

**NIRIG response to NIAUR consultation  
'Reviewing our consultation guidance: a discussion paper'**

**27<sup>th</sup> February 2013**

The Northern Ireland Renewables Industry Group (NIRIG) is a joint collaboration between the Irish Wind Energy Association and RenewableUK. NIRIG provides a conduit for knowledge exchange, policy development support and consensus on best practice between all stakeholders in the renewables industry in Northern Ireland. NIRIG welcomes the opportunity to respond to the NIAUR discussion paper on consultation guidance.

The current focus of the consultation discussion paper applies to consultations run by the Utility Regulator only. As the Utility Regulator is indirectly responsible for the conduct and successful conclusion of consultations conducted by various Regulated Licence Holders NIRIG suggest that there also be regard given to the consultations that are conducted by parties that fall under the regulatory umbrella, and whose outcome may ultimately be arbitrated by NIAUR.

NIRIG would suggest that the scope of the consultation guidance document under discussion be expanded to include a section on "Consultations by Regulated Licence Holders" which clarifies how the Utility Regulator will handle Regulated Licence Holder consultations and a requirement (or at least recommendation) that the bodies it regulates publish their own consultation guidelines in line with the example of best practice set by NIAUR. This would perhaps help in any instances where there is a lack of clarity on who, between the Utility Regulator and the Regulated Licence Holder, is best placed to conduct a consultation on some policy matters.

The remainder of our response follows the format of the five issues for discussion as laid out within the consultation document.

**1. General format of our consultation guidance**

NIRIG concurs that the guidance document should be more clearly set out. For example, the inclusion of 'Must dos' and 'Should dos' in the current guidance indicates two tiers of good practice and best practice. NIRIG would recommend that all consultations follow a clearly-defined single set of best practice principles.

**2. Process**

NIRIG agrees that improved feedback on consultation responses would be welcome. We would also recommend a timeframe for the publishing of all relevant documentation following consultation.

Consultation exercises should also be clear about the scope of the exercise, setting out where there is room to influence policy development.

NIRIG would also recommend that a plan of consultations be published at the beginning of the year, with indicative timeframes. While the NIAUR Forward Work Programme includes a series of strategic themes and actions, with outline dates for completion, this could be enhanced with a specific work plan for consultations.

### **3. Engagement**

NIRIG would strongly recommend that pre-consultation take place with much greater frequency. An informal dialogue should be held with stakeholders prior to a formal consultation to obtain initial evidence and to gain an understanding of the issues that will need to be raised in the formal consultation. This dialogue could take place in a number of ways, including through meetings, workshops and briefings, as well as forums such as the Renewables Grid Liaison Group. The dialogue should also involve all relevant stakeholders as the issues to be consulted upon are often complex and will require input from SONI, NIE, DETI (for example), as well as industry.

Further, it should be made clear at the outset the involvement of relevant stakeholders and the next steps which may need to be taken to conclude the policy process. In the planning phase, there should be coordination between relevant bodies to see whether opportunities exist to minimise the need for additional consultations.

For example, on 16 March 2010, NIE issued a cluster consultation paper (Charges for Connecting Groups of Generators to the Northern Ireland Distribution System). On 15 November of that year, the Utility Regulator also issued a Connection policy consultation (Consultation on Electricity Connection Policy to the Northern Ireland Distribution System) and on 21 April 2011 issued its Decision Paper on the Charges for Connecting Groups of Generators. In August 2012 the NIE consultation paper - Methodology for Connecting Groups of Generators to the Northern Ireland Distribution System using Cluster Substations was issued. The cluster issue has not yet been resolved and NIRIG would strongly recommend that in future such multiple consultations be minimised, or at least resolved within specific timeframes, in order to prevent delays in policy such as we have seen in this instance.

NIRIG understands that as some policies develop, more than one formal consultation exercise may be appropriate. However, in deciding how to carry out such re-consultation, NIRIG believes that it is particularly important to assess any potential delay in implementing the policy and care should be taken to minimise any such delays.

### **4. Timing**

NIRIG would agree with the timeframes proposed for consultation.

NIRIG would strongly recommend that timeframes be introduced for decisions or next steps after consultation, and if there are likely to be delays then the reasons for these communicated to stakeholders along with a revised timeframe.

## 5. Accessibility

NIRIG would agree that enhanced accessibility of documents would be beneficial. This could also include links to relevant documents on other website, where appropriate, such as on the NIE or SONI websites.

NIRIG welcomes the opportunity to respond to this discussion paper. If there are any questions or queries on the above, please do not hesitate to get in touch.

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