

Edina Limited's Response to CER/11/189

James,

I am very concerned by the proposed 'Approach 2', whereby the CER may not consider recycled heat useful. This would effectively exclude AD plants from obtaining REFIT III feed in tariff rates of 15 c/kWhr for the electricity they produce from their CHP plants.

This would jeopardize this whole Anaerobic Digestion industry in Ireland, as the alternative rate if they do not achieve 'high efficiency' status is only 7.8 cents. If their income is halved. I don't think an Irish business can remain viable if its income is halved with no change to operating costs.

This will kill off an industry which is just about to take off in Ireland due to this feed in tariff. This type of plant is proven successful in other European countries.

Also, the conditions to be met are very onerous. There will be a lot of work involved, and significant expense in fitting approved meters where they may not all be considered 'standard' for a CHP plant. I.e. steam feedwater heat meters.

I can see a lot of operators not bothering with this process unless they are exporting power to the grid (not likely) or they wish to qualify for the 'High Efficiency biogas CHP' refit tariff (could be ruled out by 'approach 2').

I take this opportunity to submit a strong objection to 'approach 2'. This approach will prevent the roll out on CHP plants running on biogas all over the country.

Regards,

Alan Smyth
Project Manager
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