

10 June 2014, Brussels

Dear Thierry & Team,

The European Turbine Network would like to thank you all for your efforts to date in progressing the update of the LCP BREF document. In undertaking such a task it is inevitable that points of contention will arise between the major stakeholders. As noted previously, it is ETN's preference that these are resolved via the completion of a second draft document and review of that via the Technical Working Group ahead of completing the final version. However, that preference to one side, we would like to highlight some of our other concerns – as contained in our letter to the EIPPCB on 25/09/2013. In order to make the format more amenable to inclusion in the interim TWG meeting these are outlined in the attached presentation, and can be summarised as:

1. We share EU Turbines concern that some data from Gas Turbine plant has been excluded from the data assessment. It is not clear how the data analysis has been completed and on what grounds BAT candidates have been screened out.
2. Sustaining the AEL performance levels in the BAT Conclusions will either not be viable or will drive in significant capital cost increases relative to the emissions benefits.
3. It remains our belief that there is a lack of consideration of operating modes (base load, mid merit, frequent start up and shut down etc.). This will impact an asset's ability to achieve or afford the proposed performance.
4. There is the strong potential that the ability of many gas turbine based power plant (both new and existing) to offer the start-up and shut-down flexibility required to support the deployment of intermittent renewable generation will be compromised.

In addition to the points from our earlier letter we also have two additional concerns

5. ETN is concerned that BAT for liquid fuel fired turbines is beyond that which is truly "available" at this point in time.
6. Whilst recognising the intent of the document to facilitate the efficient use of resources, we believe the BAT conclusions on energy efficiency are inappropriate.

We look forward to the informal meeting in Seville in the coming weeks where ETN will be represented by Neil Dawson, National Grid.

Christer Björkqvist
Managing Director
European Turbine Network (ETN)