

Dear Albert / Sarah

I would like to make the following points in contribution to your consultation:-

9. The issue of the time taken by NIE to turn around connection quotes is in our opinion the most important one that need to be addressed. We have two renewable generation projects operating in NI, one awaiting connection and two for which we are awaiting on NIE to complete studies and provide quotes. On all projects we have been delayed significantly by NIE. We understand the difficulties and the limited resources however this bottleneck is costing NI dearly when we should be making investments and creating employment. We are not held back by a lack of investment, opportunities or the technology rather it is the ability to connect projects and the time this takes. Our projects have generated work for NI contractors and created direct high quality employment. For the sake of a few more people at NIE processing connection offers we could do much more. We are happy to pay a reasonable and fair price for this service. NIE need to be incentivised for the sake of the NI economy.
- 11.1 Charging 100% of O&M costs with the connection charge for generators is in our opinion unfair. The connection costs of a generation project are the hardest to finance. It can not be asset financed and is often required to be paid in full at the start of a project construction period well in advance of any income being generated by the project. High connection charges have a disproportionate impact on the ability of developers to finance projects. Connection charges should not be increased by charging O&M all up front. We would much prefer the option for O&M charges to be spread over the life of an asset.
- 11.3 We would favour the ability to undertake connections on a contestable basis. We would caution however that any contestable process needs to be fair and easy to use. We are just completing a contestable connection in Scotland on Scottish Power's network and have found their system to be loaded against the developer almost as if it is intended to discourage or punish those choosing the contestable route.

The comments made above, although specific to NIE, could be made about other network operators in the UK. Making the connection of generation projects to the NIE network easier and quicker can we believe only benefit the NI economy.

Regards

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