

From: [Jonathan Horne](#)
To: [MacCann, Claran](#); [O'Boyle, Jody](#)
Subject: Electricity distribution and transmission connections policy - call for evidence
Date: 06 December 2016 15:51:48

Hi Claran & Jody,

I have been pointed toward the above consultation by Roger Henderson of NIE Networks, and I have 3 comments I would like to put forward for consideration:

1. We were recently involved as consultants on a PV generation project in NI (please note that my contact is one which is completely independent of that project, or the developer). Essentially as part of our work we were asked to perform some ER G5/4 harmonic studies. As the site connected at 33kV, these studies were to be in accordance with a so called 'stage 3' assessment. In order to perform accordingly we are required to use some NIE system data so that we can search for the worst possible NIE outage condition, and so that we can check that the harmonic levels on the NIE system are within the limits defined by the standard. On this occasion we were not able to get the data in a readable format, or at least a format which would be readable on anything other than the NIE DINIS power system analysis software. Consequently, the developer had to go to an alternative consultant who had the capability, but charged a premium for using the DINIS software.

When we are working on sites in GB, each DNO has a licence requirement to publish their network data on their website (condition 25 of the licence <https://epr.ofgem.gov.uk/Content/Documents/Electricity%20Distribution%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current%20Version.pdf>). However, I cannot find a similar requirement for NI. Nevertheless, I feel that not having the data in a usable generically readable format will act to push up the cost of generation connections, and does not promote competition, which is required in the NI distribution licence. We note that following discussions with NIE, that they are in the process of moving to a new software package which will allow better data transfer (via the universal CIM format), although the timeline is unclear. However, I also think there would be benefit to have a requirement to publish the data to ensure that it is readily available for consultant work – in a similar document to the Long Term Development Statement (LTDS) published by DNOs in GB.

2. Our second point is that there would be benefit in clarifying the technical power system studies required to be performed by developers. This isn't specifically listed anywhere, but for clarity and ease of connection it would be beneficial, particularly for new entrants, to have a list of requirements either in the grid and distribution code or the settings schedules.
3. Finally, there is quite a confusing mismatch between the distribution code, grid code and the two settings schedule documents. Essentially we can have (and have had) a situation where the site is above 5MW but is distribution connected. Therefore, the setting schedules document referred to is the one >5MW which is more geared towards the grid code. We think there is need to align all of these documents clearly. Furthermore, it may be worth considering:
 - a. Making the setting schedules part of the grid and distribution codes respectively (so that they are appropriately governed and managed)
 - b. Changing the name and contents so that it doesn't just refer to wind farms (although I believe that this is already in progress...)

I hope that these requests fall within the scope of the consultation. If we can be of any further assistance in clarifying the above then please do not hesitate to contact me.

Best regards,
Jonathan

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