

Renewable Energy Systems Limited

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Jody O'Boyle Utility Regulator Queens House 14 Queens Street Belfast BT1 6ED

Email: electricity network reporting@uregni.gov.uk with cc to jody.oboyle@uregni.gov.uk

Dear Jody O'Boyle

RE: RES Response to: "Utility Regulator consultation on the Proposed Modifications to NIE Networks Transmission and Distribution Licences for Capex Connection Costs on a pass-through basis" dated 19 September 2019

RES is the world's largest independent renewable energy company active in onshore and offshore wind, solar, energy storage and transmission and distribution. At the forefront of the industry for over 35 years, RES has delivered more than 16 GW of renewable energy projects across the globe and supports an operational asset portfolio of 5 GW worldwide for a large client base.

From our office in Larne Co Antrim, RES has been at the forefront of wind farm development in the Republic of Ireland and Northern Ireland since the early 1990s. RES also has a growing portfolio of solar and energy storage projects across Ireland.

RES wants to be a part of Ireland's energy future, ensuring that our projects contribute to decarbonising our electricity system to the least cost to the consumer. We consider ourselves well-placed, therefore, to comment on the important issues addressed in this consultation and welcome this Utility Regulator consultation on the Proposed Modifications to NIE Networks Transmission and Distribution Licences for Capex Connection Costs on a pass-through basis.

We note the Utility Regulators proposals to amend NIE Networks' Transmission and Distribution licences to enable NIE Networks to submit pass-through Capex projects for approval by the Utility Regulator in relation to the recovery of costs incurred by NIE Networks in respect of distribution/transmission connections which are not otherwise recoverable by NIE Networks through any other means or mechanisms. We consider this proposal to represent a pragmatic way forward that will protect confidence of those considering investment in new electricity generation in Northern Ireland. Much of this new generation will be mature renewables, such as onshore wind, which is now the cheapest form of commercial scale electricity generation currently available to the All Island electricity system. The Utility Regulator's proposal will therefore be in the best interest of the Northern Island consumer through a measure that will help to promote effective competition in electricity generation. For this reason, RES supports the proposal.

Yours faithfully

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