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Eimear Watson
SONI
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Our Ref: EN01-004571

28 April 2014

Dear Eimear

Re: RES Response to SONI - NIE Consultation on consenting requirements in advance of application for offshore generation connection

RES UK & Ireland (RES) has been developing wind projects on the island of Ireland since the early 1990s, having developed 15 operating wind farms in Northern Ireland and 4 operating wind farms in the Republic of Ireland, totalling over 267MW. RES currently owns or operates over 134MW of wind capacity across the island. In addition, RES has 50MW of wind capacity with planning consent in Northern Ireland and over 45MW of new wind generation currently in the planning system. RES has been an established presence at the forefront of the wind energy industry for over three decades. Our core activity is the development, design, construction, financing and operation of wind farm projects worldwide. With a portfolio of almost 8,000 MW constructed and several gigawatts under construction and in development, RES continues to play a leading role in what is now the world's fastest growing energy sector.

RES companies are also involved in other energy sectors including biomass, photovoltaic power and offshore renewables. With particular focus on offshore renewables in Northern Ireland, RES Offshore is a member of the First Flight Wind (FFW) Consortium that was the winner of a Crown Estate Tender for an Exclusivity Agreement to develop a 600MW wind farm in the waters off the coast of County Down. This response is submitted on behalf of RES only. First Flight Wind will be submitting a separate response to this consultation.

RES welcomes the opportunity to respond to the SONI - NIE consultation paper on consenting requirements in advance of application for offshore generation connection ("the SONI – NIE Consultation"). RES also responded to the UREGNI "Connection Arrangements for Offshore Generation" consultation of March 2013 ("the March 2013 consultation"). The views of RES in relation to the rights of offshore generators to submit applications for connection and also in relation to the sequencing of offshore generators in the Incremental Transfer Capability (ITC) process for determining Firm Access Quantities remain unchanged relative to those set down in its response to the March 2013 consultation.

RES' key message is that it does **NOT** support the proposal set out in the SONI – NIE consultation paper to link adding of offshore renewables projects to the ITC list by date of connection application **for offshore projects with an Exclusivity Agreement and Agreement for Lease from The Crown Estate**, as this would unduly discriminate against onshore generation projects that have to wait for receipt of Planning

Consent. The effect of this proposal would be a prolonged and raised grid constraint energy volume for those onshore projects, relative to that which would have applied if one or more offshore projects had not been permitted to effectively jump the ITC queue under the rules proposed. Adoption of the proposal in the SONI – NIE Consultation paper is likely to be highly damaging to the confidence of current and future investors in renewables in the All Island market.

RES continues to be of the view that, for offshore renewables only:

- the relationship between submission of connection application and adding to the ITC list should be broken; and
- the link between receipt of planning consent and submission of a subsequent generation connection application with adding to the ITC list should be established.

This arrangement would permit offshore developers to receive an initial offer of terms for connection from SONI that would allow continuation of project studies and progression of funding without discriminating against onshore renewable projects.

I hope you find the comments made in this response to be helpful. If you have any queries or seek clarification on any of the points raised please do not hesitate to contact me.

Yours sincerely



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