



Top Floor Suite
182 Lisburn Road
Belfast
Co Antrim
BT9 6AL

Connection Design
Northern Ireland Electricity Networks Ltd
120 Malone Road
Belfast
BT9 5HT

By Email

ConnectionDesign@NIENetworks.co.uk

Connections@soni.ltd.uk

RE: Consultation on NIE Networks Providing Distribution Generation Offers with Non-Firm Market Access.

Dear Sir or Madam,

We welcome the opportunity to engage with NIE Networks and SONI on Consultation on NIE Networks Providing Distribution Generation Offers with Non-Firm Market Access and we look forward to further opportunities to engage in the future. This is a very important consultation to ensure there is an ongoing process for generators in Northern Ireland to receive connection offers from NIE. Without a robust generator connection process there will be a detrimental impact on the security of supply, the competitiveness of the electricity market and ability of Northern Ireland to decarbonise its energy sector.

About Indaver

Indaver provides waste treatment services to a significant municipal, commercial and industrial customer base and owns and operates a 17MW hybrid renewable Energy from Waste (EfW) generator in Duleek, Co. Meath. This facility treats waste that cannot be prevented, reused or recycled. The company is also proposing to develop EfW facilities of a similar scale across Ireland and the UK in Aberdeen, Belfast, and Cork and is exploring other opportunities in the UK.

Indaver takes the view that whilst waste reduction and elimination must be prioritised, unavoidable wastes that cannot be recycled in a sustainable manner can be safely and effectively treated by the EfW process.



This form of sustainable waste technology has the added benefit of producing electricity and heat whilst ensuring that such unavoidable wastes are transformed into useful and valuable resources which can thereafter contribute to a circular bio-economy.

Indaver's EfW facilities deliver renewable generation which is fully synchronised to the grid and therefore bring additional benefits to the system which is struggling to accommodate non-synchronous and variable renewable generation. Indaver's existing facility in Meath is contracted to provide 8 system services under the DS3 programme (POR, SOR, TOR1, TOR2, RRS, RM1, RM3, RM8).

We fully support the Northern Ireland Renewable Industry Group (NIRIG) position and the following preferred approach:

- Approach 2A – with a limit of 400 MW.

This interim cap balances the need of providing new generation with connection offers and having an acceptable impact on existing generation. The cap should be reviewed when new Northern Ireland RES-E energy targets are agreed, every two years or when the limit is reached, whichever comes first.

Yours sincerely,

A handwritten signature in blue ink that reads "Jackie Keaney". The signature is written in a cursive, flowing style.

Jackie Keaney
Commercial Director