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Northern Ireland's Only One-Stop Solar Specialist

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INSTALLATION CLEANING SERVICE & REPAIR
UPGRADES MONITORING BATTERY STORAGE
SHOP

15th May 2017

**RESPNOSE TO UTILITY REGULATOR CONSULTATION ON DISTRIBUTION & TRANSMISSION
CONNECTION POLICY**

Dear Sir,

Our response to the consultation possibly differs from the majority of stakeholders as we are a solar pv installation company, involved in mainly the microgeneration market for domestic & small commercial clients and covering all of Northern Ireland and the Republic of Ireland.

Since the closure of the NIROCS incentive scheme in March 2017, we have seen a huge increase in domestic and small commercial solar pv generators wishing to add battery storage to their existing installation. We have also see a fair amount of interest from housebuilders, both volume and one-off who are keen to explore the possibility of utilising battery storage without solar in conjunction with off-peak electricity tariffs to provide electricity & heating requirements.

Typically the existing generators who have expressed a desire to add battery storage are exporting a high percentage of their renewable generation which is no doubt adding to some of the capacity issues noted in the consultation.

Unfortunately to date, we have been unable to offer a viable storage option to these clients due to the following issues:

1. Outdated grid connection standards – We first tried to bring a Samsung AC coupled battery storage system to Northern Ireland 3 years ago and more recently, we invested a significant amount of time & effort to gain accreditation as a Tesla Energy installer which enables us to supply & install the much anticipated Tesla Powerwall

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storage battery. Both manufacturers offer G83/2 and G59/3 settings & certificates for their product and while they are keen to offer their products to clients in Northern Ireland, both manufacturers have pulled out of Northern Ireland for the time being as it is not economically viable to obtain G83/1NI or G59/1NI test certificates for such a small market. While this is a major blow to ourselves and clients in Northern Ireland, it is understandable as there are bigger markets in Europe vying for their grid connection standards to be offered.

2. No fast track process for battery storage – another key problem for us is that currently in Northern Ireland, an application to install battery storage is looked upon in an identical way as someone wishing to connect a generator to the grid. If we take the Tesla Powerwall battery as an example, currently the battery can be set to either G83/2 which limits charge/discharge to 3.68kw or G59 which allows the battery to charge/discharge at a peak of 7kw for 10 minutes or 5kw continuously. Even if the G59/3 standard was permitted in Northern Ireland, a client wishing to connect a Tesla battery and use the full 5kw charge/discharge power would have to adhere to the normal G59 application process which involves the cost of the application, a lengthy wait and considerable administration. In stark contrast to this, the majority of UK DNO's have already agreed a 'fast Track' G59 application process for battery storage on domestic/small commercial projects which involves 5 days prior notice of the installation and zero cost. Even if the G83/1-NI certification was offered by the manufacturer, the client would still have to submit a G83/1 Stage 2 application which bears no cost but involves a 3 month wait for the outcome.

The result of the current scenario (which is similar in the Republic of Ireland) is that Northern Ireland and Republic of Ireland will be some of the only countries in Europe without the Tesla Powerwall battery or similar. In my opinion this doesn't make sense as, unlike other forms of grid connection, the battery will not place any further strain on the grid from either an import or export point of view but rather is a way for existing generators to minimise their grid export and maximise self-consumption thus helping in some way to even out the current disparity in the grid and further reduce carbon emissions which should be the ultimate aim of renewable technology.

With the sharp decline in business for renewable installers following closure of the various incentive schemes in Northern Ireland, unless something is done to encourage and facilitate battery storage in the short term, those involved in the industry will be forced to cease trading and move on to something else, taking with them the knowledge, experience and drive to roll out a successful battery storage industry in Northern Ireland.

Another fear is that if nothing is done, this will leave the door wide open for unscrupulous installers to source and install unsuitable battery storage systems without any adherence to local grid connection standards or involvement with NIE which will cause more problems in the grid than we already have.

My suggestion, as is touched on in the consultation is that battery storage be looked upon as a totally separate entity to other types of grid connection and some thought given as to how we bridge the gap between current grid connection standards & application process in Northern Ireland and the battery technology which is currently available.

If NIE were permitted/willing to undertake any sort of pilot programme for a limited amount of battery storage installations in the near term, the majority of battery technologies currently available come with advanced internet monitoring facilities which would let any stakeholders involved monitor the battery system's impact on grid import/export and the client's consumption.

Kind regards,

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Director

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