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Date

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Contact

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Dear All,

Consultation on SONI's DRAFT Transmission Development Plan (TDP) for Northern Ireland (NI) 2018-27

ScottishPower Renewables (SPR) is part of Iberdrola, one of the world's largest utilities and leading wind energy producer. ScottishPower Renewables is responsible for progressing the deployment of onshore wind projects in the UK and Ireland, and offshore windfarms throughout the world, managing the development, construction and operation of all projects.

We currently have over 30 operational windfarm sites with over 2GW installed capacity throughout the UK and Ireland, including our share in the 389 MW offshore windfarm West of Duddon Sands. In addition, we have a substantial development portfolio of onshore windfarms in the UK and Ireland and offshore wind projects in the East Anglia Zone, including the 714 MW East Anglia ONE project which is currently under construction.

We therefore welcome the opportunity to respond to the consultation on the SONI's TDP 2018-27.

We believe that investment and investment certainty for developers in transmission system development is paramount to facilitating connection access and removing the very real barriers to entry that exist today. Transparency of information would enable developers to form more realistic business cases. Equally, a defined, time-governed process to allow new connections or extensions to connection agreements for re-powering should be developed to remove the significant amount of uncertainty around applications that exists at present. There are a considerable number of developers considering repowering sites within the plan's scope.

We do not believe that the TDP draft fully recognises the reinforcement investment required for existing connected generation, nor does it adequately provide for the increased levels of renewable generation that will be required to deliver decarbonisation targets.

Dispatch down of wind farms in NI was 9% in 2018, demonstrating that the absence of Associated Transmission Reinforcement (ATR) is already impacting wind farm output. The draft TDP does not make sufficient reference to the impacts of the proposed ATRs on making existing generation firm, and we recommend that the ATRs refer to how much

generation could be relieved of constraints. We are concerned about the delays to required ATRs and also the regular push-back of estimated completion dates.

We recommend additional focus on the coordination between NIE and SONI to deliver the best outcome for the system as a whole. This includes coordinated planning and operational processes, data management, and transparency, to enable efficient system decisions i.e. whether an investment at a transmission or a distribution level is in the best interests of consumers. A Joint Planning Committee with the SO and TO, such as exists in GB, could facilitate this liaison.

We would appreciate if the Plan could include a review of all clusters even if there are no reinforcements planned.

In general, we believe that there is a fundamental need to develop a flexible and principle-based approach to connections and network access. Policy must be future-proofed to provide clear and comprehensive processes that facilitate all types of connections in a transparent and cost effective manner. The existing Electricity Licence and Order are no longer fit for purpose and an urgent review of both is required to enable market requirements such as flexibility and smart systems.

We recognize a lot of good work that is taking place such as the flexible connections working group and the Open Networks milestone considerations with the ENA but urge that in order to bring such concepts into fruition, groups need to be adequately resourced and solutions must be enforceable (take milestone capacity allocation for example.)

The use of new technologies can also bring advantages including enhanced operational performance, improved system reliability, network reinforcement deferral, shortened construction times and reduced impact on the environment. All of these have the potential to reduce system costs. We encourage the development of hybridisation regulation frameworks and rules as part of a post-DS3 programme to enable higher System Non-Synchronous Penetration (SNSP). We also recommend greater emphasis on innovation to enable SONI to continue to deliver world-leading levels of renewable penetration.

We would welcome discussion on any of the above and if you have any questions in relation to this response, please do not hesitate to contact me directly.

Yours sincerely



Ricardo Da Silva
Grid & Regulation Analyst