

Jody O'Boyle Utility Regulator Queens House 14 Queen Street Belfast BT1 6ED

Re: MEL Response - UR Consultation on proposed changes to NIE Networks' cluster methodology in NI within the Statement of Charges

Introduction

Mutual Energy is responding to this consultation on the basis that it is a company committed to the timely delivery of an energy transition in Northern Ireland which is cost effective and keeps consumer value at the forefront. We believe efficient planning, operation and considered development of the energy networks is critical to realising decarbonisation ambitions which have been legislated in Northern Ireland.

Cluster Methodology Proposal – MEL Thoughts

Mutual Energy support the use of the cluster methodology as since being initially reviewed and implemented in 2011, has allowed large volumes of renewables to be connected at once, allowing for an increase in the volume of renewables which can be connected to the network because of the more efficient connection arrangement it enabled. This has shown to contribute significantly to the wind generation which has been able to connect in Northern Ireland since then.

We are therefore supportive of the proposed incorporation of demand at clusters as we see this as increasing the ability of Northern Ireland meeting the legislated 80% RES-E target by 2030. We are also supportive of the use of storage, given current over supply issues which are being faced. Shaping Our Electricity Futures (SOEF) v1.1 and the recent SONI Long Duration Energy Storage consultation both stressed the issue of oversupply in the future, and allowing demand as well as storage within the cluster methodology would mitigate this risk. This will be subject however to the employment of appropriate charging arrangements.

Similarly, we would like to note that it may be beneficial to consider some level of socialisation of cost for the integration of biomethane onto the gas network. In our view, this could serve to improve access to the grid and provide an opportunity for growth in the biomethane sector in NI by allowing easier access to the grid.