

## GREEN HIGHLAND RENEWABLES

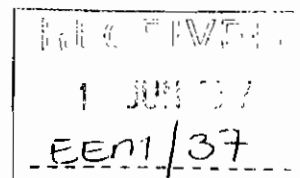
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Energy Efficiency Unit  
Scottish Executive  
Enterprise, Transport and Lifelong Learning Department  
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Dear Sir or Madam

### **Energy Efficiency & Microgeneration Strategy Response to Draft for Consultation**

We fully support the objectives of the Energy Efficiency and Microgeneration Strategy, and congratulate the Scottish Executive on their proactive approach to these important matters.

We endorse the overall approach of the strategy, particularly its wholistic nature which, as we understand it, embraces:

- reducing energy use;
- increasing renewable energy supply;
- monitoring improvements; and
- educating the community.

With regard to specific issues raised in the strategy we make the following comments.

- The concept of a one-stop-shop for information is strongly encouraged. There is already a huge multitude of organizations – government, industry and community – at work in this field, which can be very confusing.
- Energy efficiency targets, while important, should remain just that – targets – which encourage people to aim high but accept they may not reach the goal. When targets become mandatory they can lead to tokenism and statistic-fiddling at the expense of actual improvement. Financial and planning incentives to encourage uptake of energy efficiency amongst the general public is considered preferable. Mandatory requirements for the uptake of renewables do exist for the energy industry as a whole which are considered appropriate.
- Micro-generation should only be encouraged with proper consideration of its applicability to an individual site and user. Mini-wind turbines might look good, but they don't necessarily produce enough energy to justify their cost. And most renewable energy systems require some interaction by the users, which is problematic unless they are educated about and committed to the base principle. It will not be applicable to all developments.
- Ongoing actions to reduce energy consumption at the user level should be strongly encouraged. This includes, amongst many other things, the installation of Smart meters, making available ultra-high efficiency appliances, and retrofitting insulation for example.

Requiring energy performance certificates is an important part of this, including all electrical equipment e.g. TV's and set-top boxes, right through to buildings.

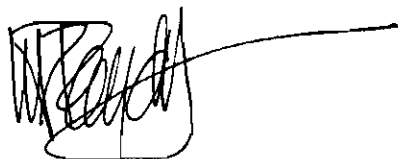
- Schools are good examples of public buildings where renewable energy systems can generally be readily installed, with the added benefit of changing attitudes for future generations. Expansion of such systems is encouraged.
- The development of a separate strategy for renewable heat is questioned. Heat and electricity are just different forms of energy, and for many renewable technologies you cant make one without at least some use or generation potential for the other, most obviously demonstrated by combined heat-power systems. Reducing consumption through building construction, such as passive solar design, insulation, air tightness and thermal mass, are applicable to both. Therefore a common, or at least closely coordinated, strategy is considered preferable.

With regard to the development of micro-generation capacity we make the following comments.

- The provision of more detailed nationwide base information is highly desirable, as it will allow ready identification of what renewable energy technologies are appropriate for any given site. Obtaining this information for an individual site currently can be very expensive. Where a site or region is identified as having significant potential for a specific technology, landowners should be actively encouraged and supported to pursue installation of the relevant system.
- In terms of the mix of renewable energy technologies, the development of decentralized energy, district heating and combined heat-power systems that supply an area or group of users, as opposed to a single building or user, should be encouraged as they tend to allow greater efficiencies of scale. Such systems are common in many European countries.
- Changes to the planning processes and permitted development rights to simplify and expedite approvals are strongly encouraged. Information about the planning process should be readily available.
- The ongoing provision of grant funding or tax breaks is essential to the development of renewable energy at this time. Streamlining and expanding the grant approval and payment process is strongly encouraged.
- Streamlining the process for obtaining and trading Renewable Obligation Certificates (ROC'S) is strongly encouraged, especially for small-scale producers.
- Improving grid infrastructure and expediting the grid connection process is essential to allow many potential suppliers access to the market.

We look forward to the development of this strategy and renewable energy policy in Scotland generally, and would be interested in opportunities to actively participate further in this process.

Yours sincerely



W. Ronald Boydell