

To Whom it may concern,

I work for FCC Environment in the UK, we have a fleet of 5 Energy from Waste plants with more in the pipeline. This response represents the views of the fleet of five plants here in the UK.

1. Do you agree with our proposal to de-scope DUoS from the Access SCR and take it forward under a dedicated SCR with revised timescales?
 - a. Fundamentally, yes we agree. The Access SCR has already been running for 3 years so it needs to be delivered, and, better to let that take effect and inform phase 2.
2. What are your views on the timescales for implementation of DUoS reform? How does this interact with wider market developments and what do we need to take into account?
 - a. Given the level of change we are going to see in the energy market over the coming decade with far higher levels of small renewable generation and electrification of transport with all the associated battery applications it might be prudent to allow this to mature for longer before undertaking DUoS reform, if the SCR takes 3 years then maybe starting post 2026 for a 2030 implementation would avoid completing a SCR and implementing in 2026 then finding ourselves ready to launch a further SCR later in the decade.
3. What areas of interactions of DUoS with wider developments in policy / industry do we need to consider in our review?
 - a. What about CCUS? The future carbon emission limits will impact on the Distribution systems as generators might have to seize operation/relocate/change running profiles/change export capacities.
4. Have we considered all the impacts of a phased approach to delivering the original scope Access SCR?
 - a. There appears to have been suitable consideration for impacts.
5. Do you have any views on our proposal to retain the scope and governance arrangements of the original Access SCR?
 - a. It's comprehensive and proven so we think it prudent to stick to that.
6. Do you have any other information relevant to the subject matter of this consultation that we should consider?
 - a. Not at this point.

Kind Regards,

Tony Cox