



30th May 2013

Brian Mulhern
Electricity Directorate
Queens House
14 Queen Street
Belfast
BT1 6ED

[sent by email Brian.Mulhern@uregni.gov.uk]

Re: Connection Arrangements for Offshore Renewable Generation Consultation

Dear Mr. Mulhern,

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 ten years, and we have developed a large portfolio of operational (20MW), consented (c.100MW), and proposed (c.100MW) onshore wind farm projects. We welcome the opportunity to respond to the Utility Regulators consultation paper titled '*Connection Arrangements for Offshore Renewable Generation*'.

Our response focuses particularly on Section 8 of the consultation paper (Changes to the Connection Application Process and the NI Connection Queue), as we are dedicated onshore wind energy developers and do not believe that the other sections of this consultation document impact on onshore wind farm projects.

We are extremely concerned at the proposals in Section 8 to introduce a different set of connection application criteria for offshore renewable generation when compared with the criteria for onshore renewable generation. Up to this point the renewables industry in Northern Ireland has always supported the existing strict rule which dictates that projects cannot apply for a grid connection until they receive full planning permission from the appropriate body. This ruling has continued to provide a level platform for all renewable energy developers to date, and has ensured that no speculative projects have been able to secure valuable grid capacity to the detriment of other permitted projects.

We view any proposal to allow offshore renewables to 'jump' ahead of onshore renewables in the connection offer process as **completely discriminatory**. Under EU and Northern Ireland legislation there are clear rules to restrict this form of discrimination. We strongly recommend that the Utility Regulator fully considers the legal implications of such an inequitable treatment of onshore renewable generators.

Even though offshore projects have received a lease option from the Crown Estate (equivalent of an onshore developer signing lease agreements with relevant landowners) there is substantial survey, design and consenting works to be completed before they would be at a similar stage as an onshore wind farm has to be at before it can apply for a grid connection. It is important to note that until the survey and design works are complete the actual size of the facility is not even established. Onshore wind farms have to go through similar processes and it is

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normal for a wind farm to reduce in size during this design process. In-fact, the size of an onshore wind farm is not properly established until after the consenting process as it is not unusual for turbines to be dropped at this stage. For these reasons we cannot understand how the offshore developers can accurately predict at the pre-consenting stage the maximum export capacity required for their project. Without completing these processes they will be speculatively booking valuable grid capacity.

It is also very important to consider the scale of the generation that it is being proposed to receive preferential treatment. The current proposal of c.800MW of generation is a huge figure in the context of the Northern Ireland electricity system. This is greater than the total summer night demand on the Northern Ireland system and one third of the total all-island minimum demand.

In Section 8.2 of the consultation paper it is also suggested that the offshore developers require connection offers in order to apply for consent for the grid connection assets together with the generation facility as part of a single application. To the best of our knowledge, all onshore generation in Northern Ireland and Republic of Ireland (renewable and non-renewable) have, to-date, been able to separate the consent for the generation facility from the grid connection assets. The only element of the grid connection which the generator must deliver through the consenting process is the onsite substation.

This substation is the point of connection for the generator with the distribution or transmission system. We cannot see any reason why the offshore developer cannot determine a landing point and if necessary get planning permission for a substation near this landing point (all of which can be completed without a grid connection offer, in a similar fashion to how on-shore developers work). We further note that it will be a number of years before contestability on delivery of grid connection assets is available in Northern Ireland, therefore it would be the system operators (rather than the generators/developers) responsibility to apply for consents for the onshore grid connection assets.

To prematurely allocate grid capacity to offshore generation in a clearly discriminatory nature will have major implications through the all-island electricity industry. The current process of requiring planning permission for the generating station before you can apply for grid connection is a fair and equitable process **for all renewable generators**. We oppose the current proposal of allowing offshore renewable generators gain an unfair advantage by jumping ahead of onshore renewable generators in the grid connection process in the strongest possible terms.

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 black ink, appearing to read "Barry O'Kane", is written over a horizontal line.

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

cc Ms. Doreen Walker

DW Consultancy Ltd.