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Mr. Jody O'Boyle
Utility Regulator
Queens House
14 Queens Street
BELFAST
BT1 6ED

Monday, 21 October 2019

BY EMAIL ONLY

Dear Mr O'Boyle,

Re: Ballyutoag Wind Farm response to UREGNI consultation on Proposed Modifications to NIE Networks Transmission and Distribution Licences for Capex Connection Costs on a pass through basis of 19 September 2019

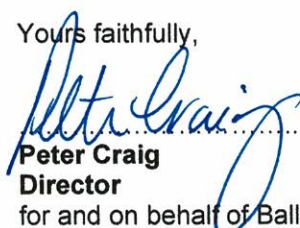
Ballyutoag Wind Farm Ltd ("BWF") welcomes the opportunity to respond to the above referred to UREGNI Consultation. The proposals set out in the Consultation, to enable Northern Ireland Electricity Networks ("NIEN") to recover, by way of capex pass through allocated to its RAB, any costs payable by it to SONI for use of shared connection assets, which have been paid for by a third party transmission connectee are necessary and welcome.

BWF is aware of at least one instance in N. Ireland where a SONI transmission customer (namely; Brockaghboy Windfarm Ltd) has previously paid the full cost of such shared connection assets to SONI but has not yet received a proportionate cost share reimbursement, notwithstanding that SONI has issued a connection offer to NIEN Distribution for the connection of the Agivey cluster substation to the Transmission System.

BWF would expect NIEN Distribution to submit a request for approval to UREGNI for an amount equal to the Use of Shared Asset Charge to be added to its RAB immediately upon earlier of (i) the acceptance of the connection/works offer referred to above, or (ii) the outcome of this Consultation / giving effect to the necessary Licence modifications. This would allow SONI to meet its contractual obligations to issue a reimbursement for any existing transmission assets that have already been funded on a shared use basis by existing transmission connectees. The proposals set out in the Consultation should of course also apply in circumstances where SONI and NIEN is treating the connections as simultaneous for charging purposes.

If you have any queries or comments on this response, please contact the undersigned by return.

Yours faithfully,


Peter Craig
Director
for and on behalf of Ballyutoag Wind Farm Ltd