



SONI & NIE  
Northern Ireland  
To: connections@soni.ltd.uk

Dear Sirs

18 March 2016

### **Alternative Connection Application and Offer Process Proposal – Consultation**

Further to your request for comments on the above document, I am writing to reiterate the position I have previously set out to you – namely that your process needs to reflect commercial reality and therefore prioritise the most time-critical connection applications.

You get part of the way to this conclusion by, for example, accepting – on page 23 – that a connection process taking years would be unacceptable. Yet the “elephant in that same time-sensitive room”, which you seem unwilling to acknowledge, is the ending of the NIROC.

For many projects, the NIROC is not a “nice to have”, boosting a good return into a Klondike. In an era of low oil (and SEM) prices (and potentially market failure in the PPA market), it is a necessity; without ROCs, many of the projects in your application queue are unviable.

Following the recent confirmation of the closure of onshore wind to the NIROC, then, your duty of care to grid applicants appears to be best discharged by prioritising connections of non-wind projects.

This principle of expedience in the interest of NI consumers and manufacturers applies across your consultation questions and additionally translates into our support of: (i) connection type differentiation (Q5 – here, we believe that “simpler” connections [e.g. zero export or change in technology] should be prioritised over deep reinforcement projects); and (ii) fast-tracking (Q14 – here, we support prioritising projects where there is existing capacity/deep reinforcement is not necessary) – provided that such policy choices should be subordinated to the principle of prioritising time (ROC) critical projects.

We would also point out that your consultation process is taking longer than flagged and, given the time-critical impact on people’s livelihoods, would like an explanation as to what has been achieved by SONI and NIE in the 7 month period since the predictable influx of applications.

I would be happy to further explain our position, should you wish; in the interest of transparency, please be advised that my key project at this point is the development of a zero-export solar farm, which would provide low cost energy to a key NI manufacturing employer.

Yours sincerely

Iain Lees  
cc John Mills, DETI

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