DW CONSULTANCY LTD

14th October 2015

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

[Sent by email: NIRO2015@detini.gov.uk]

DW Consultancy Ltd Response to the Consultation Paper titled:
'Closure of the Northern Ireland Renewables Obligation to new onshore Wind in 2016'

Dear Minister Bell,

We, DW Consultancy Ltd (DWC), are wind farm project developers operating in both Northern Ireland and the Republic of Ireland. We have been active in the Northern Irish wind industry for over 15 years, and we have developed a large portfolio of operational (20MW), consented (c.100MW+), and proposed (c.100MW) onshore wind farm projects. We welcome the opportunity to respond to DETI's consultation paper titled *'Closure of the Northern Ireland Renewables Obligation to new onshore Wind in 2016'*.

As members of the Northern Ireland Renewables Industry Group (NIRIG), we note their response to this consultation and are in broad agreement with their response.

We also reiterate the concerns raised by NIRIG with regard to the challenging scenario that the Northern Ireland wind industry has recently found itself in. DWC, in addition to many other wind farm developers, have invested significantly in Northern Ireland and the current uncertainty surrounding the closure of the NIRO and the complete absence of any replacement scheme poses a great threat to our existing investments and the potential for any further future investment.

Our key issues with regard to this current consultation are summarised hereunder:

i. This current consultation should be swiftly progressed to a closure, to enable committed projects to progress,
ii. The additional criteria recently announced by DECC should also be afforded to projects qualifying under the NIRO,
iii. A replacement scheme must be detailed as soon as possible in order to retain investment levels in projects which will not be able to accredit under the NIRO, and
iv. Clarity should be provided on what would happen to projects which are fully constructed and commissioned, but due to delays beyond their control (e.g. failure to deliver grid on time), a project cannot connect until just after the 31 March 2018 cut-off date.

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As a working example of item *iv* above, what would happen in the instance of:

- Wind farm X fulfils the criteria to obtain the one year grace period under grid delays,
- Meanwhile in trying to ensure Wind Farm X can accredit by the 31st March 2018 deadline the developer commits finance and constructs the Wind Farm X before 31st March 2018,
- NIE and or SONI then experience unforeseen delays at the eleventh hour which delay energisation of Wind Farm X beyond 31st March 2018, into say April 2018

We trust that the above sets out our concerns clearly, however please do not hesitate to contact us if you wish to discuss any matter further.

Yours sincerely,

Doreen Walker
Director
DW Consultancy Ltd.