

Dear Mr McKeown,

Further to the Contestability in Connections Proposed Next Steps Paper, dated 11<sup>th</sup> May 2015, we have considered the proposed next steps. Set out below are comments for your consideration.

**3.1.1: Connection Type:** Lightsource agree that Contestability should be available to both Transmission, Distribution, On Shore and Off shore Connections.

**4.1.3 : Scope Of Contestability:**

**Commissioning:** Commissioning of contestable assets should be contestable works.

**Inspection and Monitoring:** If this is to be non-contestable works then NIE will need to be suitably resourced to ensure developers project timelines are not impacted by a lack of resource. DNO's lack of resources in this area has caused some issues in the UK particularly around the ROC's deadlines.

**4.1.1: Inspection and Monitoring:** Lightsource agree with Powercons response that the Inspection and Monitoring criteria need to be clearly advised in advance of project development. This will ensure developers have an opportunity to meet the DNO standards and gain approval in the first instance. Additionally the criteria must be consistent throughout Northern Ireland and not subject to regional preferences.

**4.1.5:** Lightsource believe NIE should increase Commissioning resources as it has been a known constraint for many years and an unnecessary project risk for developers.

**4.1.6:** Lightsource agree it should be the DNO / TSO 's decision as to the Ownership Boundary.

**4.1.8:** Lightsource agree with clear separation of works. However, as there are currently no ICP's in Northern Ireland we suggest the ICP approval processes starts as soon as possible to ensure there are ICP's available at the time of introducing contestability. There are no ICP's in the Republic of Ireland, therefore if there is a lag in the development of ICP's, suitably qualified electrical contractors should be allowed to do the works in the transitional period.. They will be subject to DNO Design Approval, Inspection and Monitoring and Commissioning Tests. Therefore there will be no risk to NIE's system.

**4.1.13:** Lightsource agree that the immediate ability to contest Wayleaves and access rights with landowners would be beneficial.

**4.1.14:** Lightsource agree that an easier transition to contestability would be to adopt the ROI contestability template as it is well established and proven. The UK template is more advanced and the main difference being the restriction of contestable works to ICP's. We believe this will take longer to implement. However the TSO's and DNO's in the UK and ROI already have approved functional specifications for connection assets, therefore these should be adopted as opposed to re-inventing the wheel.

**6 Accreditation:** Lightsource agree with NIRIGs response regarding Accreditation, this should not present a barrier to the market or delay the implementation of contestability. The ROI model is well governed and tested, if accreditation is introduced this should be at a later phase.

**6.1.5 and 6.1.5:** Lightsource agree with SONI regarding assessing the benefits and costs of accreditation.

8.1.5 Consultation Response: Lightsource agree there should be transparency regarding Connection Costs. In ROI the CER has published standard connection charges which enables developers to plan projects, and make informed decisions on financial risk.

I would be grateful to receive confirmation of receipt of the response.

Should you require any further information, please do not hesitate to contact me.

Kind Regards

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