

NIRIG response to SONI/NIE consultation

Allocation of Transmission FAQ in Northern Ireland and ITC Methodology to determine FAQs: Response and Further Consultation paper

12th April 2013

The Northern Ireland Renewables Industry Group (NIRIG) is a joint collaboration between the Irish Wind Energy Association and RenewableUK. NIRIG provides a conduit for knowledge exchange, policy development support and consensus on best practice between all stakeholders in the renewables industry in Northern Ireland. NIRIG welcomes the opportunity to respond to the SONI further consultation paper on Transmission FAQ and ITC Methodologies.

NIRIG is pleased to note that a number of the industry recommendations made in response to the previous consultation have been taken on board. In particular, we welcome the extension of the cut-off date for financially firm access for connected and contracted projects.

NIRIG would also like to note that while we understand the consultation does not focus on constraint reports, there is a clear need for these and we would urge that a timetable for the production of constraint reports be agreed between SONI and NIAUR as soon as possible, with a view to publication before June 2013.

The remainder of NIRIG's response addresses specific sections of the consultation.

3 Proposed decision regarding N Ireland Generator listings and the allocation of transmission FAQ

3.1 Starting point of allocating FAQs

NIRIG welcomes and supports the proposal that all wind farms with an accepted connection offer as of 31st December 2010 including any subsequent modifications or amendments to those accepted connection offers and windfarms connected by the 31st of March 2012 are considered financially firm. We would note, however, that this is inequitable treatment of those generators that had submitted connection applications before December 2010 but had not accepted offers due to delays in the cluster process.

3.2/3.3 Entry to the NI generation listing / Order in which applications are assessed in the ITC model

NIRIG welcomes the SONI/NIE proposal that connecting generators will be added to the ITC analysis list in order of the date of connection application, instead of the originally proposed planning permission date. NIRIG supports the process as proposed in the consultation for onshore projects only in entering the ITC analysis; however, NIRIG will be considering further the question of the

generation listing order for the purposes of the ITC analysis for offshore/storage(CAES) and so will respond with a more considered opinion in the NIAUR consultation closing in May.

NIRIG does recognise that condition 15 of SONI's licence obligations refers to a duty not to unduly discriminate:

In undertaking the Transmission System Operator Business, the Licensee shall not unduly discriminate as between any persons or class or classes of persons (including itself in undertaking any activity other than the Transmission System Operator Business).

NIRIG would request that additional impact analysis be carried out before any decision is made on the appropriate time for offshore/storage to be included in the FAQ analysis. For example, an additional perhaps 800MW of offshore and marine generation could be included in the 2018 model to provide a better understanding of the impacts of offshore generation on firm access quantities. However, NIRIG would strongly urge that any decision on offshore and storage (CAES) should not delay the publication of a decision on the other items within this consultation.

NIRIG would like to note a number of additional points:

- As there can be a significant timeframe between grid application, grid offer acceptance and then grid delivery, NIRIG would request that any subsequent revision of planning consent conditions does not affect the date stamp.
- NIRIG would also like noted that it is SONI/NIE's intention to reallocate FAQ under the normal ITC rules if a connection offer is not accepted within the connection acceptance period. NIRIG believes that this should not impact any revised connection offer issued as part of a dispute process.

3.4 Same date application

NIRIG supports the proposal that in the situation whereby the System Operator receives more than one connection application on the same date and the capacity is interchangeable then any available capacity will be allocated on a pro-rata basis based on MEC.

3.5 Offshore generation and CAES generation connection applications

See response to 3.2/3.3 above

4 Assumptions of ITC analysis

4.1 Time horizon

NIRIG welcomes SONI's intention to provide ITC results per transmission node on an annual basis for a seven year horizon.

4.2 Transmission reinforcements

NIRIG welcomes SONI/NIE's proposal to provide details of the necessary transmission reinforcements required to provide a connection with FAQ equal to MEC, along with the expected completion dates of these works. We also welcome the proposal to include ATR information with connection offers and the proposals to update generators as the project receives firm access. We believe that providing this information in a separate document to the connection offer will enable

the provision of up-to-date information. NIRIG would like to highlight that transmission reinforcements required for firm access, such as the Renewables Integration Development Plan (RIDP) should also be referred to, with indicative timeframes.

4.4 Moyle assumptions in the ITC model

NIRIG believes that the allocation of firm access should use realistic information about non-wind generation including consideration of the priority dispatch rules for renewable generation. We also believe that the East-West and Moyle Interconnectors should be treated consistently for the purposes of firm access by both SONI and EirGrid. NIRIG would recommend that flows on the Moyle Interconnector reflect future market conditions and SONI's priority dispatch obligations. Countertrading should take place to free up more capacity for renewable generators.

4.5 Threshold for assessing FAQs

NIRIG agrees that for the purposes of implementing proposed changes as soon as possible it is appropriate to proceed on the basis of using 5MW as a threshold until such times as a lower level may be deemed necessary. NIRIG supports the SONI/NIE proposal to undertake an analysis on the threshold level for assessing and allocating FAQ to distribution connection before applying any revised threshold. NIRIG would request further information on when such an analysis would be carried out and whether it would take place on a regular basis.

4.6 Temporary Firm Access

NIRIG believes that temporary firm access is a useful tool and also has the potential to promote efficient use of the network. It would only require to be removed when other generators connect and should be relatively straightforward to define. Temporary connections should not disadvantage permanent connections.

4.7 Special Protection Schemes (SPS)

NIRIG would recommend that SONI/NIE continue to use all possible methods of providing firm access for renewable generators in Northern Ireland, including, where appropriate, existing and new special protection schemes.

Figure B.4

NIRIG would suggest that a clear process should be implemented to allow SONI and NIE to consider the transmission and distribution LCTA and allocate the original connection application to the appropriate system operator, without the risk of the generator losing its place in the queue.

NIRIG welcomes the opportunity to respond to this consultation paper. If there are any questions or queries on the above, please do not hesitate to get in touch.

Meabh Cormacain

NIRIG