

By Email to Eimear Watson
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Generator Connection Process - Allocation of Transmission FAQ in N Ireland & ITC Methodology to determine FAQ - Consultation Paper on consenting requirements in advance of application for offshore generation connection

Dear Eimear,

In response to the specific question posed in the consultation; *Do you consider that an Exclusivity Agreement and an Agreement for Lease from The Crown Estate alone should be the required level of consent to allow offshore developers to submit a Connection Application?* ABO Wind would have to answer No.

ABO Wind reiterate the points made in our previous responses to the 2013 Utility Regulator and 2013 SONI Consultations of the same theme and address the assumptions made by SONI/NIE in their proposal.

- ABO Wind are strongly against any preferential treatment (queue jumping) for offshore generators in allocation of firm access. We believe that this would be discriminatory and could be subject to legal challenge.
- We would question what evidence SONI/NIE have used to determine that securing a Marine Licence is a *much more onerous process than the granting of planning permission for*

an onshore wind farm. The planning process for large onshore wind farms can be very arduous.

- There are a number of onshore wind farms in the planning process (including Evishagaran) which will require significant upgrade of the transmission system to facilitate connection to the electricity grid network. Why should onshore network development to facilitate offshore generators be given priority.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J/J Jellie'.

Joe Jellie

**Project Manager
ABO Wind NI Ltd**