

Dear Sirs

Simple Power is responding with respect to small scale generation connections. We believe the consultation document focuses mostly on large scale generation so we have not attempted to answer the specific questions but have adopted a different approach to our response as follows and it is mostly targeted at NIE.

We have looked at the latest DETI Consultation and have attempted to interpret what it means for small scale generation and its likely impact on the proposed process for handling renewable connections applications.

DETI have tabled 3 possibilities for closure, 30 June 16, 30 Sept. 16, 31 March 17.

It seems 31 March 17 is a non-starter because of the uncertainties and threats it would introduce.

30 June 16 closure (seems to have little DECC/NIROC risk) – There may be some projects submitted since the lifting of the planning requirement, which obviously do not meet the Sept 15 eligibility criteria, but would be simple connections (there is capacity and a very straightforward connection arrangement). To qualify for accreditation would these applications have (by 30 June) to have planning permission, proof of tenure, an accepted connection offer plus an indication from NIE that they had a realistic expectation (at their application date) of being connected by 30 June 16 ? This would have bought them a grace period to get connected by 1 July 17 ? It seems unlikely that NIE could meet these timescales/guarantees for any project.

There might be a small number of projects that had planning, tenure and a connection offer before 30 Sept. 15 but for some reason were not in a position to accept it, these might be able to take advantage of this extension.

30 Sept. 16 closure (seems to have some DECC/NIROC risk) – Applying the same logic as for 30 June closure there are likely to be projects (simple connection arrangements) that could meet a 30 Sept. 16 deadline (with grace period) but NIE would need to be identifying these now and issuing quotations quickly.

If there was a Managed Connections regime with connection offers being made (before 30 Sept) these projects could qualify. This would require a leap of faith with NIE issuing offers on the condition that the Managed Connections regime could be established before 30 Sept. 17 (end of the grace period). The timescales again would only work for simple connection arrangements and NIE would have to identify these quickly from those applications held in abeyance. Developers would have to commit some money to develop the offer thro pre-construction but no final commitment of money until there was confirmation of the Managed Connection arrangements.

In all of this NIE should take as sympathetic a view as possible to refund of connection fees to developers who really will have very little information available to help them make decisions.

Possible Actions for NIE/SONI (assuming our interpretation of the DETI proposals is correct) – (these assume an overall objective of maximising the amount of generation that can connect and not simply preserving queue positions)

-As a matter of urgency NIE should ask SONI for locations where there is no transmission capacity issue. They should then take back the small scale applications from these locations and do a quick trawl to see if any of these would be worth pursuing (against whatever DETI closure date is established).

-If significant large scale applications withdraw from the batch process NIE should take back all the small applications and again look for the ones that might work.

-NIE should consider issuing 'conditional' quotations for Managed Connections, again trawling thro the list for the most likely to work.

The above possibilities probably assume a Sept. 16 closure date which might not be acceptable given the DECC/NIROC risks but if DECC could be persuaded that it is only 6 months, and the current arrangements should apply, it might be possible.

Regards
Philip Rainey

Chief Executive Officer



Arthur House, 41 Arthur Street, Belfast, BT1 4GB

Tel: +44 (0) 28 9024 1199

www.simplepower.co - fresh thinking in renewable energy