

Renewable Energy Systems Limited

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## 22<sup>nd</sup> February 2023

Submission by email to

<u>Electricity Networks Responses@uregni.gov.uk</u> <u>sean.lyons@uregni.gov.uk</u>

Attention: Sean Lyons

Dear Sean

## RE: RES Response to UR Consultation and Notice on proposed licence modifications to reflect the RP6 price control extension

RES is the world's largest independent renewable company and has delivered more than 23GW of renewable energy projects across the globe. RES has been at the forefront of renewable energy development for over 40 years and is active in a range of energy technologies including onshore and offshore wind, solar, energy storage and transmission and distribution.

From our office in Larne Co Antrim, RES has been at the forefront of wind farm development in the Republic of Ireland and Northern Ireland since the early 1990s. RES has a growing portfolio of solar and energy storage projects across Ireland.

RES's ambition to remain a part of Ireland's energy future, ensuring that our projects contribute to decarbonising our electricity system to the least cost to the consumer. We consider ourselves well-placed, therefore, to comment on the important issues addressed in this consultation and are grateful for the opportunity to respond to the Utility Regulator Consultation and Notice on proposed licence modifications to reflect the RP6 price control extension.

In principle we have no objection to the Utility Regulator proposals to modify NIE Networks' licences to allow for the extension of the RP6 period by one year in order for NIE Networks to finalise their RP7 Business Plan so that issues relating to net zero including the incorporation of renewables are properly considered.

Our concern would be the potential impact of the extension on network investment projects which were supposed to be commenced and progressed during the RP7 period. With the original RP7 price control period changed from period 1 April 2024 to 31 March 2030 to 1 April 2025 to 31 March 2030 the potential impact would be to delay network investment projects by one year. Clearly this would need to be mitigated in the RP6 extension period. We note that the consultation document states that RP6 period Planned Network Investment Volumes and Allowances would be amended to allow for additional network investment delivery in the RP6 extension year. If the volumes and allowances are adequate this would sufficiently mitigate this potential impact.

The above comments are offered in a spirit of positive cooperation towards the development of an appropriate connection policy, and we will be happy to further clarify any of the points raised in this letter.

## Yours faithfully

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