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30 May 2013

**ABO Wind N.I. Ltd (onshore wind developer) – Response to the Utility Regulator
consultation dated 7 March 2013 “Connection Arrangements for Offshore Renewable
Generation”**

Dear Mr Mulhern,

ABO Wind NI Ltd is responding to this consultation because of the possible outcomes from points raised in section 8 “Changes to the Connection Application Process and the NI Connection Queue” as these will have serious and fundamental ramifications for onshore renewable generators.

We would strongly object to the proposal in the consultation that “One potential option would be to allow offshore developers to apply for a connection and be added to the ITC analysis list once they have development rights from The Crown Estate”.

Our reasons for objecting are set out as follows;

Firstly, when we consider the case for committing investment prior to securing planning permission, on a per MW basis the difference in developing on and offshore projects is not that dissimilar to warrant a special case being made for offshore.

Secondly, we would question whether a fully executed grid connection offer with firm access quantity is really necessary to complete the planning and EIA process.

Thirdly, allowing offshore projects to progress a grid connection application without planning permission for the offshore project implicitly confers an advantage by allowing these projects to come to market earlier. This is unfair and discriminatory to onshore projects which will be affected earlier by higher levels of curtailment & constraint.

Fourthly, offshore projects receiving development rights from Crown Estates is comparable to onshore developers signing a land lease. Offshore developers should not be allowed to apply for a grid connection prior to obtaining planning permission unless the same rule will apply to onshore developers. Anything less than this would be unfair and discrimination between renewable generation technologies.

Finally, allowing offshore developers early entry into the ITC listing by virtue of an early grid application has very serious implications in terms of higher levels of constraint for onshore generators which is wholly unfair, discriminatory and we believe open to legal challenge. We think it would be advisable for the UR to undertake a full legal review and publish the findings as part of the consultation process.

ABO Wind have no objection in principle to a system which allows for grid applications to be progressed prior to receipt of planning permission provided it applies equally to all generators both on and offshore.

Because these issues are of fundamental importance to both onshore developers as well as offshore we would call on the UR to widen this consultation and take into account onshore connection policy, before any decision should be made.

Yours Sincerely

A handwritten signature in black ink that reads 'Joe Jellie'.

Joe Jellie
ABO Wind N.I Ltd