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Follow Up Flag: Follow up
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To whom it may concern

The Minister's proposal is designed to limit the cost burden on consumers which would arise due to DECC's refusal to consider socialisation of the cost of the NIRO beyond April 2016. The proposal also appears to be designed to protect those developers who have committed expenditure prior to the date of the consultation, where that project is committed both in terms of grid connection and planning.

Therein lays the difficulty. Some developers, like myself, have secured planning permission and paid their grid connection deposit prior to 30 September, but still fall foul of the grace period rules because we have had to re-apply to Planning for an alternative turbine type and are awaiting the outcome of the amendment. This may be due to unavailability of the original turbine proposed, or it may be due to other technical or economic constraints imposed by the grid offer, or for other commercial reasons. In these cases the developer is financially committed, (in my case the NIE deposit paid in August 2014 was in the region of £60,000), I have also incurred further planning and environmental costs, but the terms of the grace period now seem to prevent the project proceeding. This is surely not the intention of the eligibility criteria.

I would suggest that the grace period eligibility criteria should define the 'relevant planning permission' as a Planning approval for a wind turbine dated prior to 30 September 2015, ***or any subsequent change to that approval submitted prior to 30 September 2015 and dated prior to 1 April 2016***. In this way the developer is given the opportunity to construct the turbine which is best suited to the site and grid conditions, as opposed to constructing a sub-optimal turbine which would still be entitled to avail of the grace period. Crucially there are no additional turbines eligible for the grace period beyond the number envisaged by DETI in the proposal dated 30 September.

Yours Sincerely

Neal Doherty
Director

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