



Renewable Energy Systems Limited
Willowbank Business Park, Millbrook, Larne
Co. Antrim BT40 2SF, Northern Ireland
www.res-group.com

Ciaran Maccann
UREGNI
14 Queen Street
Belfast
BT1 6ED

Sent via e mail: ciaran.maccann@uregni.gov.uk

Our Ref: RES – SONI PC DD

14 September 2020

Dear Sir/Madam,

SONI Price Control 2020-25 – Draft Determination

RES is the world's largest independent renewable energy company with operations across Europe, the Americas and Asia-Pacific. At the forefront of renewable energy development over 38 years, RES is responsible for more than 18GW of renewable energy capacity and energy storage projects worldwide. RES is active in a range of renewable energy technologies including onshore wind, offshore, solar and energy storage.

Since developing our first onshore wind farm in Northern Ireland in the early 1990s, RES has subsequently developed and/or constructed 22 onshore wind farms. This equates over a quarter of Northern Ireland's onshore wind capacity. RES currently operates over 100MW of wind capacity across Northern Ireland, has secured planning permission for a further 60MW either under construction or awaiting construction and has approximately 120MW in the planning system. In addition, RES has a very strong onshore wind pipeline in Northern Ireland.

We welcome this opportunity to respond to UREGNI draft determination of the SONI Price Control 2020-25 (6 July 2020).

RES wants to play an active part in Northern Ireland's energy future, ensuring our projects contribute to decarbonising the energy system at least cost to the consumer, in line with our vision to be a leader in the transition to a future where everyone has access to affordable zero carbon energy. We also want to play our part in delivering the green recovery from the inevitable economic downturn imposed by the Covid-19 global pandemic.

Bringing about a market lead green recovery and setting a path towards Net Zero by 2050 requires stimulus from key stakeholders and market operators and that stimulus needs to happen now. It is therefore disappointing that UREGNI has proposed not to fund critical areas of SONI activity, such as industry collaboration, DS3 evolution and system control enhancement that are essential if SONI is to facilitate the transition to net zero.

We also understand that, in many areas, UREGNI has made release of funding conditional upon the outcome of assessment via uncertainty mechanisms. In principle, we support the use of uncertainty

mechanism as a means of offering value for money to the Northern Ireland consumer whilst permitting flexibility to allow SONI to make investments when the time is right. However, we are concerned that UREGNI has placed an over reliance on uncertainty mechanisms risking delay of delivery new renewable and flexibility projects that are critical to setting the path towards net zero.

Please feel free to contact me if you have any further questions or require more information on the evidence we have provided.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'P. Smart', enclosed within a thin black rectangular border.

Patrick Smart
Energy Networks Director
E patrick.smart@res-group.com
T +44 191 3000 452