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### **Alternative Connection Application and Offer Process Proposal - Consultation Paper**

The Ulster Farmers' Union is the largest representative of the farming/land-based sector in Northern Ireland with 12,500 members. Over the last 10 years, many UFU members have committed themselves to small scale renewable energy projects; wind, hydro, AD and solar PV, vast sums of money have been spent on capital equipment, professional services and lengthy and expensive grid connection application processes.

The UFU wish to commend both NIE Networks and SONI on this excellent piece of work. However, we need to point out that we do not deem it appropriate to answer questions which relate specifically to Transmission Connection applications and we will leave these questions marked as N/A.

#### **Question 1: Do you have any additional suggestions for consideration in relation to continuing to apply the existing connection application and offer process given the recent influx of connection applications received?**

In addition to the significant upfront costs, UFU members have committed many man-hours to small scale renewable projects. The UFU have been on record on many occasions, citing the barriers which our members faced over the last 10 years. One of the most common barriers was the planning process, with NIE making it a pre-requisite that planning permission being required before applying for grid connection. This was in contrast to GB, where planning and grid connection could be applied for in tandem.

The UFU are on record stating that planning permission as a pre-requisite was a hindrance for small scale renewables and would hold the sector back from developing. We are of the opinion that had the proposed alternative connection application and offer process be in place previously, we would have not seen many of the barriers which occurred in the grid connection process. The sudden removal of the planning permission pre-requisite on 12 August 2015 led to the run on grid connection applications in late August/September. Of the 870MW of new applications, only 40MW of it was from prospective small scale developers, i.e local landowners.

#### **Question 2: Do you consider that the underpinning principles of the proposed connection application and offer process at a high level address the approach necessary to deal with the influx of connection applications? Can you suggest any further principles that should be considered?**

The High Level Principles provide ample coverage for the necessary approach.

#### **Question 3: Do you agree that the Batch Process is the most pragmatic alternative connection application and offer process to deal with the recent influx of applications? Do you have any other suggestions or specific comments on the proposed approach?**

The Batch process has been very well thought out and in the manner in which it is presented it would appear to be the most pragmatic alternative connection process.

**Question 4: Do you agree with the proposal to remove all consenting requirements for transmission connection applications?**

N/A

**Question 5: Do you agree with the types of connection applications that are proposed to be included in the Batch? Please provide reasons for any views expressed.**

Yes.

**Question 6: What do you believe would be an adequate length of time between a decision paper from this consultation process being issued and the proposed Closure Date? Do you agree that a 4 week period would be adequate? Please provide reasons for any preference.**

The 4-week period is adequate.

**Question 7: Is there any information you can provide to describe how it is proposed that the over-installed plant, particularly in the case where there is a mix of generation technologies, is capped to MEC safely and securely?**

N/A

**Question 8: Is there any information you can provide to describe how it is proposed to limit the availability declarations from the generation site to the SEM and the SONI control centre via SCADA?**

N/A

**Question 9: Please provide any information you feel could explain how, if there is more than one technology type on site, the generation behind the connection point will be reduced in the event of a system constraint or curtailment?**

The UFU want to raise the matter of on-site storage. Such is the progress in developing an on-farm storage solution, would this need to be a consideration when additional technology is being considered on a small scale renewable energy generation site.

**Question 10: Are there any further considerations for the TSO and DNO before this type of connection can be facilitated?**

No.

**Question 11: Do you agree with the proposal for allocating any remaining Cluster capacity as a priority and issue these offers outside of the Batch Process? Can you suggest any alternatives for consideration?**

Yes.

**Question 12: Do you agree that a change may be required to the weighting of projects connecting into Clusters that have not submitted for planning permission and subsequent connection offers have expired or been rejected? Would you consider a weighting of zero for such projects to be acceptable?**

N/A

**Question 14: Do you believe it would be a prudent approach in the first instance for the TSO to determine whether there is existing grid capacity and issue offers where there is capacity as a priority, accepting that other applicants not included in this phase 1 would need to wait longer for connection offers?**

N/A

**Question 15: In relation to connection offer validity periods, what length of time do you suggest would strike a balance between giving customers enough time to consider the connection offer and not unduly delay starting to process the remainder of the Batch?**

30 days, assuming customers have been fully briefed on the background to and the importance of the requirements.

**Question 16: In order to reduce time, it is proposed to allow a period of 10 days from information on initial nodal assignment being provided for a decision to be made on whether to withdraw from an application from the process. Do you consider that the suggested 10 day period will provide an adequate balance between reducing delays and allowing high level decisions to be made by developers?**

Please refer to answer to Question 15 above.

**Question 17: Do you believe that high level information on estimated nodal assignment, connection method, potential charges and estimated timeframes for delivery would be of value and enable a decision to withdraw early to be made?**

Yes, however, guidance and advice will need to be provide wherever possible.

**Question 18: Can you suggest any alternatives to ensure that customers are committed to their connection application?**

No, the recommendations are ample.

**Question 19: Do you agree with the proposal to share the costs of common connection assets between applicants on a per MW basis as described?**

Yes.

**Question 20: Do you think Proposal A or Proposal B is preferable for entry into the FAQ list? Do you have any other suggestions for entry into the FAQ list?**

Proposal A

**Question 21: Would a connection offer for generators of 5MW and above without firm access assessment provide sufficient information for that offer to be accepted or for high level decisions on project viability to be made?**

N/A

**Question 22: Would a connection offer which does not contain GOR information provide sufficient information for that offer to be accepted or high level decisions on project viability to be made?**

N/A

**Question 23: Is it essential for GOR information to be issued along with FAQ and ATR information or is GOR information alone sufficient information for an offer to be accepted?**

N/A

**Question 24: Do you agree that the offer acceptance criteria outlined above strikes the right balance between ensuring that applicants are committed to their projects, without being too onerous that applicants will not be in a position to accept their offer?**

Yes.

**Question 25: Do you agree that project milestones relating specifically to securing planning permission are required now that the planning permission pre-requisite has been removed for applications to the Distribution System? What do you believe to be an adequate length of time to secure planning permission after a connection offer has been accepted?**

The key is to ensure that network capacity is allocated fairly and used efficiently and any milestones which bring this about should be encouraged.

**Question 26: Do you believe that the outcome of the Ofgem milestone consultation in GB should be applied in Northern Ireland without further consultation?**

There needs to be further consultation. Past experience illustrates that NI cannot mirror GB in terms of grid.

The UFU would like to see any new thinking in relation to connection applications incorporating for example off-grid 'island' systems which would allow farms to be energy self-sufficient and storage development and this is lacking from this consultation, but as we said at the beginning of this consultation response, that aside, this is an excellent piece of work.

If you have any further queries in relation to our response, do not hesitate to call me on 02890 370222.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Osborne'.

**Chris Osborne**  
**UFU Senior Policy Officer**