

NIRIG response to NIAUR NIE Medium Term Plan Phase 2 Proposed Decision

18th January 2013

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 energy industry in Northern Ireland, providing a conduit for knowledge exchange, policy development support and consensus on best practice between all stakeholders in renewable energy. NIRIG welcomes the opportunity to respond to the NIAUR NIE Medium Term Plan Phase 2 Proposed Decision. NIRIG believes that progress towards the Northern Ireland Strategic Energy Framework targets of 40% electricity from renewable sources by 2020 requires timely, strategic and efficient infrastructure delivery. We further believe that only through such infrastructure delivery will maximum benefit be derived from Northern Ireland's significant renewable energy resources.

NIRIG welcomes the NIAUR proposal to approve NIE funding requests for:

- £2.6m to increase the rating of the Kells to Coleraine circuit by installing higher capacity conductor at critical spans
- £25.2m to install additional capacity at the Tamnamore sub-station

We understand from the accompanying FAQ and constraint analysis that maximum benefit will be achieved if all three projects are progressed as only then will firm capacity for 700MW of renewable generation be accommodated in the North-West region, with little constraint costs.

Therefore, while we also welcome the 'in principle' approval of £16.0m to install a third circuit between Omagh and Tamnamore we believe that final approval of this project should be expedited. We do not think that this should be delayed until the completion of the final detailed design including designated pole positions, since in practice pole positions often have to be moved during the construction phase. We are of the view that approval should be made as soon as there is sufficient visibility of project costs to allow the decision, and that there is no need for further consultation.

We also note that there are no clearly defined dates for completion of these projects. It is important to improve confidence in the delivery of this key infrastructure as soon as

possible. A rapid turnaround of all three projects is also necessary if inclusion in this years' transmission outage programme is to be achieved. NIRIG would recommend exploration of mechanisms whereby NIE could be encouraged to work to more specific timeframes for infrastructure delivery, although we recognise that there could be inherent difficulties in such an approach.

Section 5 of the consultation deals with the impact on consumers. NIRIG understands this to be an illustration of the costs only, and not a cost-benefit analysis of the projects. Nor do we see this as a benchmark for any future cost-benefit analysis. We would welcome clarification on this matter.

We hope that this submission is of use and welcome the opportunity to respond.

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