



04<sup>th</sup> April 2016

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[Sent by email to [connections@soni.ltd.uk](mailto:connections@soni.ltd.uk) ]

**Re: Alternative Connection Application and Offer Process Proposal**

Dear Sirs,

We, DW Consultancy Ltd (DWC), are wind farm project developers operating in both Northern Ireland and the Republic of Ireland. We have been active in the Northern Irish wind industry for over ten years, and we have developed a large portfolio of operational (20MW), consented (c.140MW+), and proposed (c.85MW) onshore wind farm projects. We welcome the opportunity to respond to SONI and NIE's consultation paper titled '*Alternative Connection Application and Offer Process Proposal*'.

DWC support the detailed response provided by the Northern Ireland Renewable Industry Group to this consultation. Included below are DWC's principal comments on the proposals in the consultation paper.

**We are extremely concerned** at the proposals to introduce a batch process. As developers of wind farms in the Republic of Ireland we have had wind farm projects that were processed through Gates 1, 2 and 3. The current batch processing proposals from SONI & NIE have a lot of similarities when compared to the Gate process used in the Republic of Ireland. However there are two critical differences; firstly, the majority of projects that were processed through the Gate system already had planning permission or the capacity relocation rules allowed the capacity to be relocated locally to a site with planning. Secondly, the costs of shared assets are underwritten by the consumer, so that a project not proceeding is less likely to be impact negatively on other projects in the group. For these two reasons the Gate system has been reasonably successful in the goal of issuing connection offers that resulted in renewable generators connecting to the system. In our opinion the batch processing proposals will not be a success as it will include too many relatively speculative applications and all the shared costs will not be underwritten by the consumer.

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**DW CONSULTANCY LTD**

The batch process is also being introduced at a time when the renewable industry has never had as much uncertainty on how renewable projects will be funded in the future. However, it is an opportunity to develop the necessary connection policies to address the increasing complexities of connecting generators to an increasingly saturated system. For the reasons outlined above we strongly do not believe that the proposed batch system is the correct approach at this time.

DWC do believe that the reinstatement of the requirement for planning permission as a prerequisite to apply for a grid connection is the correct approach. We appreciate that that this will likely require legislative changes of NIE, SONI and possibly the Regulators Licence. However, it has not been confirmed by NIE or SONI in this consultation or in the workshop that the proposed batch processing system will not also require legislative change to ensure it is a robust policy that will not fail if disputed.

DWC supports that interim measures proposed in the consultation paper. These measures will allow some connection offers to be issued in the period until the necessary changes to the connection offer process can be agreed and implemented.

Please do not hesitate in contacting us if you have any queries or wish to discuss this matter further.

Yours Sincerely,

**Barry O'Kane, B.Eng, C.Eng, MIEI,  
Chartered Engineer  
On Behalf of: DW Consultancy Ltd.**