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Modifications to Transmission Interface Arrangements (TIA) between NIE and SONI resulting from the implementation of the Third Energy Package

Dear Leigh,

SSE welcomes the opportunity to comment on the modifications proposed to NIE and SONI's Transmission Interface Arrangement. SSE currently operates 87MW of onshore wind generation in Northern Ireland, with a number of other projects in development. We would make the following comments on the modified TIA:

Timelines in Section D

The change in timelines for a **Construction Application** to be submitted to NIE is relatively substantial. While SONI should have time to prepare **Construction Applications** that are deemed effective by NIE, justification for the change in timelines should be provided.

2.2 If SONI considers it may be necessary for a **Construction Project** to be undertaken, it shall submit:

2.2.1 a notification of receipt of a **User Application** to NIE as soon as reasonably practicable, providing information on location, the required export or import capacity and the requested connection date; and

2.2.2 a **Construction Application** to NIE as soon as reasonably practicable, and in any event within ~~twenty-five~~ **three** Business Days of the **User Application Date** or an **Rol TSO Application Date**.

The increase in **Construction Application** timelines appears to be partially reflected in a reduction in the time period in which NIE has to submit notification of a **Construction Offer**, but in general, the time periods for processing appear to have been extended by both parties.

Connection Arrangements

The transfer of transmission planning functions from NIE to SONI affected by these modifications is a welcome development. However, SSE would note that without the introduction of contestability for transmission level connections, SONI (and all system users)

are dependent on ESB for physical connection to the system, as noted in the European Commission's decision paper on certification¹:

"The framework for the processing of new connections is laid out in detail in a regulatory approved transmission interface agreement between SONI and NIE. SONI is responsible for interactions with system users. The planning and the actual physical connection to the system is effected by ESB², overseen by SONI."

These issues with transmission connection arrangements cannot be addressed by modifications to the TIA. We assume that they will be dealt with in the Utility Regulator's consultation on arrangements for contestability, although the Project referenced in the Forward Work Programme³ only appears to refer to connections at a distribution level.

I hope our comments are helpful; if you need any further clarity on the points raised in this response, do not hesitate to contact me.

Yours sincerely,

Connor Powell
Regulation, SSE (Ireland)

¹ European Commission (2013), Commission Decision pursuant to Article 3(1) of Regulation (EC) No 714/2009 and Article 10(6) of Directive 2009/72/EC – United Kingdom (Northern Ireland) – SONI/NIE

² The vertically integrated owner of NIE

³ Utility Regulator (2014), Draft Corporate Strategy 2014-19 and Forward Work Programme 2014-15