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Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

Our Ref: DV01-003579

10 January 2011

Dear Sir/Madam,

Re: RES Response to the Utility Regulator's Consultation on Electricity Connection Policy to the Northern Ireland Distribution System

RES UK and Ireland Limited is part of the RES group of companies. RES has been developing wind projects on the island of Ireland since the early 1990s, having developed 13 operating wind farms and 1 single turbine in Northern Ireland and four operating wind farms in the Republic of Ireland, totalling over 241MW. RES currently owns or operates over 134MW of wind capacity across Ireland. In addition RES has a further 35MW in construction or with planning consent in Northern Ireland.

We are pleased to have the opportunity to respond to the Consultation on **Electricity Connection Policy to the Northern Ireland Distribution System** and wish to place on record our support for the response provided to you by The Northern Ireland Renewables Industry Group (NIRIG) of which RES is a member.

We also wish to make the following comments in additional to those provided in the response by NIRIG:

The definition of "connection assets" and associated costs

Whilst we support the shallow connection policy, we propose a thorough review to ensure that reduced connection charges are not outweighed by increased network use of system charges.

Grid Code and Trading and Settlement Code Costs

Whilst we support the reflection of all connection costs in a transparent manner, we would like to note that the way in which testing is currently structured imposes significant costs to generators. We propose that in tandem with any changes, a review of how testing is undertaken is carried out to minimise costs including the adoption of (i) type testing of wind turbines and wind farm control systems and (ii) usage of data collected via monitoring; so as to avoid some Grid Code tests.

If you wish to discuss further any comments made in this response please do not hesitate to contact RES.

Yours sincerely,

Lucy Whitford

Head of Development - Ireland

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