

Response ID ANON-YNXX-Z5N1-5

Submitted on 2011-03-10 08:22:55.120174

What is your name?

Name: Gavin King-Smith

What is your email address?

Email: administrator@microhydroassociation.co.uk

What is your organisation?

Organisation: Micro Hydro Association

Q1. The Working Groups made clear MCS should continue to be responsible for certification in the microgeneration sector. Do you agree?

Your response: NO for Micro Hydro technology. The MCS approach is inappropriate for micro hydro generation and the micro hydro industry at its present stage. This is not a mass production technology - hundreds or at most thousands of sites, not millions. The "standards" that have emerged from the working group which I and a number of others with strong credentials in the micro hydro industry attempted to influence, and finally disowned, are neither standards nor workable for micro hydro. A more appropriate approach for certification for FIT eligibility and for increasing consumer confidence would be to introduce a design/site inspection process resulting in certification of individual schemes as to being eligible for the FIT. The way to improve quality of supply and consumer knowledge about supply options would be to encourage user/industry groups to monitor the effectiveness and quality of supply, installation and operation of micro hydro schemes. I also submitted comments to the working groups on stage 1 of the consultation. Please take these into consideration (attached)

Upload file:

https://econsultation.decc.gov.uk/decc-policy/microgen_strategy/consultation/download_file?squid=question.2010-12-07.5906151220-filesubquestion&user=ANON-YNXX-

Q2. Do you agree that MCS governance should be improved and that it should move towards becoming a free-standing company? Please provide evidence to support your views.

Your response: No comment

Upload file: Not Answered

Q3. How can MCS be put on a sustainable financial footing without compromising its independence and without the use of public funds?

Your response: No comment

Upload file: Not Answered

Q4. Do you agree that MCS should be extended to support technology limits over the strict microgeneration limit (<50kWe for electricity and <45kWth for heat)?

Your response: I think increasing regulation is more appropriate for larger capacity schemes than for smaller owing to the greater need to avoid risks of poor investment, environmental damage etc. These risks are on a much smaller scale and tend to relate to individual landowners for micro hydro schemes.

Upload file: Not Answered

Q5. What size, in terms of the upper limit for each technology, should MCS cover? Please provide evidence to support your views.

Your response: Irrelevant for Micro Hydro

Upload file: Not Answered

Q6. What type of insurance schemes should the industry consider?

Your response: No comment

Upload file: Not Answered

Q7. What are the specific concerns about the governance, transparency and flexibility of SAP?

Your response: Irrelevant for Micro Hydro

Upload file: Not Answered

Q8. Do you agree that once RDSAP is aligned with SAP 2009 in 2011 it will be effective in assessing microgeneration technologies? If not, please identify other areas of concern that should be considered as part of future reviews?

Your response: Irrelevant for Micro Hydro

Upload file: Not Answered

Q9. How do we ensure that sector skills are in-step with sector growth? This will be about up-skilling of the existing workforce as well as modified apprentice training – how will this be cascaded to companies and individuals most effectively?

Your response: review availability of training for hydro engineering supply chain and establish new courses (necessary for training hydro installers and for certification bodies to be in a position to take on hydro scheme inspections)

Upload file: Not Answered

Q10. What role could manufacturers play in training provision?

Your response: For Micro hydro, the critical need is for experienced hydro designers and installers to train the less experienced on the job.

Upload file: Not Answered

Q11. How can the marketing, and accessibility to, training reach smaller companies and individuals?

Your response: no comment

Upload file: Not Answered

Q12. Are there enough people who can be trained – given the on-going high uptake of solar PV, for example? How can we ensure that training gives sufficient weight to repair and maintenance?

Your response: no comment

Upload file: Not Answered

Q13. How can we ensure that we capture the training needs of those installing these technologies in the commercial sector?

Your response: no comment

Upload file: Not Answered

Q14. How can we ensure that design advice capacity is in place to meet demand projections?

Your response: For Micro hydro, the critical need is for experienced hydro designers and installers to train the less experienced on the job.

Upload file: Not Answered

Q15. What are the interim solutions to ensure householders are given the right advice now?

Your response: Advice on micro hydro should take account of its integration where relevant with other technologies and approaches to energy conservation - Organisations such as the Energy Savings Trust should take account of micro hydro potential where relevant and obtain advice from hydro installers as to the specific energy generation contribution from hydro, balancing this with the contribution obtainable from other resources.

Upload file: Not Answered

Q16. How should this approach be modified for the commercial sector?

Your response:

Upload file: Not Answered

Q17. What further steps should be taken to ensure that appropriate training and knowledge-sharing reaches all those working on wider energy, construction and environmental issues?

Your response:

Upload file: Not Answered

Q18. What sort of market intelligence should industry and Government be collecting?

Your response:

Upload file: Not Answered

Q19. How should this market intelligence be collected using existing networks and relationships such as trade bodies, MCS, Certification Bodies?

Your response:

Upload file: Not Answered

Q20. Do you agree that industry working with Government should update route maps and use them as a tool to support technology development?

Your response:

Upload file: Not Answered

Q21. What could Government and other parties do to ensure that the grid is ready to cope with impacts of an increase in microgeneration technologies, in particular heat pumps?

Your response:

Upload file: Not Answered

Q22. How can DNOs and the microgeneration industry work better together so that both sectors understand the relevant technologies, their impacts, and how to manage these impacts in a cost effective manner?

Your response: DNOs should be required to publish details of existing infrastructure capacity and plans for upgrade to assist the rapid introduction of microgeneration. DNO's could initiate forums for discussion of infrastructure capacity with potential hydro and other generators to ensure appropriate development and upgrading of lines. More generally consideration should be given to effective means of establishing and maintaining hydropower schemes: a) roles of electricity industry players (consider bringing hydropower under the umbrella of the DNOs as part of the UK power infrastructure with a requirement on the DNOs to identify and implement schemes in their regions – financial support for infrastructure investments) b) options for landowners (establish wayleaves if schemes involve use of their land for water abstraction, pipelines or cables) Much of the potential microhydropower resource in Scotland cannot be supported by the limited capacity power lines that serve rural locations.

Upload file: Not Answered

Q23. How can heat pumps be rolled out at scale and integrated in to a low carbon electricity system - what are the best ways of achieving this?

Your response:

Upload file: Not Answered

Q24. How can the controls and microgeneration industry work closer together to ensure that a systems approach becomes a reality?

Your response:

Upload file: Not Answered

Q25. How should the industry, other stakeholders and Government tackle the need to raise consumer awareness of how heating systems can work more effectively?

Your response:

Upload file: Not Answered

Q26. As a means of future proofing buildings for microgeneration technologies, how can heating solutions that provide for hot water storage be encouraged?

Your response:

Upload file: Not Answered

Q27. What should the microgeneration industry do to take forward the development of storage technology?

Your response:

Upload file: Not Answered

Q28. What more should the industry be doing to promote Flue Gas Recovery Systems to increase take up?

Your response:

Upload file: Not Answered

Q29. How can you help Government disseminate the results from best practice and exemplar projects?

Your response: I can offer information being collected by the Micro Hydro Association on current and potential micro hydro schemes and access to the installers, turbine suppliers, and generators involved. The Micro Hydro Association has over 100 members: 70+ generators/potential generators, and 30+ resources.

Upload file: Not Answered

Q30. Do you agree that MCS is the best route for providing a directory of installation companies? If not what alternative do you suggest?

Your response: NoThe MCS is inappropriate for Micro Hydro and in any case directories of suppliers, industry publications/websites, and associations in the private sector can supply such information as with most technologies.

Upload file: Not Answered

Q31. Do you agree that installation companies removed from the MCS scheme for malpractice should be clearly reflected in the directory of installation companies? Please provide evidence to support your answer?

Your response:

Upload file: Not Answered

Q32. What is the best way of making sure that microgeneration and Green Deal advice provision work together?

Your response:

Upload file: Not Answered

Q33. What role should MCS installation companies play in providing objective advice on which technology to install?

Your response: Micro Hydro scheme designers should always provide objective advice on the appropriate type of hydro turbine to use for a given site which has access to water resources - this can be verified under a scheme design/site certification process but would not be guaranteed by MCS.

Upload file: Not Answered

Q34. Do you agree trade bodies should collate information on the advice their respective members are providing? If not what alternative do you suggest?

Your response: yes

Upload file: Not Answered

Q35. Do you agree that such information sheets would be valuable? Please provide evidence to support your view.

Your response:

Upload file: Not Answered

Q36. Who do you think is best placed to write and disseminate them? Please provide evidence to support your view.

Your response:

Upload file: Not Answered

Q37. What aspects of the Green Deal Framework will need to closely align with the microgeneration framework set out in this consultation document?

Your response:

Upload file: Not Answered

Q38. Can you illustrate with examples the potential opportunity that the 'community energy' sector presents?

Your response: Water resources suitable for hydro schemes present an ideal opportunity to provide community benefit from what can be considered a community (or even national) resource. In many cases many land owners could be affected by one scheme as with the electricity grid, telephone network, public water supply, etc. The return from investing in a hydro scheme should accrue to those who have invested, and some compensation for wayleaves may in addition be appropriate for affected land owners.(personal view - not to be represented as a Micro Hydro Association members' view)

Upload file: Not Answered

Q39. What do you feel are the non financial barriers to developing community energy?

Your response: For micro hydro: parochialism of landowners (personal view - not to be represented as a Micro Hydro Association members' view)

Upload file: Not Answered