

**ESBI Ocean Energy**, Stephen Court, 18–21 St. Stephen's Green, Dublin 2, Ireland.  
**Tel:** +353 (0) 1 703 8000 **Fax:** +353 (0) 1 662 3241 **Web:** [www.esbi.ie](http://www.esbi.ie)

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Sarah Friedel ([sarah.friedel@uregni.gov.uk](mailto:sarah.friedel@uregni.gov.uk)) and  
Albert Shaw ([albert.shaw@uregni.gov.uk](mailto:albert.shaw@uregni.gov.uk))

Utility Regulator,  
Queens House, 14 Queen Street,  
Belfast, BT1 6ED  
(sent by email)

Dear Sir and Madam,

ESBI Ocean Energy welcomes NIAUR's Consultation on Electricity Connection Policy to the Northern Ireland Distribution System.

ESBI Ocean Energy supports the response submitted by ESB Wind Developments Ltd on this consultation. However in this submission, ESBI Ocean Energy would like to distinguish where tidal energy developments differ from on-shore developments.

ESBI Ocean Energy looks forward to further engagement on the issue of connection of tidal energy developments in Northern Ireland.

Yours sincerely



Cera Slevin, Project Manager,

ESBI Ocean Energy, ESBI Investments

cc: Barbara Swann, DETI

cc: ESB Wind Developments

ESBI Ocean Energy is a trading name of ESB International Investments Limited.

**Directors:** John McSweeney, Suzanne Ward, Paul Tobin, John Redmond.  
**Registered Office:** Stephen Court, 18–21 St. Stephen's Green, Dublin 2, Ireland.  
**Registered in Ireland No.** 137736



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## ESBI Ocean Energy

ESB International has a target of developing 150MW of ocean energy by 2020. In order to meet this target ESBI is focusing on the significant wave resource that exists off the west coast of Ireland and the significant tidal resource that exists in Northern Ireland. ESBI Ocean Energy is a business unit with ESB International, tasked with developing Ocean energy on the island of Ireland.

ESBI Ocean Energy expects tidal energy to contribute to the renewable energy targets by 2020 for Northern Ireland. It is likely that initial developments will be of the scale to connect to the distribution system on-shore, hence ESBI Ocean Energy response to this consultation.

## Tidal Energy in Northern Ireland

ESBI Ocean Energy refers to DETI's Strategic Environmental Assessment (SEA) of Offshore Wind and Marine Renewable Energy and draft Strategic Action Plan (SAP) in this response. All documentation is available at <http://www.offshoreenergyyni.co.uk/>. ESBI Ocean Energy also refers to The Crown Estate's methodology for marine leasing [http://www.thecrownestate.co.uk/our\\_portfolio/marine/wave-tidal.htm](http://www.thecrownestate.co.uk/our_portfolio/marine/wave-tidal.htm).

## Connection Policy

ESBI notes that the current connection system, which requires full planning permission before requesting a grid connection, is unsuitable for tidal energy development. While this arrangement was put in place for on-shore wind, ESBI do not believe it is appropriate for tidal projects in NI.

Development at sea differs, as the lease for the seabed is through a competitive process when developers apply for an Agreement for Lease. The competition assesses the developer's likely potential of being able to develop the "sea-bed" and awards the lease accordingly. Hence a thorough exercise has already been carried out by the time the lease has been awarded. The Agreement for Lease, once awarded, is based on a "use it or loose it" type policy as the development must achieve the required consents within the agreed timeframe.

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### **Clusters and Grid Development**

During the execution of the SEA and the development of the draft SAP, tidal development zones were identified and marked up on maps. Hence the possible locations are known. Also DETI has expressed a target of 300MW of tidal energy by 2020. The outcome of the Crown Estate's marine leasing round should determine the locations and sizes of marine development (MW) and the timeframe for such. These amalgamated figures could then be used by NIE as a design basis for grid development.

As the Crown Estate has already carried out a marine leasing round for wave and tidal energy in the Pentland Firth in Scotland, guidance should be sought from the developments there for adopting a connection policy for marine renewables. ESBI Ocean Energy anticipates that a revision to connection policy will be required for marine renewables in Northern Ireland due to the distinct difference between marine renewables and on-shore renewables.

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