

**Respondent Details**

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No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	How would you define 'contestability'?	Contestability is the right of a third party connecting to the grid to plan, design and construct all or part of their grid connection. The connection is built to the specification/standards set out by the Network Operator/Owner. The Network Operator is then responsible for adopting the assets, on-going operation and maintenance of the adopted asset.	y
Q2	<b>What do you see as the main benefits of introducing contestability in new connections:</b> <b>A) To the consumer?</b> <b>B) To your company?</b>	A) The consumer will benefit from reduced wholesale electricity prices as Electricity Generators will be able to connect faster than the current NIE timelines, and at a reduced cost. Therefore the customer will inevitably benefit as a more competitive approach is taken. This has been supported by Regulatory Authority studies. A benefit to NIE would be that resources formerly used for these connections could be deployed elsewhere within the business. Additionally the customer will benefit by having the opportunity to source energy from renewable resources. B) Lightsource will benefit as currently there are no standard timelines or costs for connections from NIE. Therefore this presents challenges in assessing the feasibility or business case for a project. If contestability is introduced it will enable developers to have greater certainty and control on project costs and timelines. Thus encouraging development in Northern Ireland as a new market and supporting Northern Ireland meet renewable targets.	y
Q3	What is the nature of your company's business?	Lightsource is the UK's largest solar power developer with over 600MWp currently under operation in the UK. We are looking to develop similar large scale projects in Northern Ireland and have identified a significant pipeline.	y
Q4	<b>What is your role in making new connections to the electricity network...</b> <b>A) At present?</b> <b>B) In the future?</b>	A) As above, Lightsource have connected over 600 MWp of Solar energy in the UK across multiple Distribution Network Operators. B) This year we are working towards achieving 1 GW of connections by the end of the year.	y
Q5	<b>What past experience do you have in making new connections to the electricity network...</b> <b>A) in Northern Ireland?</b> <b>B) or elsewhere? (Please state location)</b>	A) In Northern Ireland Lightsource has recently gained planning permission for Solar Farms and grid offers. We are working towards developing our first Solar Farm in Northern Ireland in 2014/2015. B) Lightsource have developed Solar Farms in England, Wales, and Scotland.	y
Q6	What type of connections are you interested in?	We are interested in connects at Distribution level and Transmission level.	y
Q7	<b>Should contestability be applied to:</b> <b>A) Transmission and distribution connections?</b> <b>B) Onshore and offshore connections?</b>	A) Yes B) Yes	y

No.	Question	Your response	Consent to Publish Response (Y/N)
Q8	<b>To what extent should different rules apply to Transmission Network Operators and Distribution System Operators?</b>	The same regulatory and commercial rules and principles should be applied to both, however consideration of timelines for varying technologies needs to be applied. Solar Farm connections at distribution are less technically complex than large scale wind and have a project lifecycle of less than a year. Solar Farm construction timelines are between 2-3 months, therefore rules and policies created should be scalable to enable this, similar to existing policies with other DNO's in the UK.	y
Q9	<b>To what extent should different rules apply to offshore connections and onshore connections?</b>	N/A	y
Q10	<b>What industry codes would require updating to facilitate contestable connections?</b>	<p>NIE and SONI Statement of Charges would need to include indicative costs and timelines to enable developers to plan projects and make investment decisions. This is already in place in ROI through the CER approved paper "<a href="http://www.esb.ie/esbnetworks/en/commercial-downloads/Contestability-on-the-Distribution-System-Key-Principles-and-Processes%20.pdf">http://www.esb.ie/esbnetworks/en/commercial-downloads/Contestability-on-the-Distribution-System-Key-Principles-and-Processes%20.pdf</a> and CER approved Costs: <a href="http://www.cer.ie/docs/000837/Standard%20Transmission%20Charges%202014%20(CER13303).pdf">http://www.cer.ie/docs/000837/Standard%20Transmission%20Charges%202014%20(CER13303).pdf</a></p> <p>Additionally the DNO's in the UK have publications available such as Western Powers Connections Charging Statements: <a href="http://www.westernpower.co.uk/Connections/New-Connections/Connections-Charging-Statements.aspx">http://www.westernpower.co.uk/Connections/New-Connections/Connections-Charging-Statements.aspx</a></p> <p>These codes should include key principles, boundary definitions, interface with Network Operator / Owner , responsibilities of customers and Network Owner / Operator, functional specifications, design reviews, construction commissioning, operation and maintenance and assets transfer.</p> <p>Lightsource would encourage knowledge sharing between NIE and other DNO's so that lessons learnt are incorporated in new policies. Other DNO's have already developed functional specifications for contestable works, therefore NIE may be able to leverage from the great amount of work already undertaken by other DNO's. This would save time in the roll out phase of the new policies and codes.</p>	y
Q11	<b>What works should be deemed as non-contestable?</b>	As with existing contestability policies, there are certain works and assets which would not be suitable due to their proximity to the existing live Transmission and Distribution System.	y
Q12	<b>How should operations and maintenance be managed during the lifetime of a contestable asset?</b>	As already established in the ROI there should be standard and transparent methodologies for for calculating the operations and maintenance charges for the lifetime of the contestable assets.	y
Q13	<b>Should different degrees of contestability be introduced for each connection type?</b>	Contestability of dedicated and shared assets should be available at all voltage levels. In some instances where the connection method is not an integral part of the system the opportunity to remain the asset owner of the connection should be considered.	y

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Q14	<b>What are the barriers to introducing contestable connections?</b>	There are no barriers to introducing contestability, as it has worked well for other Network Owners and Operators. Dedicated resources from NIE will be required to implement it, however given the principles have already been established elsewhere leveraging from this will significantly save on effort required. Once rolled out, NIE will benefit from a reduced workload if customers undertake the grid works contestability.	y
Q15	<b>What is the current impact of not having contestability in the connections market?</b>	The current impact is that connections in Northern Ireland are significantly more expensive and connection timelines are longer. This creates a more challenging environment for developing projects.	y
Q16	<b>What is your view of best practice in regard to contestable connections?</b>	Best practice in delivering contestable connections in GB and ROI has already been established, These should be adopted to avoid " re-inventing the wheel".	y
Q17	<b>What type of arrangements would achieve the right balance between contestable and non-contestable works?</b>	As above, similar to those principles already established.	y
Q18	<b>What problems could arise from the introduction of contestability?</b>	Initially there may be co-ordination and interfacing issues on the design and delivery end of contestable works. However this can be mitigated against by the timely provision of functional specifications, a clear understanding of the requirements for design review and finally the quality assurance standards for assets once they are to be handed back. Additionally, agreed timelines involved will benefit both parties.	y
Q19	<b>How much of a factor is the cost/timing of a new connection in regards to setting up a business/generator?</b>	Critical - Especially since planning permission is required as part of the grid offer. This is not required for Solar Farms with other DNO's within the UK and is currently the biggest barrier to working within NI. As outlined above the timelines for constructing Solar Farms is 2- 3 months, therefore relative to this obtaining grid is the biggest challenge and project risk. Contestability will allow developers to accelerate their connection,significantly reduce the overall project lifecycle and mitigate against project risks.	y

No.	Question	Your response	Consent to Publish Response (Y/N)
I1-1	Describe your issue	Requirement for planning permission at Grid Application	
I1-2	How often does this issue arise?	All projects	
I1-3	Where does the issue arise?	All projects	
I1-4	What more could be done to deal with the issue?	Flexibility or adopting policies similar to other DNO's in the UK	
I1-5	Why can't the issue be dealt with or what are the barriers to implementing change?	Consultation with NIE required	
I1-6	How has delivery of your connection been affected by this issue?	Presents a barrier to entry	

No.	Question	Your response	Consent to Publish Response (Y/N)
I2-1	Describe your issue	No standard Timelines or Indicative costs from NIE	
I2-2	How often does this issue arise?	All projects	
I2-3	Where does the issue arise?	All projects	
I2-4	What more could be done to deal with the issue?	Standardisation as in GB and ROI	
I2-5	Why can't the issue be dealt with or what are the barriers to implementing change?	Consultation with NIE required	
I2-6	How has delivery of your connection been affected by this issue?	Presents uncertainty regarding project costs and timelines, which presents challenges at project financing stages.	

No.	Question	Your response	Consent to Publish Response (Y/N)
I3-1	Describe your issue		
I3-2	How often does this issue arise?		
I3-3	Where does the issue arise?		
I3-4	What more could be done to deal with the issue?		
I3-5	Why can't the issue be dealt with or what are the barriers to implementing change?		
I3-6	How has delivery of your connection been affected by this issue?		