

Date: 16 January 2012
Consultation: Renewables Obligation (Amendment) Order (Northern Ireland) 2012

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide around 36,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org.

Background

In October 2011 the Department of Enterprise, Trade and Investment issued a draft of proposed changes to the Northern Ireland Renewables Obligation upon which it wished to consult. We are interested in this particular consultation as it may have relevance for the work of our member housing associations.

General Comments

NIFHA welcomes the opportunity to comment on this consultation as housing associations in Northern Ireland have been advocating a step change in environmental sustainability through government action. Our members are in favour of actions which will support the transition to a low carbon economy, create employment, reduce fuel poverty and tackle social inequalities.

Specific Comments

Having reviewed the consultation document and discussed these amendments with relevant member organisations we have no major concerns about the proposed changes. However, we would like to highlight the following points in relation to your list of questions:

Q3 *NIROCs for Solar PV*

We agree with the proposal to increase the Renewables Obligation Certificate level for Solar PV installations up to 10kW from the current 4 NIROCs to 5 NIROCS per MWh.

Q11 *Feed-in-Tariffs*

We are conscious of the current situation in Great Britain (GB) in relation to Feed-in Tariffs (FIT) and feel more clarification would be required before the introduction of a similar mechanism for Northern Ireland.

From our members perspective the issue is not the mechanism itself rather how it would work in practice. Given the experience of our colleague organisations in GB we believe greater certainty will be essential to facilitate forward planning and encourage support for the uptake of Feed-in-Tariffs.

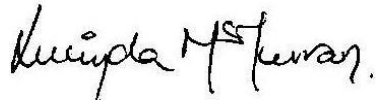
As Northern Ireland is already subject to high levels of fuel poverty it is important that the introduction of FITs does not have a negative impact on the public through increased electricity costs across the board.

Finally, as these changes are part of an overall review of the Renewables Obligation we would recommend they are applied in a manner which aligns with the UK-wide approach but is sufficiently flexible for the Northern Ireland context.

Conclusion

I am pleased to submit this response on behalf of NIFHA and trust you will find our comments helpful.

Submitted on behalf of NIFHA by:

A handwritten signature in black ink, appearing to read 'Lucinda McMurrin'.

Lucinda McMurrin
Corporate Services Manager