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11<sup>th</sup> January 2017

**Utility Regulator: Review of Electricity Distribution and Transmission Connections Policy – Call for Evidence**

Dear Sir/Madam,

In October 2012, the Crown Estate awarded an Agreement for Lease (Afl) for the development of a 100 MW tidal energy park located on the north coast of County Antrim in Northern Ireland. The project is significantly advanced through the environmental impact assessment process with offshore surveys complete.

Fair Head Tidal Energy Park (FHTEP) Ltd is a joint venture company established for the Project by DP Marine Energy Ltd and Bluepower NV. FHTEP proposes to develop a 100 MW tidal energy park in the waters offshore of Fair Head.

A significant risk to the delivery of the project is associated with access to the grid and the current uncertainty relating to the grid connection process. We therefore welcome this consultation and opportunity to provide a response.

We are members of the Northern Ireland Renewable Industries Group (NIRIG) and are supportive of their response with the following additions and comments:

**Q1. Do you agree with these strategic priorities?**

We are in broad agreement with the strategies laid out, with the comment that there is a lack of emphasis in the strategic priorities that activities will be put in place that will enable the renewable energy targets to be met. To ensure future proofing of the electrical network in the long run, connection policy must be robust and adaptable to technology innovations (including storage, smart metering etc), in addition to market and policy changes.

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?

The NIRIG response emphasises the need for ongoing change in connection policy in the future given the presence of new connection types such as co-location, over-installation and zero export connections, smart connection policies, and changes in demand behaviour. In addition, we note that SONI and NIE Networks must manage their networks in an economic, co-ordinated and efficient way. In our opinion, this requires a diverse mix of electricity generation, with different output profiles, predictability and sources of primary energy. The existing initiatives, e.g. locational signals among others, have the potential to discriminate against certain types of renewable energy. Transmission reinforcements need to be delivered to reduce constraints. We are in agreement with NIRIG that Project 40 needs to be reinvigorated in order to address the key connection policy work streams.

Thank you for the opportunity to provide a response. Please do not hesitate to contact me if you have any queries or wish to discuss the response in more detail.

Yours faithfully,

Sara Armstrong  
Electrical Development Engineer  
DP Energy