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ABO Wind N.I. Ltd – Response to SONI consultation dated 8 March 2013 “*Generator Connection Process – Allocation of Transmission FAQ in N Ireland & ITC Methodology to determine FAQ’s*”

Dear Gareth,

In response to this further consultation paper ABO Wind supports most of the comments provided in the NIRIG response with the following additional comments to those questions raised in section 3.2 *Entry to the NI generation listing* & 3.3 *Order in which applications are assessed in the ITC model*;

- ABO Wind are strongly against any preferential treatment (queue jumping) for offshore generators in allocation of firm access. We believe that comparable levels of pre-development investment are needed on a per MW basis. Substantial risks are taken in both cases and there is no valid argument for favouring offshore over onshore. We would like to stress that this is a matter of fundamental importance to ABO and any such discrimination could be subject to legal challenge.
- ABO Wind agree in principle with the proposed decision to use connection application date for ordering applications in the ITC model, however there was a reasonable expectation in industry that planning permission date was going to be used. This expectation was built up

from interactions between developers and system operators over the past 10 years and was proposed again in the 2011 consultation paper. We therefore propose that planning permission date is used up to a defined date, possibly the issuing of this consultation paper, and connection application date is used from that point forward.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Joe Jellie'.

Joe Jellie
ABO Wind N.I Ltd