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By email: ciaran.maccann@uregni.gov.uk

Dear Sirs

NIAUR Call for Evidence on a Review of Electricity Distribution and Transmission Connections Policy

ABO Wind N.I. Ltd is a subsidiary of the German-based ABO Wind AG, one of Europe's most experienced wind energy developers. The company was founded in 1996 and has over 300 employees in Germany, France, Spain, Scotland, Ireland and Argentina, with interests in Portugal, Belgium and Bulgaria. ABO Wind has been successful in developing, constructing and maintaining wind farms with over 1000 MW of rated capacity in Europe. ABO Wind has commissioned 7.5MW in Scotland, 70MW in the Republic of Ireland and currently has 128MW at various stages of the planning and development process in Northern Ireland.

ABO welcomes the opportunity to respond to the Call for Evidence and trusts this will inform a robust consultation process to follow. We support the submission made by NIRIG on behalf of the industry and would highlight the following key points:

- In the absence of proper legislation at this time, we strongly believe that planning permission should be a requirement for offering a grid connection. Longer term, new policies based on key delivery milestones could be developed and enshrined in the relevant legislation.
- Whilst we acknowledge the role of Utility Regulator (UR) is to regulate and develop the industry within the parameters of Ministerial *energy* policy, we recommend that the UR licence needs to be reviewed to assess the remit of the UR in the review and approval of *connection* policy in line with other jurisdictions. A working group comprising key department, bodies and industry representatives should be set up to inform and facilitate this review.
- Despite the closure of the NIRO, the need for renewable electricity will continue to grow and develop in Northern Ireland firmly rooted in the need to deliver on the Paris Agreement and building on the successes NI has enjoyed to date. Efficient and cost-effective grid connections will be required to facilitate this growth.

Q1. Do you agree with these strategic priorities?

We largely agree with the strategic priorities however feel these should be extended to include a robust regulatory framework also. As noted above, we believe the UR licence should be reviewed to allow for non-contentious changes to connection policy eg introducing the milestone of planning permission for grid offers and introducing rebates. We also believe there is a wider role for the UR in setting connection policy. This is consistent with UR's current role in setting policies in the SEM, which includes connection access policies and would serve to streamline the framework and make it more responsive to the changing needs of the industry. This is key to delivering the third strategic priority of "*Timely, robust and flexible connections process*".

In respect of the other listed strategic priorities:

1. Effective and cost-effective connections

This is essential for the continued growth of renewable electricity. It should not be assumed that because sufficient grid capacity has been issued that all these projects will be delivered.

2. High levels of quality of service and transparency in the provision of connections

A greater level of published, up-to-date network and generator information is required in line with GB and ROI.

Q2. Do you agree that these are the main developments we should be mindful of? Are there any other developments which are important?

As referenced in the document, it is clear that the electricity industry has undergone significant change in recent years. We believe that it is timely to review the regulatory framework and UR licence to ensure the framework continues to be robust and importantly, that it is responsive to future change, in line with the stated strategic priorities.

Northern Ireland has enjoyed a high level of success in reaching a quarter of consumption from renewable sources to date. Moving forward, efficient and cost-effective connections are essential to support future growth. Whilst we believe there is a market for merchant wind projects, it should not be assumed that every project with a grid connection offer will be built out.

Furthermore, there could also be opportunities in the future to increase network capacity with new smart grid technologies as well building more network assets. The introduction of storage and controllable demand will also contribute.

We would also highlight that the UR must address the slow development of the transmission reinforcements required to provide firm access to a large number of windfarms that are connected and/or contracted. As well as new transmission circuits, existing transmission circuits can be uprated to increase the capacity of the system. NIAUR should be encouraging innovative practices to address transmission reinforcement needs.

Q3. Is there a role for connections policy to promote effective network management? If so, what are the issues which need addressed and potential solutions as part of this review?

Yes. As noted throughout, the needs of both generators and demand customers will continue to change and thus so will connections policy. This further supports the need for a robust and responsive regulatory framework to deal with changes in an efficient manner.

Q5. Should we review how the connections process and queue is managed? If so, what are the issues which need addressed and potential solutions?

As noted above, we strongly the requirement for planning permission is reinstated as a requirement for grid connection offer.

Q6. Should we consider connections customer service, engagement and pricing transparency as part of this review? What are the issues which need addressed and potential solutions?

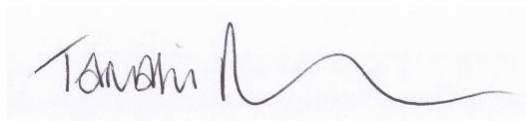
We recommend the UR has greater power in setting connection policy.

Q7. Are there other issues we should review? Which issue(s) are in your view the most material and why?

- In the absence of proper legislation at this time, we strongly believe that planning permission should be a requirement for offering a grid connection. Longer term, new policies based on key delivery milestones could be developed and enshrined in the relevant legislation.
- Whilst we acknowledge the role of Utility Regulator (UR) is to regulate and develop the industry within the parameters of Ministerial *energy* policy, we recommend that the UR licence needs to be reviewed to assess the remit of the UR in the review and approval of *connection* policy in line with other jurisdictions. A working group comprising key department, bodies and industry representatives should be set up to inform and facilitate this review.
- Despite the closure of the NIRO, the need for renewable electricity will continue to grow and develop in Northern Ireland firmly rooted in the need to deliver on the Paris Agreement and building on the successes NI has enjoyed to date. Efficient and cost-effective grid connections will be required to facilitate this growth.

We thank you for the opportunity to respond to the Call for Evidence and it is respectfully requested that our concerns are taken on board by the UR. We look forward to continuing to engage with the UR on the matter.

Yours sincerely,



Tamasin Fraser
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ABO Wind NI Ltd