacity of 12300 Gigawatt hours of clean green home generated electricity in 2020 (the equivalent of 2 new nuclear power stations) and burgeoning Solar PV and energy efficiency industries. Sustainable Crediton has invested significant volunteer time and effort in planning and implementing our solar scheme, which has been praised by our MP Mel Stride, for homes and community buildings. In making this announcement the Government has given our installer, Solarsense, just six weeks to complete installation of over 30 orders within the new deadline of 12th December and several orders have been cancelled as a result. We urge the Government to amend their proposals and extend the deadline for solar tariff payments to enable all our current orders to be completed and receive the existing 43.3p/KWH feed-in tariff as originally envisaged. Our members have acted in good faith in placing orders under our scheme believing that any review would not come into effect until 1st April 2012. We believe that the Government, by setting the new deadline at the 12th December 2011, have already decided the results of the consultation as it does not close until the 23rd December, and the results cannot possibly be known until the New Year. Our scheme has been incredibly successful up to the end of October, but we envisage little further take up if and when the tariff drops to 21p. We make this assessment using the uptake calculations employed in your Impact Assessment as mentioned further below. Although not included in our scheme we are aware that the Haywards School solar project is impacted, as well as Mid Devon District Council's plans to fit 1400 council houses and buildings with solar panels. This latter project would have helped lift many council tenants out of fuel poverty. The south west of England has excellent renewable energy resources that can be at the heart of a prosperous low carbon economy in the future. Research by Regen SW shows that the feed-in tariff has led to over 14,500 solar PV installations in the south west, bringing the benefits of secure and sustainable decentralised energy to many homes, communities and businesses. Furthermore, 2,000 jobs have been created in the solar PV sector in the south west during difficult economic times and over 380 companies have passed the necessary certification to install renewable energy. This Government announcement puts much of this good work in jeopardy with the solar industry reporting that redundancies could be confirmed within the next month as a result of these changes. Our own contracted installer, Solarsense, has advised us that they are considering letting between 13 and 16 people go after the December deadline has passed. Additionally they will have no requirements for the local electrical contractor and scaffolding company they have hired to help install the Crediton orders. Finally let us put into a wider context the importance of the feed-in tariff. The Government has committed to an 80% reduction in carbon emissions by the year 2050 in its efforts to counter global warming. The Government is also very concerned about fuel security knowing that peak oil is imminent. The Government recognises that growing our own green renewable energy supply is vital to our future, not just for the energy supplies but also economically because of the rising cost of importing

fossil fuels. FITs were introduced on 1 April 2010, with all political party support as one aspect of a multi component approach which also includes the wide scale use of wind turbines, the building of carbon capture and storage experimental plants, and additional nuclear capacity. Through the use of FITs the Department of Energy and Climate Change hoped to encourage deployment of additional small scale low carbon electricity generation, particularly by organisations, businesses, communities and individuals who had not traditionally engaged in the electricity market. This was intended to allow many people to invest in microgeneration, in return for a guaranteed payment for the electricity they generate and export. By frequently changing the terms and conditions of the FITs schemes the Government will run the risk of losing credibility with the constituency it is trying to encourage, namely organisations, businesses, communities and individuals. By reducing the FIT to a level where it is not economically viable for business, the Government runs the risk of killing off an industry which was set to make a massive contribution to the nation's green energy supplies. In its own analysis the Government estimates that the take up of below 4KW systems will reduce by 70% and the take up of between 4 – 50 KW by 95% after April 2012 compared with take up under the higher FIT rates. This level of take up does not require the employment of solar businesses at the current levels and must therefore result in redundancies. Whilst many feel that the current FIT rates for solar PV are too generous, reducing them to a level which results in the destruction of a new industry and does not produce an appreciable uptake of green solar energy over the next 25 to 35 years rather defeats the purpose of the scheme. In our opinion, not changing the rates, other than going to the degression tables already planned for April 2012 which reduces the rates by 12% plus adding in the requirement for some energy saving measures but not requiring EPC Level C will somewhat cut demand but will also create an enlarged energy efficiency industry resulting in a blossoming PV and energy efficiency business.

Q1. File upload:Not Answered

Q2. Do you agree or disagree with the proposal of applying the new tariffs to all new solar PV installations with an eligibility date that is on or after a reference date that comes before the legal implementation of those tariffs? Give reasons to support your answer.

Disagree

Please provide your comments:We believe that the Government, by setting the new deadline at the 12th December 2011, have already decided the results of the consultation as it does not close until the 23rd December, and the results cannot possibly be known until the New Year. One of the three options proposed by the Government just happens to require the FIT to be reduced to 21p from the 12th December 2011.

Q2. File upload:Not Answered

Q3. Do you agree or disagree with the proposed reference date of 12 December 2011? Give reasons to support your answer.

Disagree

Please provide your comments:There should not be a reference date . If this is a genuine consultation, then any reference date should be after the consultation has ended and after the results have been announced. There should be time after the announcement for individuals , groups and businesses to adequately plan before the reference date applies.

Q3. File upload:Not Answered

Q4. Do you agree or disagree with the proposal to introduce new multi-installation tariff rates for all new solar PV installations that meet the definition set out above and have an eligibility date of on or after 1 April 2012? Give reasons to support your answer.

Disagree

Please provide your comments:There should be no disincentive for multiple installations applicable to social housing , affordable housing or community buildings. The Government's proposals call for a reduction in tariff for multiple installations. In Mid Devon such a scheme operated by Mid Devon District Council would have fitted 1400 social houses with solar panels thereby assisting those tenants in fuel poverty. Some of the FIT was also going into a social housing fund. This scheme is now in jeopardy. We should be encouraging the fitting of solar panels on every suitable roof and by all means possible :- private individuals, community schemes, private profit businesses. We need more PV not less.

Q4. File upload:Not Answered

Q5. Do you agree or disagree with the proposed multi-installation tariff rates? Give reasons to support your answer.

Disagree

Please provide your comments:See our answer to question 4.

Q5. File upload:Not Answered

Q6. Do you agree or disagree with the proposal that for solar PV attached to a building, eligibility for the standard tariffs proposed in chapter 2 should be contingent on a minimum energy efficiency requirement being met? Do you have views on whether such a requirement should apply in relation to all buildings or just to dwellings or non-domestic buildings? Give reasons to support your answer.

Disagree

Please provide your comments:We think it is appropriate that building occupiers explore all sensible options for reducing their energy consumption before they install solar PV. By sensible we mean options like loft insulation and cavity wall insulation, where it can be fitted. Many rural properties are older, solid walled buildings and to insulate these to EPC Level C would be very expensive. Therefore there should be exemptions for such properties. Furthermore, energy efficiency is not strictly relevant for PV as PV generated electricity tends to be used to operate electrical appliances and is not generally used for heating. The net effect of these proposals as stated (especially when considered together with the proposed huge reduction in the level of FiTs) would be to greatly reduce the number of buildings that could or would ever be considered for installing PV. From a renewable energy point of view this would be a very backward step. I think the Government realise this in their own figures where demand for PV falls dramatically as a result of the proposed new measures.

Q6. File upload:Not Answered

Q7. Which of our two lead options for the energy efficiency requirement – requiring a building to achieve a specified EPC rating, or requiring the installation of all measures that are identified on an EPC as potentially financeable under the Green Deal - do you prefer for (1) dwellings, and (2) non-domestic buildings? Give reasons to support your answer.

1) Dwellings:Requiring the installation of all measures that are identified on an EPC as potentially financeable under the Green Deal

2) Non-domestic buildings:Requiring the installation of all measures that are identified on an EPC as potentially financeable under the Green Deal

Please provide your comments:See answer to Q6. We do not believe all measures financeable under the Green Deal will be appropriate for all buildings. Only those measures which are economically viable for a particular building should be required. Eg externally cladding a solid walled building to meet EPC level C is not appropriate.

Q7. File upload:Not Answered

Q8. Under the first option for the energy efficiency requirement, do you agree or disagree with the proposal that the EPC rating required to be achieved should be level C or above? Give reasons to support your answer.

Disagree

Please provide your comments:See answers to Q6 and Q7

Q8. File upload:Not Answered

Q9. Do you agree or disagree with the proposal that, for a transitional period only, all solar PV installations attached to a building should initially qualify for the standard tariff, and their continued eligibility for that tariff should be conditional on the building to which the PV installation is attached achieving the energy efficiency requirement within a specified period? Give reasons to support your answer.

Disagree

Please provide your comments:Phasing in off energy efficiency requirements is a sensible option. However, see our answers to Q 6 and Q7 for our reasons for disagreeing with having to qualify for a specific EPC level.

Q9. File upload:Not Answered

Q10. Do you agree or disagree that this transitional arrangement should apply to installations with an eligibility date on or before 31 March 2013, and that the specified period should be 12 months from the installation's eligibility date? Give reasons to support your answer.

Agree

Please provide your comments:If it agreed that some energy efficiency measures are going to be required in order to qualify for FIT payments then a 12 month period is a reasonable transition period and March 2013 a reasonably far advanced date for it to apply.

Q10. File upload:Not Answered

Q11. Can you identify any other issues, besides those discussed in this chapter, in relation to the implementation of an energy efficiency requirement for (1) dwellings, and (2) non-domestic buildings?

Please provide your comments:We urge the government to restore the previous 31st March 2012 deadline, waiving the accelerated timetable and the proposed Reference Date. The Government should consider an exemption for all existing non-for-profit groups from the reduction in Feed-in Tariffs, in recognition of their contribution to communities and 'the Big Society'. A possible definition of a not for profit group might include:--A purpose of social benefit above just the generation of renewable power-Developing projects within the geographical community that they are based in-Having a membership that is largely from the locality and representative of the community-Retaining assets and financial returns within their own social purpose enterprise or for wider community benefit indefinitely-Paying investors rates of return that are required to maintain adequate capital invested but no more than this

Q10. File upload:Not Answered