

No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	How would you define 'contestability'?	Contestability is the right for a developer connecting to the national grid to plan, design and construct all or part of their dedicated and shared connection asset (subject to the network operators technical specifications).	Y
Q2	What do you see as the main benefits of introducing contestability in new connections: A) To the consumer? B) To your company?	A) Introducing contestability will facilitate timely deliver of onshore wind energy projects thereby expediting cost savings to the consumer through a reduction in wholesale market electricity price. B) The ability to deliver generation connection in a more timely and cost effective way.	Y
Q3	What is the nature of your company's business?	ABO Wind NI Ltd is a subsidiary of ABO Wind AG a German headquartered Renewable Energy Development Company operating in ten countries. ABO Wind; plan, finance, construct and operate wind farms.	Y
Q4	What is your role in making new connections to the electricity network... A) At present? B) In the future?	At present, ABO Wind routinely builds connections to the electricity network and shared connection assets across Europe, including ROI where ABO Wind Ireland Ltd led the sub-group which built the first contested 38/110kv sub-station at Cauteen, Co. Tipperary. ABO Wind NI Ltd anticipate the ability to also build similar dedicated and shared connection assets in NI.	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)	ABO Wind awaits its first planning permission in NI and therefore has no experience in making new connections in this jurisdiction. ABO Wind routinely makes new connections to the electricity network in Germany, France and Ireland, where most of its development portfolio is located.	Y
Q6	What type of connections are you interested in?	ABO Wind is interested in large scale onshore wind generation connections	Y
Q7	Should contestability be applied to: A) Transmission and distribution connections? B) Onshore and offshore connections?	Yes, all connections; transmission, distribution, onshore and offshore	Y
Q8	To what extent should different rules apply to Transmission Network Operators and Distribution System Operators?	No discrimination, the same rules should apply	Y
Q9	To what extent should different rules apply to offshore connections and onshore connections?	No discrimination, the same rules should apply	Y

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Q10	What industry codes would require updating to facilitate contestable connections?	A clear procedure needs to be in place which sets out the process for delivering a contestable connection. In ROI the CER approved a paper titled "Contestability on the Distribution System– ESB Networks Key Principles and Processes Paper" which might be a useful basis. ABO Wind have not yet contested grid connection works in the UK so have no experience in this jurisdiction, but understand there are similar documents which can be drawn upon.	Y
Q11	What works should be deemed as non-contestable?	ABO Wind would consider that; work in live substations, metering, system protection and deep reinforcement would remain non-contestable.	Y
Q12	How should operations and maintenance be managed during the lifetime of a contestable asset?	ABO Wind consider that O&M of the contestable asset should be managed through a system of standard transparent maintenance charges paid by generator(s) to the network operator / asset owner, as per current arrangements. Where the ownership of assets are considered for contestability then the O&M should be managed directly by the wind farm owner	Y
Q13	Should different degrees of contestability be introduced for each connection type?	All shallow connection assets (dedicated and shared) should be contestable (excluding those works referred to in Q11). In circumstances where the dedicated works do not form an integral part of the wider system e.g. a dedicated tail feed wind farm connection with no demand customers, then the ownership of the assets should also be contestable.	Y
Q14	What are the barriers to introducing contestable connections?	The only potential barrier we foresee is DSO/TSO resourcing to produce the necessary documentation / functional specifications	Y
Q15	What is the current impact of not having contestability in the connections market?	Contestability brings cost and time savings for connection of large scale renewable generation to the grid network. Not having contestability imposes higher costs and delays and reduces investor confidence.	Y
Q16	What is your view of best practice in regard to contestable connections?	We have experience of the arrangements in ROI. They have been modified through experience and could be adopted for use in NI.	Y
Q17	What type of arrangements would achieve the right balance between contestable and non-contestable works?	All shallow connection assets (dedicated and shared) should be contestable (excluding those works referred to in Q11)	Y
Q18	What problems could arise from the introduction of contestability?	Potential areas where difficulties could arise are; (1) lack of clear and timely available function specifications, and (2) a lack of close co-operation between DSO & TSO in the preparation of functional specifications to prevent problems at interfaces within substations. These potential problems can be readily avoided through early engagement with key stakeholders. In addition a clear design review and quality assurance process for contestable assets being handed back to the SO with defined timelines will be important	Y

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Q19	How much of a factor is the cost/timing of a new connection in regards to setting up a business/generator?	It is the most critical factor along with planning permission	Y