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By email: gareth.mcloughlin@soni.ltd.uk

Dear Gareth,

RE: Allocation of Transmission FAQ in Northern Ireland & ITC Methodology to determine FAQs

Thank you for the opportunity to respond to this consultation. First Flight Wind Ltd. was awarded the exclusive development rights for the 600MW offshore wind farm site on the south east coast of County Down by The Crown Estate in 2012.

As developers of this offshore wind farm site, First Flight Wind supports SONI and NIE's decision to broaden the Firm Access Quantity (FAQ) consultation to include consideration of other forms of generation in addition to onshore. The ability to apply for a connection and receive a place in the Incremental Transfer Capability (ITC) queue is important to ensure that the development of the 600 MW offshore wind farm can progress according to its timetable and make a significant contribution towards Northern Ireland's 2020 renewables target.

We note that the connection arrangements for offshore generators are under consideration by the Northern Ireland Utility Regulator, and we will respond separately to that consultation. Subject to the outcome of the UREGNI consultation, we consider that offshore generators (as with onshore generators) should enter the Transmission FAQ allocation process when they make their generation connection applications. This would ensure a consistent point of entry onto the FAQ list for all technologies.

However, for offshore generators we believe that it is appropriate that applications for connection offers should be allowed in advance of obtaining planning permission. This is necessary for the offshore generators as the design of the projects (in terms of the location of the offshore platforms, cable corridors and landfalls) and the EIA process (in terms of the above and all the onshore infrastructure) both require a full understanding of the connection arrangements in advance of a planning application being made. It is not therefore possible to progress planning for the offshore projects without the necessary certainty on grid connection infrastructure afforded through the connection application process. We consider that the condition for such early application would be the granting of exclusive development rights from The Crown Estate as announced in October 2012.

The scale of the offshore wind project means that it can make a significant contribution towards the 2020 renewables target, but also introduces challenges in

terms of the timing of the development programme and the developer's ability to commit to what is a significant investment. Securing a place on the ITC list and allocation of FAQ for the project are vital for us in order to continue developing the project and making the necessary preparations for a significant financial investment decision in the coming years.

We do not believe that additional impact analysis is required before any decision is made on the appropriate time for offshore generators to be included on the FAQ generation list. Whilst such a study could yield helpful information on levels of FAQ going forward, we do not believe it changes the rationale for allowing all generators to apply for FAQ at the point of connection application.

Grid constraints within the All Island market will be one of the key risks to the development of the renewables sector and achievement of the Northern Ireland Governments renewable energy targets. Completion of existing grid reinforcement plans, particularly the Meath-Tyrone 400KV upgrade, will be crucial to the alleviation of grid constraint concerns and to the confidence of investors across the renewables sector.

Kind regards,



Richard Whitmore

Project Manager

First Flight Wind