

SONI Ltd
Castlereagh House
12 Manse Road
Belfast
BT6 9RT

ABO Wind NI Ltd
Adelaide House
Hawthorn Business Centre
Falcon Road
Belfast
Northern Ireland
BT12 6SJ
Phone: + 44 (0) 28 9038 7068

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By email: connections@soni.ltd.uk

Dear Sirs

Alternative Connection Application and Offer Process Proposal Consultation Paper

ABO Wind N.I. Ltd is a subsidiary of the German-based ABO Wind AG, one of Europe's most experienced wind energy developers. The company was founded in 1996 and has over 300 employees in Germany, France, Spain, Scotland, Ireland and Argentina, with interests in Portugal, Belgium and Bulgaria. ABO Wind has been successful in developing, constructing and maintaining wind farms with over 1000 MW of rated capacity in Europe. ABO Wind has commissioned 7.5MW in Scotland, 70MW in the Republic of Ireland and currently has 128MW at various stages of the planning process in Northern Ireland.

ABO whole heartedly supports the submission made by NIRIG on behalf of the industry and has some serious concerns around the proposals as set out in the consultation paper. Until the recent determination by the Utility Regulator dated 30th July and subsequent influx of grid applications, the Industry had been relatively well served by a grid connection application process with clear milestones and certain timelines. Whilst it is understood that the consultation paper has been issued in an attempt to deal with the large volume of applications in a timely and efficient manner, we strongly believe that the requirement for planning permission in advance of grid connection application should be reintroduced immediately. Urgent reinstatement of this milestone would flush out the high number of speculative applications currently clogging up the system. This would also avoid the pitfall of capacity hoarding arising as consequence of the proposed batching process later on.

We are also concerned about the timing of introduction of a new batch process. The Renewables Obligation Closure Order (Northern Ireland) 2016 was passed by the Northern Ireland Assembly on 15th March and confirms closure of the NIRO to large scale onshore wind from 1 April 2016 with exceptions in the form of grace periods for eligible projects. There is no further support mechanism currently in place for large scale generation beyond the NIRO and the future of small scale generation is still under consideration. It may take a number of years to fully design and

implement any future support scheme. In line with the NIRIG response, we therefore believe that NIE and SONI should take this opportunity to make licence changes to facilitate not only the reintroduction of the planning permission milestone but any other such changes required to create a fit for purpose system. It would also be prudent to seek amendments to the Utility Regulators licence so as it can have a greater role in reviewing and approving connection policy as required ensuring modifications to licence requirements can be made quickly and easily, avoiding the need for time consuming legislative changes.

Whilst the above changes are ongoing, we would strongly request that interim measures are employed to ensure grid offers are not unduly delayed. We welcome the proposal at Question 11 that spare cluster capacity should be allocated as a priority outside of the batch process. This should also apply to areas where there is transmission capacity available. FAQ should however continue to be allocated on basis of the current date-order rules for allocating firm capacity. This would allow efficient allocation of what resource is currently available to projects that have the potential to be realised quickly whilst further planning is ongoing in parallel. These projects could make a sizeable contribution to renewable energy targets also.

It is important to take account of the strategic EU 2030 targets and DETI's 2050 vision which clearly point to the importance of increased decarbonisation of the electricity system. The expected benefits of reaching the 40% target by 2020 include reductions in the wholesale cost of electricity, increased security of supply and progress towards our other sustainable development policies. Renewable energy, as part of a balanced mix, has a vital role to play in achieving a secure, affordable and sustainable energy supply as well as boosting employment and growth as part of a thriving low-carbon economy. The batch process does not sit squarely with these targets.

In conclusion, we are concerned about the potential impact on the viability of renewable energy in NI the proposed arrangements would have. Reinstatement of the requirement for planning permission prior to grid application should be a priority and the interim measures outlined above employed whilst the necessary licence changes are ongoing. It is respectfully requested that our concerns are taken on board and both SONI and NIE continue to engage meaningfully with industry on the matter.

Yours sincerely,



Tamasin Fraser
Head of Development
ABO Wind NI Ltd