Consultation Response

DETI Consultation Paper 'Closure for the Northern Ireland Renewables Obligation to new onshore wind in 2016.'

On behalf of Sorne Wind Energy Ltd

14th October 2015

JUNO | PLANNING & ENVIRONMENTAL LIMITED

Draft: OEK
Review: HEH
Issue: OEK

1.0 Introduction

This document has been prepared with regard to Department of Enterprise Trade and Industry (DETI) consultation paper entitled "Closure of the Renewables Obligation to new onshore wind in 2016" on 30th September 2015. JUNO Planning & Environmental Ltd has prepared a response to the consultation paper on behalf of our client, Sorne Wind Energy Ltd. Our client intends to construct and operate two large scale windfarm developments in Co. Antrim (Planning Reference No.G/2011/0041) and Co. Tyrone (Planning Reference No.M/2007/0700/F) and requires clarification on a number of matters not currently addressed by the DETI consultation paper.

2.0 Comments and Queries on DETI Consultation Paper

Listed in sections 2.1- 2.3 below are our client's comments and queries on the proposed eligibility and evidence criteria for grace periods, as outlined in consultation paper.

2.1 Question 1

Section 2.9 of the Consultation Document states the following:

> *"Projects that satisfy the early closure grace period criteria, and for which they will need to apply to Ofgem, would be able to accredit under the NIRO up to 31 March 2017. If they cannot accredit by that date due to grid or radar delays, they may apply for a further grace period of 12 months up to 31 March 2018. The criteria for the grid and radar delay grace periods for these projects is the same as that for non- wind projects as set out in Annex A."*

Our client queries whether any provision is made for eligible projects benefitting from a further grace period to accredit under the NIRO, (if the same projects have met the radar/ grid delay grace period criteria) if relevant grid works are still not completed by NIE/ SONI before March 31st 2018 (where this is clearly agreed by all parties as the fault of NIE/ SONI)? The requirement for NIE/SONI to install grid connections for 480MW of onshore wind power in just over 2 ½ years is likely to be challenging. This is an issue that should be addressed in the consultation paper.

2.2 Question 2

Annex A of the consultation paper 'Grace Period Criteria for Projects that meet the Eligibility Criteria' details the evidence required for a further grace period of 12 months until 31st March 2018 (owing to grid or radar delays). In addition to the 'evidence' required (as detailed in Annex A) we seek clarification and confirmation on what (if anything) further is required from developers? Furthermore does the developer have to demonstrate that they are ready to connect to the grid by 31st March 2017? Will turbines have to be on-site by April 2017, despite the fact that grid connection may not be provided for a period of up six to nine months? Further clarification is required from DETI on this matter.

2.3 Question 3

Can DETI clarify the minimum requirements to allow a windfarm qualify for ROCs under the proposed policy?

i. Does each of the turbines on the site that wish to qualify for ROCs support need to be energised and exporting power?

ii. Is it sufficient that one of the turbines on the site has been energised and has exported power?

iii. Is there any level or minimum % of turbines that need to be energised and exporting power in order to allow all turbines on the site qualify for ROCs support?

3.0 Conclusion

Our client requires clarification on the questions(1,2 and 3) set out in sections 2.1 to 2.3 above in order to provide surety and confidence in their plans to construct and operate two large scale windfarm developments in Northern Ireland (Co. Antrim and Co. Tyrone).