

Please reply to: The Electricity Storage Network
Dairy Farm, Pinkney, Malmesbury, Wiltshire, SN16 0NX
Telephone 01666 840948
Email info@electricitystorage.co.uk

Mr Gareth McLoughlin System Operator of Northern Ireland

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

12 April 2013

Dear Mr McLoughlin

We have just recently been made aware of the Generation Connection Process and your request for comments on the FAQ.

The Electricity Storage Network is a group comprising developers, manufacturers, users and others interested in the application and deployment of electrical energy storage in the UK and Europe. This response has been prepared as a result of discussions at a members' meeting held on 12 April 2013.

We welcome the consideration of compressed air energy storage in the FAQ process, but we would ask you to note our concern that connection arrangements should be made available to new technologies in such a way that projects are not excluded through mis-classification. We would argue that storage is not generation: electricity storage can provide numerous benefits to the network, as it both absorbs and outputs electricity. Storage can therefore improve the ability for other projects to be connected to the system.

We note that reference is also made to projects smaller than 5 MW. Electricity storage can be packaged in a variety of power outputs, and we request that your FAQ process does not exclude the ability for small scale or large scale storage to be connected to the network. It would seem reasonable that if a developer of electricity storage is able to commit to an operating regime that improves the worst case power system flows, then it should not be restricted in its ability to be connected to the network.

Our late knowledge of your work necessitates a brief reply, but we would be prepared to expand further on these points in the near future and we offer you our assistance in clarifying the above points.

Yours sincerely

Anthony Price Director

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