

DW CONSULTANCY LTD

21st October 2019

Mr. Jody O'Boyle,
Utility Regulator,
Queens House,
14 Queens Street,
Belfast

BT1 6ED

[Sent by email to electricity_network_reporting@uregni.gov.uk &
jody.oboyle@uregni.gov.uk]

Re: Consultation on Proposed Modifications to NIE Networks Transmission and Distribution Licences for Capex Connection Costs on a pass-through basis

Dear Mr O'Boyle,

We, DW Consultancy Ltd (DWC), are wind farm project developers operating in both Northern Ireland and the Republic of Ireland. We have been active in the Northern Irish wind industry for over fifteen years, and we have developed a large portfolio of operational and consented (c.200MW+) onshore wind farm projects. We welcome the opportunity to respond to the Utility Regulator's consultation on the '*Consultation on Proposed Modifications to NIE Networks Transmission and Distribution Licences for Capex Connection Costs on a pass-through basis*'.

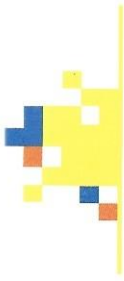
DWC welcomes that this consultation is trying to address irregularities that have arisen in connection policy for generators. However, we are very concerned that this consultation is only partly addressing the irregularities that have been identified during recent dispute processes. We note in the Utility Regulators final decision document in March 2019 on the NIE Networks/SONI dispute, that NIE Networks had highlighted (section 5.20) that consultation is required on not just how a transmission connectee is rebated when NIE Networks connectees are charged for shared transmission assets but also in the inverse scenario where a transmission connectee is charged in order to provide a rebate to NIE Networks, which it in turn can pass on to a distribution connectee.

We also note that when clustering connection policy was developed in 2010 it was recognised that there could be shared transmission assets between distribution clusters and transmission connected generators. At that stage NIE Networks proposed "*that should any of these circumstances arise then it reviews in conjunction with SONI and the Utility Regulator the particular circumstances and suitable arrangements are developed for those occasions, drawing on the conclusions of this consultation.*"¹ However as these scenarios have now arisen in the absence of relevant policy, the development of the necessary connection policy

¹ <https://www.nienetworks.co.uk/documents/regulatory-documents/connecting-generators-to-the-distribution-system-1.aspx>

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has been through disputes rather than consultation processes. We are therefore respectfully requesting that this consultation process considers both of the scenarios that NIE Networks have previously highlighted as requiring policy development.

Please do not hesitate in contacting us if you have any queries or wish to discuss this matter further.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'B. O'Kane', is written over a horizontal line.

**Barry O'Kane, B.Eng, C.Eng, MIEI,
Chartered Engineer
On Behalf of: DW Consultancy Ltd.**