



**Response by Energia to Utility Regulator,
Call for Evidence**

***Review of Electricity and Transmission Connections
Policy***

11th January 2017

1. Introduction

Energia welcomes the opportunity to respond to this UR consultation on Review of Electricity and Transmission Connections Policy. Energia is one of the largest contributors to the achievement of renewable targets in Northern Ireland through its investment, development, contracting and trading activities in the renewable sector

The delivery of contestability is important for Northern Ireland as we not only continue to strive towards our 2020 renewable energy targets, but also in order that we can continue to build upon the jobs and investment already delivered by the industry. However, in light of recent decision re the closure of support for renewables in particular wind, it is essential that resources are focused on ensuring planned and existing projects are delivered. As such Energia would have reservations that focusing on a cluster approach may not be appropriate, as fewer projects will be likely to be able to connect, and linkages between project developers could become a blockage for some projects to connect.

Contestability should provide a viable alternative for developers that are not prohibitively expensive, cumbersome or slow. Failure to deliver these will result in contestability connections not being a viable alternative for developers. To facilitate this NIAUR should examine its role in relation to approving grid connection policy. Legislative changes are not reactive enough to keep up with developments and as such an expanded role for the regulator in this context may be warranted.

General Comments

In addition to supporting the NIRIG detailed response, Energia supports the following key proposals:

- Energia supports amending the Utility regulator's licence to further its' role in reviewing and approving connection policy. This will expedite matters greatly in delivering connection policy as opposed to legislative changes.
- Given the volume of connection applications and the NIRO closure, Energia contends that planning should be a condition for connection offers to be issued and not based on the batch process. The batch process does not differentiate between legitimate and speculative offers. Given the resource and timing constraints legitimate projects need to be prioritised.
- There should be a prioritisation of storage and DS3 proposals.
- It is important that a rebate policy is implemented, such that customers who have to pay for connection assets which are greater than what they ultimately require are rebated if other customers connect to or use those assets at a later date.

Finally, given the major transmission constraints Energia would have concerns that Clustering of projects will not deliver optimum results.

Energia would welcome the opportunity to discuss further the points raised in our response.