



Renewable Energy International,
Unit 3 Ormeau Business Park,
8 Cromac Avenue,
Belfast, BT7 2JA

Fao: Gareth McGloughlin
Gareth.mcgloughlin@soni.ltd.uk

Generator Connection Process

Allocation of Transmission FAQ in N Ireland & ITC Methodology to determine FAQs

- **REI Response to the above Consultation (Draft)**
- REI welcomes the extension of the cut-off date for financially firm access for connected and contracted projects.
- We also welcome the SONI/NIE proposal that connecting generators will be added to the ITC analysis list, chronologically, in the order of 'connection application date', instead of the planning permission consented date.
- REI believes that the 'connection application date' is the most appropriate point of entry for all technologies to ensure consistency. We feel that this initial 'connection application date' is the date to be used for onshore projects. We would also request confirmation that any subsequent change in connection detail, for example, a change from DSO to TSO, or in the case where NIE recommends a cluster connection rather than an LCTA, should not be considered as a re-application and should not be appointed a fresh connection date, indeed we feel that the initial date stamp must be retained.
- Notwithstanding the outcome of the NIAUR consultation, REI considers that all generators, including offshore generators should enter the FAQ allocation process on the same basis, that is, they will only be able to make an application for connection after the granting of initial planning consent. We feel this process should apply to all generation connecting to the NIE system.
- REI 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.

All Renewables Consulting Ltd, t/a Renewable Energy Int. Ltd, registered office at

Unit 3 Ormeau Business Park, 8 Cromac Avenue, Belfast BT7 2JA

The remainder of our 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

REI 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 all windfarms connected by the 31st of March 2012 are considered financially firm. We note, however, that this represents inequitable treatment of those generators that had submitted connection applications before December 2010, but which had not accepted offers due to delays in the cluster process.

We support the SONI/NIE proposal that connecting generators will be added to the ITC analysis list chronologically, in order of the application ‘date of connection’, instead of the originally proposed planning permission date. REI strongly believes that the connection application date, post-receipt of planning consent is the most appropriate point of entry onto the ITC list for onshore generators. However, REI would request clarification and a guarantee that the first connection application date, including any subsequent amendments to the connection application, is considered to be the relevant date stamp. If, for example, a project applies for an LCTA and NIE subsequently recommends a cluster connection, the date of the initial application should be considered the connection application date. Similarly, in a project where a change of system operator may be required, the re-application should be considered to be the same application, and its place in the connection queue should not be lost. REI would further recommend that appropriate systems should be created to track and safeguard queue position. We firmly support the principle of queue processing that acknowledges a generator’s original application. We would also argue that uncertainty in connection policy development over recent years has largely been beyond the control of the renewables industry, and that positive progress in grid infrastructure development and processes should not adversely impact developers who have applied for connection offers during this period of change.

REI notes that it is SONI/NIEs’ intention to re-allocate FAQ under the normal ITC rules if a connection offer is not accepted within the connection acceptance period. We believe that this should not impact any revised connection offer issued as part of a dispute process.

- Notwithstanding the outcome of the NIAUR consultation, REI considers that all generators, including offshore generators should enter the FAQ allocation process on the same basis, that is, they will only be able to make an application for connection after the granting of initial planning consent. We feel this is a fully equitable principle and that the process should apply to all generation connecting to the NIE system.

Paragraph 3.4 Same date application

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

Paragraph 3.5 Offshore generation and CAES generation connection applications

REI agree that, subject to the outcome of the NIAUR consultation, similar entry requirements should be used for other forms of generation.

4 Assumptions of ITC analysis

Paragraph 4.1 Time horizon

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

Paragraph 4.2 Transmission reinforcements

REI 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 give developers access to the most up to date information. REI feel that transmission reinforcements required for firm access, such as the Renewables Integration Development Plan (RIDP) should also be referred to, with indicative timeframes.

Paragraph 4.4 Moyle assumptions in the ITC model

REI 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. We recommend that modeled flows on the Moyle Interconnector reflect future market conditions.

Paragraph 4.5 Threshold for assessing FAQs

REI 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. We support 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.

Paragraph 4.6 Temporary Firm Access

We feel that temporary firm access is a useful tool which 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.

Paragraph 4.7 Special Protection Schemes (SPS)

REI 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

REI 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.

REI welcomes the opportunity to respond to this consultation paper and looks forward to as rapid a decision as possible. If there are any questions or queries on the above, please do not hesitate to get in touch.

Andy McCrea

Senior Grid and Markets Manager

Renewable Energy International