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05th April, 2016

Reference: Alternative Connection and Application and Offer Process Consultation Paper 4th March 2016

To whom it may concern,

I refer to the consultation on the Alternative Connection and Application and Offer Process Consultation Paper issued on the 4th March 2016

Gaelectric is part of the wider Gaelectric Group ("Gaelectric Group") of companies. Gaelectric Group is a leading independent renewable energy developer operating within Northern Ireland, the Republic of Ireland and North America. Founded in 2004, Gaelectric is developing a range of wind, solar, energy storage and biomass projects, with 174MW of capacity currently connected to the grid. To date, Gaelectric has a wind energy portfolio of 8 projects with planning consent in Northern Ireland, with its first wind farm becoming operational in May 2011. Operational projects include Carn Hill, Co Antrim (13.8MW), Dunbeg, Co. Londonderry (42MW) and Monnaboy Co. Londonderry (12MW).

Gaelectric have decided not to answer the questions within the consultation as we believe them to be leading rather than a factual understanding of what industry should be addressing. Gaelectric will however respond with its concerns over the content within the consultation.

Gaelectric appreciate recent developments within the industry have been turbulent and believe this has been aided by the lack of common goals between generators and the System Operators. Gaelectric believes the System Operators have only been reactionary and time-consuming in the delivery of connection offers to generators.

Gaelectric believes that it is the responsibility of the System Operators to deliver connection offers that allow the timely delivery of generation. NIE and SONI should be using the current system to allow generation to be connected in a timely manner and deliver any efficiencies to the Northern Ireland customer in its capacity as the owners and operators. Reserve on the system should be utilized to its maximum efficiency thus driving a greater economy.

Generators should be allowed to over-install renewable generation on their site above the generator MEC. This includes sites with the same technology and hybrid generation sites. We do not believe this issue should have been included in this consultation and request that the System Operators make a separate decision on this issue.
Connection applications and modification applications which do not increase MEC are, as a matter of law, fundamentally different and accordingly must be treated differently. Over-installing capacity is an efficient use of the system and connection assets and will allow additional renewable energy to be delivered to the consumer, thus contribute to the 2020 renewable targets. We understand that NIE have some concerns around the need for fault level. Where fault level and other studies show the connection to be grid code compliant, the generator should not have its business development to be hindered by such self prevaricate and draconian understandings . Export capacity is contracted at its maximum and generators have the right to manage this within their own system.

Managed connections - albeit Gaelectric agree with the concept it should not be to the detriment of another contracted generator exercising their right to maximise their potential. Managed connections should be across the whole sector and not only for small wind to access the system in a shortened time frame. Managed connections should also only be short term and not a method of NIE negating to address their responsibilities to uprate the system to accommodate reasonable use.

Gaelectric would like to see a proactive resolution to facilitate the overwhelming desire by generators to deliver efficiencies in their businesses. The System Operators should be seeking to support business in Northern Ireland to develop and deliver and not to hinder by composing obstacles that are not required to be there.

Gaelectric would like to thank you for taking the time to read our response and look forward to a positive outcome on the over installation and Co Location/Hybrid technologies issue.

Regards

Kevin McKeown

Head of Power Systems
Gaelectric