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Monday, 21 October 2019

**BY EMAIL ONLY**

Dear Mr O'Boyle,

**Re: TCI Renewables response to UREGNI consultation on Proposed Modifications to NIE Networks Transmission and Distribution Licences for Capex Connection Costs on a pass through basis of 19 September 2019**

TCI Renewables Limited ("TCI") welcomes the opportunity to respond to the above referred to UREGNI Consultation. The proposals set out in the Consultation, to enable Northern Ireland Electricity Networks ("NIEN") to recover, by way of capex pass through allocated to its RAB, any costs payable by it to SONI for use of shared connection assets, which have been paid for by a third party transmission connectee are necessary and welcome.

The modifications are of particular interest to TCI as a party (via it's then 100% owned subsidiary Brockaghboy Windfarm Ltd) who has previously paid the full cost of such shared connection assets to SONI but has not yet received a proportionate cost share reimbursement, notwithstanding that SONI has issued a connection offer to NIEN Distribution for the connection of the Agivey cluster substation to the Transmission System.

TCI would expect NIEN Distribution to submit a request for approval to UREGNI for an amount equal to the Use of Shared Asset Charge to be added to its RAB immediately upon earlier of (i) the acceptance of the connection/works offer referred to above, or (ii) the outcome of this Consultation / giving effect to the necessary Licence modifications. This would allow SONI to meet its contractual obligations to issue a reimbursement for any existing transmission assets that have already been funded on a shared use basis by existing transmission connectees. The proposals set out in the Consultation should of course also apply in circumstances where SONI and NIEN Distribution is treating the connections as simultaneous for charging purposes.

If you have any queries or comments on this response, please contact the undersigned by return.

Yours faithfully,



**Peter Craig**  
Director

for and on behalf of TCI Renewables Limited