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To Brian Mulhern
NIAUR
Electricity Directorate
Queens House
14 Queen Street
Belfast
BT1 6ED

22nd May 2013

REI response to NIAUR Offshore consultation

Connection Arrangements for Offshore Renewable Generation

We feel it is important that Northern Ireland developers operate under a regime that does not in any way confer to them an unfair or discriminatory competitive disadvantage. For example, any differences which confer a disadvantage in comparison with GB projects must be reflected appropriately in the strike price.

We feel that to ensure fair and equitable treatment for all technologies and to respect the connection queue order, that all generators (including offshore generators) should enter the FAQ allocation process when they make a generation connection application, that is, once they have received the necessary DOE/DETI consents, as is currently the situation for on-shore projects in Northern Ireland. This would ensure a consistent point of entry onto the FAQ list for all technologies, and we feel that this principle

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would not discriminate against other projects or technologies. We feel that our position is further justified by the fact that onshore wind energy developers will have committed a significantly higher level of spend to bring the onshore project through planning, compared with the offshore developers who want to take a position in the connection queue (FAQ list) before they have committed investment in the consent process.

REI would like to thank the NIAUR for giving us an opportunity to respond to the above consultation. We would like to make the following comments;

REI recommend that given the complexity and variety of issues raised within this consultation, different elements of the consultation should be separated out for the purposes of expediting decisions, where possible. For example, the questions surrounding ownership and unbundling could be treated separately from grid connection application issues, such that a degree of certainty can be provided in those areas as soon as possible to developers.

REI feels that developers need to be able to plan for and manage the delivery of the connection to the Northern Ireland transmission network, both in terms of design and construction of the connection assets. The recommendation for this approach is based both on the experience gained from the RoI and GB markets and also acknowledges developers' requirements to deliver against milestones that are contractually imposed. We feel that distribution connections should be permitted to be built contestably to the required electricity industry standards.

Sincerely Yours,

A handwritten signature in black ink that reads 'Andrew McCrea'.

Andy McCrea
Senior Grid and Markets Manager
Renewable Energy International