| Respondent Details | |
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| **Company Name:** | **Northern Ireland Renewables Industry Group (NIRIG)** |
| **Respondent Name:** | **Meabh Cormacain** |
| **Designation:** | **Policy and Communications Coordinator** |
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| No. | Question | Your response | Consent to Publish Response (Y/N) |
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| **Q1** | **How would you define 'contestability'?** | Contestability is the right for a third party connecting to the grid to plan, design and construct all or part of their grid connection or other services such as offshore transmission assets. The network owner/operator is responsible for the specification of standards and is often responsible for adopting the assets and ongoing operation and maintenance. | **Y** |

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| **Q2** | **What do you see as the main benefits of introducing contestability in new connections:**<br>**A) To the consumer?**<br>**B) To your company?** | A) Improvements in the timely delivery of renewables projects, therefore expediting costs savings to the consumer through the reduction in the wholesale electricity price, as Regulatory Authority studies have shown. In terms of the NIAUR cluster charging policy, contestable delivery of shared connection assets may also transfer asset funding risk from customers to developers. An additional benefit could be the freeing up of NIE resources.<br>B) More efficient and effective delivery of assets will increase the ability of our members to build-out the renewables required to meet the Northern Ireland targets. | **Y** |
| **Q3** | **What is the nature of your company's business?** | The Northern Ireland Renewables Industry Group (NIRIG) is a joint collaboration between the Irish Wind Energy Association and RenewableUK. NIRIG represents the views of the large and small scale renewable electricity industry (wind, wave and tidal) in Northern Ireland, providing a conduit for knowledge exchange, policy development support and consensus on best practice between all stakeholders in renewable energy. | **Y** |
| **Q4** | **What is your role in making new connections to the electricity network...**<br>**A) At present?**<br>**B) In the future?** | NIRIG represents the renewables industry voice in engaging in renewables-related policy-making, with the aims of developing robust, efficient and effective policy for the facilitation of a low-carbon future. | **Y** |
| **Q5** | **What past experience do you have in making new connections to the electricity network...**<br>**A) in Northern Ireland?**<br>**B) or elsewhere? (Please state location)** | NIRIG members have significant experience in making new connections to the electricity network in Northern Ireland, across the UK and Ireland and further afield. The breadth and diversity of the experience of our members means that our industry group is ideally placed to work alongside stakeholders in developing the processes and policies to implement effective and efficient contestability. | **Y** |
| **Q6** | **What type of connections are you interested in?** | | **Y** |
| **Q7** | **Should contestability be applied to:**<br>**A) Transmission and distribution connections?**<br>**B) Onshore and offshore connections?** | A) Yes<br>B) Yes.<br>We believe that establishing an a la carte menu of works that are open to contestability will deliver far greater flexibility and benefits than prioritising one particular technology or scale of project over another. | **Y** |
| **Q8** | **To what extent should different rules apply to Transmission Network Operators and Distribution System Operators?** | The same regulatory and commercial rules and principles should apply to both. | **Y** |

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| **Q9** | **To what extent should different rules apply to offshore connections and onshore connections?** | Offshore connections should not be treated any differently to onshore connections. NIE and SONI must produce and publish functional specs as early as possible in the process of introducing contestability and work alongside NIAUR and industry in the development of these. | **Y** |
| **Q10** | **What industry codes would require updating to facilitate contestable connections?** | NIE and SONI statement of charges would need updating to cover the commercial and regulatory aspects of contestability. A clear procedure would need to be developed and we note that in ROI the CER approved a paper entitled 'Contestability on the Distribution System - ESB Networks key Principles and Processes Paper' which would be a useful template. Details must include key principles, boundary definitions, interface with network owner/operator, responsibilities of customer and network owner/operator, functional specs, design reviews, construction, commissioning, O&M and asset transfer. | **Y** |
| **Q11** | **What works should be deemed as non-contestable?** | Certain limited works and assets that, due to their location, cannot be safely separated from existing 'live' Transmission or Distribution System. Certain works and assets that are required for system protection and communication | **Y** |
| **Q12** | **How should operations and maintenance be managed during the lifetime of a contestable asset?** | Through a system of standard transparent maintenance charges and task intervals paid by generators to the network operator/asset owner. Where the ownership of assets are considered for contestability then the O&M should be managed by the owner. | **Y** |
| **Q13** | **Should different degrees of contestability be introduced for each connection type?** | Contestability should be introduced for dedicated and shared connection assets at all voltage levels (with the exceptions noted in Q11). In circumstances where the dedicated works do not form an integral part of the wider system then the ownership of the assets should also be contestable. | **Y** |
| **Q14** | **What are the barriers to introducing contestable connections?** | There are no significant barriers, However, additional resources will be required in NIE, SONI and NIAUR in order to develop the rule sets and functional specs, and ensure rapid progress in order to meet the NIAUR deadline of March 2015. We also urge that the introduction of contestability should not slow down ongoing non-contestable works and resourcing must be managed to ensure that this does not happen. To allow for the timely introduction of contestability NIE and SONI should start work on functional specs in parallel with the development of the commercial and regulatory rules for contestability. | **Y** |
| **Q15** | **What is the current impact of not having contestability in the connections market?** | NIE have a growing work load to deliver all the connection works to connect the renewable generation required to meet the 2020 target. If implemented correctly, therefore, it should reduce the increasing work load on NIE. Furthermore, without contestability there is limited ability of generators to control or reduce the connection cost and timelines of the grid connection works. This affects investor confidence. Currently there is inequality with ROI in the SEM | **Y** |

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| **Q16** | **What is your view of best practice in regard to contestable connections?** | There is considerable experience on the delivery of contestable connections in Britain and RoI. In RoI the majority of transmission generator connections are delivered contestably and a growing number of distribution connection opt for contestability. ESB, EirGrid and the renewable industry in RoI have been through a learning curve on contestability. Best practice from across GB and ROI should be considered and in NI it is essential not to reinvent the wheel. | **Y** |
| **Q17** | **What type of arrangements would achieve the right balance between contestable and non-contestable works?** | See questions 11 and 13. We also note that there should be no delays in the delivery of non-contestable connections as a result of the introduction of contestability. | **Y** |
| **Q18** | **What problems could arise from the introduction of contestability?** | Problems will only arise if the coordination and will to deliver contestability are lacking. Three key areas that require attention in order for successful delivery are: the production of clear and timely functional specs, close coordination between TSO and DSO in the preparation of these specs to prevent problems at interfaces, and a clear design review and quality assurance process for assets to be handed back, with defined timelines. We urge that there be adequate resourcing of both NIE and SONI to allow the delivery of non-contestable connections alongside developing the rules, process and functional specifications required for contestability. | **Y** |
| **Q19** | **How much of a factor is the cost/timing of a new connection in regards to setting up a business/generator?** | Critical - particularly in NI where planning permission is required an application can be made for a grid connection for onshore developments. It is of particular importance at this juncture given that uncertainty about market and support systems across the UK and all-Ireland market in 2017 is creating considerable pressure to deliver before then. Contestability will give the generator greater control over the timeline for the delivery of the grid connection works and increase the likelihood of managing and reducing connection costs. | **Y** |