Renewable Electricity Branch
Department of Enterprise, Trade and Investment
Netherleigh
Massey Avenue
BELFAST
BT4 2JP

Date: 14th October 2015

Subject: Response to NIRO consultation document

Dear Sir/Madam,

EWT would like to respond to the question posed in DETI's recently published consultation paper regarding a revised policy in relation to the closure of the Northern Ireland Renewables Obligation (NIRO) to new onshore wind projects. Since the early closure of the NIRO will have a tremendous impact on the business of our clients and investments in the onshore wind sector as a whole, I would like to urge DETI to consider our views on the criteria and deadline regarding the proposed early closure grace periods for onshore wind projects:

- Until recently, grid applications could only be made once projects received their planning permit, which has to specify not only the turbine dimensions but also the generator size. In recognition of the delays this was causing, the system has been changed in recent weeks to allow grid applications to be submitted before the permit has been granted. However, a formal response to a grid application takes 90 days, which meant that project developers were not given the time before the announcement of the proposed early closure of the NIRO was made and therefore, did not meet the deadline to qualify for the grace period.

- In April 2015, the central planning system was devolved into smaller planning departments, known as super councils. Our clients found this change disruptive and it took over 6 months to become a functioning entity. This lead to huge delays in approving planning applications, which on its turn meant that clients could not apply for a grid connection and therefore, did not meet the deadline to qualify for the grace period.

- It is recognised by the industry that necessary restructuring has been done within NIE and LPA's in order to optimise the approval process. However, it should also be recognised that these changes took place at a (too) late stage for project developers

Emergya Wind Technologies UK Limited

Thistle Court
1-2 Thistle Street
Edinburgh, EH2 1DD
United Kingdom

T +44 (0) 131 247 6720
F +44 (0) 131 247 6710
info@ewtdirectwind.com
www.ewtdirectwind.com

Registered in Scotland No. SC390117
VAT-no GB108775005

that were already within the system and that were awaiting either the planning application to be granted or the grid connection offer to be made. Since these changes have in the view of the project developers added significant time to the normal planning period, a 6 month period should be maintained for those projects in order to secure the planning approval and the grid connection, and to qualify for the grace period.

- **Recommendation 1:** Extend the deadline to qualify for the grace period until 31st March 2016 for projects to receive both the outstanding planning permit and grid offer.

- The limited grace period will create a challenging time window to construct the project. One of the uncertainties is caused by (un)availability or long lead times of particular wind turbines. Unless it would be possible to switch to another wind turbine model with the same or lower capacity during the grace period, such projects might fail due to this time limitation.

  - **Recommendation 2:** Confirm the possibility to amend the planning permit during the grace period while still being eligible for accreditation as long as the installed capacity of the installation doesn´t increase.

I truly hope that you will consider the above recommendations. If you have any questions, please don't hesitate to contact me.

Yours sincerely,

Mark Jones