13/11/2013

Dear Sir/Madam,

Thank you for the opportunity to comment upon the consultation for the implementation of directive 2012/27/EU.

The main Articles that we would like to comment upon are articles 7, 14 & 16 as these pertain particularly to HE CHP.

In this regards there are a number of issues that should be taken into account in the transposition of the Directive.

Deployment of HECHP in both CHP and DHC applications has been hampered to date by a number of factors, including access to cost effective fuel, access to finance and an uncertain regulatory regime that has been developed in an ‘on the hoof’ manner. We very much welcome the consolidation of the various directives associated with the technology and urge its quick transposition into national legislation.

We note that there is an automatic transposition of the replacement for Directive 2004/8/EC this is a welcome development as it provides longer term assurances for project planners on the efficiency levels that must be achieved.

In regards to article 7 we believe that the 1.5% targets should be exceeded at this moment in time to provide for the achievement of the targeted energy position under 2009/28/EC, the base is so low at the moment that it requires dramatic intervention across all policies in order to avoid the missing of the 2020 targets.

In relation to article 14, at the moment the base for HECHP is so low that there are not any meaningful datasets available from the industry’s perspective, we note paragraph 11 and would urge that the Primary Energy Saving in conjunction with the need for a useful heat offtake is the future basis for supports.
In relation to article 15, while the contention is that this is primarily a matter for the TSO/DSO it should be borne in mind that the current dispatch hierarchy was based upon 2009/28/EC, the priority dispatch position in 2012/27/EU seems to give particular priority to HECHP in order to ensure continuity in heat supply, this is an important distinction, insofar as the current position provides priority access for wind. We would welcome the clarification of this position and would urge its quick transposition into policy in order to ensure continuity in heat supply.

Regards,

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