

Respondent Details

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No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	How would you define 'contestability'?	Contestability is when an applicant for a connection can opt to carry out part or all of the work required to make their connection to the network, short of the final act of connection, using his own or 3rd party resources, independently of the network owner (NIE). The specification of the work, equipment and materials would be of a standard defined by the network owner (NIE in this instance) who would adopt the assets on completion taking ongoing responsibility for operation and maintenance	Y
Q2	What do you see as the main benefits of introducing contestability in new connections: A) To the consumer? B) To your company?	Simple Power as a developer and hence a customer of NIE, would benefit through shorter connection timescales, more efficient construction, fewer inefficiencies through missed target dates and wasted time on site (Simple Power estimates that time on site could be halved), better co-ordination with civil contractors and turbine manufacturers; all of which will contribute to reduced connection costs. Avoiding NIE's labour costs, bought in services costs and significant overhead charges will also be a substantial help to developers and ultimately lower costs feed through to customers via lower renewables support and/or to communities via higher rental payments. The general body of electricity customers will see benefits in NIE resources being freed up to work on other areas, also an increasing contribution to meeting government renewables targets.	Y
Q3	What is the nature of your company's business?	Simple Power is a home grown company that works with farmers and landowners to plan, fund and construct single, medium scale wind turbines. Land rental payments provide landowners with a regular monthly income for at least 25 years. Also, the OREAP report acknowledges the contribution of small scale renewables to government renewables targets.	Y
Q4	What is your role in making new connections to the electricity network... A) At present? B) In the future?	As CEO I work directly with NIE right from the connection application, through the pre-construction process, the construction process, ending with connection and commissioning. I also have to liaise with civil contractors and turbine manufacturers as regards project plans including site works and turbine installation , commissioning and testing.	Y
Q5	What past experience do you have in making new connections to the electricity network... A) in Northern Ireland? B) or elsewhere? (Please state location)	In Northern Ireland Simple Power has 10 installations connected, 31 offers accepted awaiting construction/connection, 14 offers being processed and 45 conditional offers. As a company we have significant experience of the process and technology.	Y
Q6	What type of connections are you interested in?	Small scale generation connections to the distribution network.	Y
Q7	Should contestability be applied to: A) Transmission and distribution connections? B) Onshore and offshore connections?	The reasons for introducing contestability apply for all types of connection. Furthermore, there does not appear to be any technical reason for not introducing contestability for connections at all voltage level.	Y
Q8	To what extent should different rules apply to Transmission Network Operators and Distribution System Operators?	Although the principles are likely to be the same, the rule set for distribution, particularly for small scale generation, should be very simple, as outlines in Q13.	Y

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Q9	To what extent should different rules apply to offshore connections and onshore connections?	No Comment.	Y
Q10	What industry codes would require updating to facilitate contestable connections?	We assume there will be a new document dealing with contestability including a dispute resolution process. Likely the Statement of Charges would need to be altered.	Y
Q11	What works should be deemed as non-contestable?	A simple rule could be that work on the existing NIE network would be non-contestable.	Y
Q12	How should operations and maintenance be managed during the lifetime of a contestable asset?	The assets would be built to standards defined by NIE who would then adopt the assets and be responsible for their ongoing operation and maintenance over their lifetime. O & M charges would apply as currently.	Y
Q13	Should different degrees of contestability be introduced for each connection type?	Small scale generation connection jobs will normally consist of some combination of 11kV overhead line work (possibly including tree-cutting), 11kV underground cable work and distribution substation work (including civil works). Simple Power believes that NIE is best placed to carry out overhead line work but the underground cable work and substation work should be contestable. Simple Power also believe that NIE are best placed to carry out the pre-construction work including detailed design (survey), wayleaves, planning permission, earthing design and legalities. This would mean that contestability for small scale generation would be very simple to introduce. This type of simple approach is unlikely to be appropriate for large scale onshore and offshore developments.	Y
Q14	What are the barriers to introducing contestable connections?	The only barrier to introducing contestable connections would be if the 3 main stakeholders, NIAUR, NIE and SONI, don't commit resources and effort into making it happen in a timely manner.	Y
Q15	What is the current impact of not having contestability in the connections market?	Timescales are long, firm connection dates are not provided, costs are much higher than they need to be. These factors currently hinder the growth of small scale generation. Currently there is inequality with ROI in the SEM. So far, an opportunity has been missed of introducing a further measure of competition in NI.	Y
Q16	What is your view of best practice in regard to contestable connections?	Contestability has already been introduced in ROI and in GB so there should be significant experience and good practice in those domains.	Y

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Q17	What type of arrangements would achieve the right balance between contestable and non-contestable works?	See Q11 and Q13.	Y
Q18	What problems could arise from the introduction of contestability?	Within whatever rules are established developers should have as much flexibility as possible as regards what work they wish to undertake and what materials and equipment they utilise, within the specified technical standards. Also, NIE should be working in parallel with this process to establish equipment specifications and other appropriate standards and guidelines so that the time to implementation is minimised.	Y
Q19	How much of a factor is the cost/timing of a new connection in regards to setting up a business/generator?	The cost and timing of new connections are 2 of the most important factors for a developer of small scale generation. For small scale generation the cost of connection often approaches a similar cost to the turbine installation.	Y

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I1-1	Describe your issue	Currently it is impossible to get a firm date for connection from NIE.	Y
I1-2	How often does this issue arise?	This issue arises with every connection.	Y
I1-3	Where does the issue arise?	When a job in 'clear to construct', all the timing uncertainties around wayleaves/planning etc have been removed, NIE should make a firm commitment to a connection date.	Y
I1-4	What more could be done to deal with the issue?	The requirement for NIE to provide a firm connection date should be included in formal documentation such as the Statement of Charges.	Y
I1-5	Why can't the issue be dealt with or what are the barriers to implementing change?	NIE is reluctant to provide firm connection dates and have no real incentive to do so.	Y
I1-6	How has delivery of your connection been affected by this issue?	It is very difficult to co-ordinate site works, including turbine delivery and installation without a firm connection date.	Y

No.	Question	Your response	Consent to Publish Response (Y/N)
I2-1	Describe your issue	As NIE progress jobs through the 'pre-construction phase' estimated dates for connection continually slip with no clear explanation.	Y
I2-2	How often does this issue arise?	Regularly with most connections.	Y
I2-3	Where does the issue arise?	During the pre-construction phase of jobs which includes survey, wayleaves, possibly planning permission, earthing design, legalities.	Y
I2-4	What more could be done to deal with the issue?	NIE should publish target timescales in the Statement of Charges for pre-construction activities such as survey, wayleaves, planning, earthing design, legalities. While it is accepted that problems might arise on individual jobs the majority should be progressed to target timescales.	Y
I2-5	Why can't the issue be dealt with or what are the barriers to implementing change?	NIE's reluctance to agree to target timescales to be measured against. Also, a number of resources have recently left the company and filling the gaps left may have an adverse impact on this area. NIE have no real incentives to improve other than to avoid complaints.	Y
I2-6	How has delivery of your connection been affected by this issue?	Turbines have a lead time of a number of months from ordering to delivery. When estimated dates for connection continually slip it is impossible to achieve efficiency when procuring turbines.	Y

No.	Question	Your response	Consent to Publish Response (Y/N)
I3-1	Describe your issue	Time to provide a quotation (90) days and time to provide the actual connection (anything between 12 mths and 24 mths)	Y
I3-2	How often does this issue arise?	Every job.	Y
I3-3	Where does the issue arise?	Throughout the process of delivering a network connection.	Y
I3-4	What more could be done to deal with the issue?	90 day target progressively reduced to 60 days. Target timescales or overall standards for typical jobs ie NIE to deliver ? % of certain types of jobs within defined timescales.	Y
I3-5	Why can't the issue be dealt with or what are the barriers to implementing change?	NIE have no incentive to improve timescales other than to avoid complaints.	Y
I3-6	How has delivery of your connection been affected by this issue?	The longer a job is ongoing the more costs it attracts. Also, installations could be generating and earning revenue much earlier than currently is the case.	Y