

**NIRIG response to the DETI consultation on the Proposed Changes to the Northern Ireland
Renewables Obligation**

21st October 2010

The Northern Ireland Renewables Industry Group (NIRIG), a collaboration between IWEA and Renewable UK welcomes the opportunity to respond to the DETI consultation on the Proposed Changes to the Northern Ireland Renewables Obligation. In particular IWEA would like to comment on the following two sections.

Refurbishment and replacement of generating equipment

NIRIG welcomes the proposal to provide support for generating stations that have undergone major refurbishments or replacements. This will incentivise efficient use of resources by allowing more efficient equipment to be installed with the potential to provide energy and carbon savings. For wind energy projects that may choose to dismantle rather than continue generating, the introduction of support for refurbishment/replacement may provide sufficient incentive to continue generating and therefore contribute to renewable energy targets.

NIRIG believes that the level of support for these projects may be dependent on the level of refurbishment undertaken and that there may be merit in introducing bands for different levels of refurbishment. A very clear what it is referring to by refurbishment and replacement is also required. Further analysis and consultation is required on the level or duration of support associated with the replacement or refurbishment of each type of renewable generation station.

NIRIG welcomes the proposal that new additional capacity installed at existing stations should be eligible for the same support as new stations.

NIRIG would like to raise concerns over the difference in end date between supports in NI and GB and would like to note that this can result in problems for financing. This also raises the question whether or not ROCs are the same in both cases.

Offshore Wind Phasing

NIRIG welcomes the proposal to phase support for offshore wind generation to account for longer construction periods. This support can enable companies to utilise Northern Ireland's renewable energy potential in the most efficient manner.