

A Review of the Connections Policy Framework in Northern Ireland

Consultation questions have been extracted from the full document, and provisional answer included below. Full Document can be found at the URL below:

[20230707 Connection Call for Evidence Final.pdf \(uregni.gov.uk\)](#)

Fermanagh and Omagh District Council welcome the opportunity to comment on the proposed review.

Q1. What are the risks and opportunities in relation to the development of micro grids and what issues do these raise for the connections framework in NI?

Risks identified include:

- Electricity stability may be an issue within micro grid systems.
- Frequency and voltage regulation is more difficult when not synchronised to mains grid.
- P2P electricity transfer by prosumers can create privacy issues.
- System complexity.
- Regulation- integration with tariffs, particularly given the lack of 2-way communication metering in Northern Ireland.

Opportunities identified include:

- Less grid infrastructure reinforcement required by Distribution Network Operator (DNO)
- Increased grid efficiency (less distribution losses)
- Therefore, reduced Green House Gas emissions
- Energy security- Protection from blackouts if correctly implemented

Q2. Do you agree with our guiding principles? Please expand your answer.

Yes, there is a clear need to remove any obstacles to renewable energy adoption. The need to pay for expensive network upgrades is an inhibitor to adoption of renewable energy generation. However, with the high incidence of fuel poverty in Northern Ireland, the need to minimise the impact on those who are more vulnerable should also be a guiding principle.

Q3. Do you agree with our proposed scope in relation to this connection review, this includes:

- Are there other issues which you consider we should take into account? If so, please explain why.
The scope covered in the review is appropriate.
- Are there any connection areas we should remove from the scope of our review? If so, please explain why. N/A

Q4. Do you consider the current 'partially deep' connection boundary in NI appropriate? Please explain your rationale further and provide evidence.

Fermanagh and Omagh District Council do not believe that the "partially deep" connection boundary in NI is no longer appropriate. The current "partially deep" disincentives renewable energy generation and "green technology" adoption as it adds to the cost and complexity of any potential projects/ improvements:

- The capital requirement for electricity network upgrades can have a significant impact on the adoption of LCT's and renewable energy generation.
- The timeline for a protect can be significantly extended by the need to consult with NIE engineer prior to project design stage.

Q5. Do you consider a shallow connection boundary to be appropriate in the NI context? Please explain your rationale further and provide evidence. If so, which of the following connection types should have a shallow connection boundary;

- Demand only

Adoption of electrified heating and transport (which is a key NI policy measure) will inevitably require greater demand capacity, and will likely not progress as desired, without this type of legislative intervention to ease the upfront significant financial impact. The shallow approach is best suited for demand, as this may be seen as a "compulsory measure" for domestic consumers (given the 2030 ICE ban and ban of fossil fuel central heating connections).

Q6. Do you consider a shallow-ish boundary to be appropriate in the NI context? Please explain your rationale further and provide evidence. If so, which of the following connection types should have a shallow-ish connection boundary;

- Generation only

The shallow-ish approach to generation will incentivise the adoption of renewable generation technologies, from the current partially deep approach by shielding from the additional cost of connections at the same voltage level and thus reducing the capital requirement. However, it should not be eligible for maximum socialisation.

Q7. Do you believe that moving to a more shallow connection boundary in NI will deliver NI renewable targets that otherwise would not be met? Please provide evidence to demonstrate your answer.

- Yes, Adoption of electrified heating and transport (which is a key NI policy measure) will inevitably require greater demand capacity, and will likely not progress as desired, without this type of legislative intervention to ease the financial impact. This will also help mitigate any ambiguity regarding the potential costs.
- Yes, Adoption of decentralised renewable energy generation will inevitably require greater export capacity, and will likely not progress as desired, without this type of legislative intervention to ease the financial impact. This will also help mitigate any ambiguity regarding the potential costs.

Q8. Please provide evidence on the potential impacts on energy affordability in NI if reinforcement costs were socialised further? What would the impact on energy affordability be in NI if household bills were to increase per annum by;

- 1-3%
- 4-7%
- 7-10%

It is clear that any of the increases above will further exacerbate fuel poverty in the short term, and lead to increased fuel poverty. However, the long-term effects are likely to benefit NI, due to lessened vulnerability to global energy costs, through indigenous energy production and electrified heating/ transport/ industrial processes.

Q9. Can NIE Networks differentiate between RP6 allowances, RP7 business plan connection requests and how these differentiate and have been factored into the analysis that has been done on potential reinforcement connection costs analysis NIE Networks have completed.

RP6 could be re-assigned to focus on priority areas, i.e. low-income domestic households, to help mitigate fuel poverty concerns. This will mean these households are less impacted by the increased Distribution Use of System (DUoS) charges stemming from socialised charges.

Q10. Do you think that a developer led or plan led is the best approach for the future development of connections in NI? Please explain your answer.

A plan led approach would likely be a better long-term solution if it could be implemented correctly. It will help remove some of the “grey area” in terms of project development. However, care needs to be taken to ensure that plans are informed by a wide range of stakeholders including energy companies, local authorities, EV charge providers, Department for Agriculture, Environment and Rural Affairs (DAERA), Department for Economy (DfE), and System Operator for NI (SONI).

Developer led plans, will likely lead to the need for expensive infrastructure upgrades as they will primarily be driven by economics of land cost, transport of material etc, ignoring the knock-on effect this will have on energy poverty. Thus, the extra cost will be passed on to the consumers through the proposed socialisation system.

Q11. Do you think the current 3- month timeframe for SONI and NIE Networks to issue a connection offer is appropriate? Please explain your answer.

The 3-month timeframe is another inhibitor of Low Carbon Technologies (LCT) adoption. For example, local authorities have annual budgets which must be used within short time periods. Additional bureaucracy makes this more difficult.

Q12. If our legislation facilitated it, should obtaining planning permission be a pre-requisite in order to receive a grid connection? Please explain your answer.

No. The planning application process is a lengthy and time-consuming process, and would likely hinder LCT or connection applications in general. Perhaps introducing a time-constraint on the validity of the agreement may lessen the “hoarding” of capacity.

Q13. If our legislation facilitated it, do respondents consider any other issues associated with the current queue process? Or that a different approach to managing the connection queue, would result in quicker connections? If so, what would that be? Are there any lessons to be learned from other jurisdictions?

A prioritisation system could be introduced, based on a plan-led area system. For example, prioritisation could be given to certain plan-led areas, either where excess capacity is available (For demand side applications) or where capacity is constrained (for supply side applications). These projects could be “fast-tracked” and would incentivise developers to make behavioural changes, which would benefit the system holistically.

Q14. Do you have any other information relevant to the subject matter of this Call for Evidence that you think we should consider?

The LCC (Least Cost Chargeable) approach used in the Republic of Ireland seems like a sensible balance between consumers and DNO's. The consumers are charged the minimum amount based on the required infrastructure, but the DNO can choose a different connection methodology, but will be responsible for the excess costs incurred as a result.

Q15. Please list any connection issues you have raised in order of priority. Please explain your reasoning behind your priority.

The need for a MERS registered company (ICP) to carry out minor non-specialist civil works on private property.

We required a low-voltage connection at a disused civic amenity site. To have the connection reinstated, we needed to have a 2-metre trench excavated to accept the cable. We were planning to carry out the trench excavation in-house, but we were advised that this was not permissible. Instead, we were advised that NIE could do this (at a higher cost than expected) or an “MERS” registered company could carry out the works. After consulting with several companies, the civil works were deemed to be too small to make it worth their while and they refused to provide a quotation. In the end, the cost couldn't be justified and so the job was cancelled. If we were allowed to proceed with the minor works ourselves, we would likely have proceeded with the project.

Cost and Uncertainty

The Council have been exploring options for expanding the provision of EV chargers in the district. One of the major obstacles in this process was the connection charges associated with the charging infrastructure.

- There was uncertainty over the need for, and the potential cost to the Council of network reinforcements.
- There were issues over the process of recouping costs from Charge providers.
 - Suggested arrangement involved a sub-metering arrangement, but this would result in increased capacity payments for the Council. There were also issues with Half hourly tariffs and the recouping of costs at different time periods. A separate MPRN (and therefore separate billing) would have circumvented these issues.