

Respondent Details

Company Name:	Ulster Farmers Union
Respondent Name:	Chris Osborne
Designation:	
Address:	475 Antrim Road Belfast BT15 3DA
Phone Number:	02890 370222
Email Address:	christopher@ufuhq.com

No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	How would you define 'contestability'?	As per the OFGEM definition we would expect "contestability" activities to include the design, procurement and construction of the sole use connection assets. More generally contestable markets occur when there is freedom of entry and exit into the market.	Yes
Q2	What do you see as the main benefits of introducing contestability in new connections: A) To the consumer? B) To your company?	A) Wider choice and the possibility of lower electricity bills. B) By our company I will be speaking on behalf of our members. Contestability will offer a choice when connecting to the grid, with the option of comparing costs for works, however, the UFU are realistic that due to the nature of the NI grid, contestability is unlikely to lead to reduced grid connection quotes nor lead to an improvement in the current difficulties being experienced (at least in the short run).	
Q3	What is the nature of your company's business?	The UFU are the largest representative for the land-based sector in Northern Ireland. The UFU in this instance represent generators and consumers. Generators in the sense that we represent farmers and landowners generating small scale renewable electricity. Consumers in the sense that our members farm businesses rely upon the 11kV lines crossing their land to provide electricity to their rural businesses.	Yes
Q4	What is your role in making new connections to the electricity network... A) At present? B) In the future?	At present our members are connecting their traditional businesses to the grid as well as solar panels, small scale turbines, AD and hydro units. In the future this will continue with many traditional connectors upgrading lines from single to 3 phase as they expand their businesses.	Yes
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)	A - considerable experience providing lobbying support and practical advice to farmers and landowners. B - None	Yes
Q6	What type of connections are you interested in?	11/33kV connections. Connecting small/micro scale renewables. Farm businesses ranging from a couple of acres to enterprises with 700+ dairy cows, grain dryers, poultry houses with tens of thousands of stock requiring 24 hour electricity supplies.	Yes
Q7	Should contestability be applied to: A) Transmission and distribution connections? B) Onshore and offshore connections?	A) Yes, to both. B) Yes, to both	Yes
Q8	To what extent should different rules apply to Transmission Network Operators and Distribution System Operators?	The UFU believes that the same rules should apply to both. It would be different if we were discussing non-contestable matters, but the understanding would be that contestability on the TNOs would have a knock on effect on DNOs and vice versa.	Yes
Q9	To what extent should different rules apply to offshore connections and onshore connections?	The UFU would favour different rules in this case as the onshore market differs to the offshore one as it includes small scale generators and consequently embedded generation. However, the UFU would wish to see different rules for single turbines compared to wind farms. In addition, consideration would need to be given to possible allowances for microgrids.	Yes

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Q10	What industry codes would require updating to facilitate contestable connections?	Transmission licences, the distribution licence, the market operator licence (subsequently Statement of Charges). G59/G83	Yes
Q11	What works should be deemed as non-contestable?	Non-contestable activities would include determining the point of connection to the distribution system, design approval and undertaking upstream reinforcement to the distribution system.	Yes
Q12	How should operations and maintenance be managed during the lifetime of a contestable asset?	This could be done along the basis of the current system namely a Price Control system similar to GB.	
Q13	Should different degrees of contestability be introduced for each connection type?	Yes, lower the scale of generator, the wider the degree of contestability. Multiple single grid connection applications would benefit from a wider choice of potential supplier. Whereas clusters of wind farms would not by their very nature.	Yes
Q14	What are the barriers to introducing contestable connections?	The current state of the NI grid, plus the inoperation of both the North/South interconnector, the Moyle Interconnector and a lack of enthusiasm amongst the industry to consider how microgrids could work within the current system. Possible barriers to entry will have to be overcome including economies of scale in the favour of the incumbent DNO, as well as sunk costs, vertical integration, access to technology and skilled labour.	Yes
Q15	What is the current impact of not having contestability in the connections market?	Poor quality in electricity, a lack of competition in grid connection and high prices (to the consumer and the generator)	Yes
Q16	What is your view of best practice in regard to contestable connections?	Best practice is crucial for the success of contestability in NI grid connections. There could be a role for the Utility Regulator to benchmark the performance of the network operators against a list of pre-set best practice criteria.	
Q17	What type of arrangements would achieve the right balance between contestable and non-contestable works?	It should be down to the DNO to engage with the industry to consider where it is possible to extend contestability further.	

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Q18	What problems could arise from the introduction of contestability?	Requirements such as access and outage arrangements, which are necessary to support full operational contestability, would be unduly complex and could be costly to consumers.	
Q19	How much of a factor is the cost/timing of a new connection in regards to setting up a business/generator?	This is critical. When installing a small scale wind turbine, finance is often on a short time scale, with offers being time limited. Any delays (as seen in NI over the last 5 years) will often wither add cost to a project or deem it unviable. Same applies to cost, there is a noticable gap in grid connection costs between NI and GB and whilst the need for upgarde work on 11kV lines to accomodate small scale renewables, these higher costs casn also be attricuted to the lack of contestibility.	Yes

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I1-1	Describe your issue	Ongoing problems experienced by landowners attempting to connect small scale renewables to the Northern Ireland grid. The grid connection costs are very high and the application period is often lengthy and drawn out. Capacity problems have meant that conditional offers were issued and many applicant have not been able to connect to the grid.	Yes
I1-2	How often does this issue arise?	On a very regular basis	Yes
I1-3	Where does the issue arise?	The issue arises when the grid application is made and carries on until the generators connects.	Yes
I1-4	What more could be done to deal with the issue?	Opening up of contestibility in theory should relieve the problems, however, we are conscious of the fact that the nature of 11/33kV grid plays a role and will not be remedied by contestibility.	Yes
I1-5	Why can't the issue be dealt with or what are the barriers to implementing change?	The obvious barrier is the fact that there is no contestibility in connections, meaning that NIE are the only DNO in the market.	Yes
I1-6	How has delivery of your connection been affected by this issue?	Many landowners have been put off connecting to the grid due to the very high costs. Those who have proceeded have pay substantial sums of money and their break even in their business plan has had to be extended.	Yes

No.	Question	Your response	Consent to Publish Response (Y/N)
I2-1	Describe your issue		
I2-2	How often does this issue arise?		
I2-3	Where does the issue arise?		
I2-4	What more could be done to deal with the issue?		
I2-5	Why can't the issue be dealt with or what are the barriers to implementing change?		
I2-6	How has delivery of your connection been affected by this issue?		

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?		