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Regulation (Ireland)

## **Allocation of Transmission FAQ in Northern Ireland and ITC Methodology to determine FAQs**

**12<sup>th</sup> April 2013**

Dear Gareth,

I am writing on behalf of SSER in response to the SONI consultation on generator connection process published on the 8<sup>th</sup> March 2012. We would like to state our support to the NIRIG response. Our separate response includes some general comments on the proposed methodology and a response to the question on introducing separate rules for some forms of generation to enter the FAQ allocation process.

### **Entry to the NI generation listing**

SSER welcomes the proposal to place connecting generators onto the ITC analysis list based on first connection application date. We would like to request confirmation that subsequent changes in connection will retain the date stamp from first application e.g. where a cluster connection is recommended by NIE, rather than an LTCA.

However, we would note that while some types of generator may need different and additional permissions in order to proceed, there should be a single rule for assessing and allocating transmission FAQ. We would note condition 15 of SONI's licence states:

*In undertaking the Transmission System Operator Business, the Licensee shall not unduly discriminate between any persons or class or classes of persons (including itself in undertaking any activity other than the Transmission System Operator Business).*

It would not be appropriate for the TSO to distinguish between applicants on the basis of generation type. The change from planning permission date to first connection application date provides further flexibility and leaves it to NIAUR, who are currently consulting on enduring offshore connection arrangements, to decide the point at which an offshore developer can apply for a connection.

I hope you find our comments helpful, please don't hesitate to contact me if you wish to discuss any of the points in our response.

Yours,  
Connor Powell