

## **NIRIG response to SONI/NIE Consultation Paper on consenting requirements in advance of application for offshore generation connection**

**29<sup>th</sup> April 2014**

The Northern Ireland Renewables Industry Group (NIRIG) is a joint collaboration between the Irish Wind Energy Association and RenewableUK. NIRIG represents the views of the large and small scale renewable electricity industry in Northern Ireland, providing a conduit for knowledge exchange, policy development support and consensus on best practice between all stakeholders.

NIRIG welcomes the opportunity to respond to the SONI/NIE Consultation Paper on consenting requirements in advance of application for offshore generation connection. We welcome the clarifications issued by SONI on a number of elements of the consultation paper.

NIRIG believes that an Exclusivity Agreement or an Agreement for Lease from The Crown Estate alone should be the required level of consent to allow the System Operator to accept and process a submitted connection offer.

However NIRIG is unclear as to whether the connection application date would represent the entry point to the ITC listing. If it did, this would be different to the current rule-set for onshore connections. We had requested in our previous response an analysis of the impact of the proposal to allow marine and offshore projects entry to the ITC listing without planning consents. In the absence of such analysis our position is that any rule-set applied must pass the test of fairness, non-discriminatory and equitable treatment for all technologies.

NIRIG further notes that the absence of the second North South interconnector increases the likely impact of additional generation on the NI system regarding the ability to provide firm access.

NIRIG welcomes the opportunity to comment on this important consultation. The areas outlined above are of particular importance to the renewables industry and have significant implications for the viability of projects. Given the significance of the issues presented, NIRIG would like to request a meeting to discuss our response in more detail.

Yours sincerely,

*\*sent by email, bears no signature*

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Meabh Cormacain  
**NIRIG**