

Question 7.

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:

We are of the view that NI should move away from the current partially-deep connection arrangements, and move to a fully shallow arrangement. Connection costs are inhibiting development and putting infrastructure development in Northern Ireland at a competitive disadvantage especially when compared to equivalent infrastructure development costs in other regions or economies. By reducing upfront development costs, there would be encouragement for increase in demand for connections on both generator and demand side which will enable more effective use of existing and new Clusters.

We note that UR are open to considering whether the cluster methodology can be amended to facilitate future connections and Energy Strategy goals and this may include investment ahead of need (including in additional transformers)²

As an example we note that in relation to Cluster connections, NIE Network's statement of connection charges¹ provides that where there is an application for connection to an existing Cluster above the capacity of the First Transformer which necessitates the installation of a second transformer or subsequent transformer or triggers the need for further transmission reinforcement then that applicant shall be required to pay for the full cost of the second transformer or subsequent transformer or further transmission reinforcement (as the case may be) and associated works notwithstanding that the transformer and / or further reinforcement may subsequently become a shared asset.

With the introduction of shallow connection arrangements, this charging policy would not be required. This would be essential as the necessary delivery of increased generation and electrical connections necessary to meet 2030 target will inevitably exceed the currently available capacity in Clusters rated at 90MW. The financial burden of additional connections would be inequitably shared and would be a significant inhibitor to new investment.

Yours sincerely,
Stephen Cross

1. NIE Network's statement of connection charges February 2022
2. A Review of the Connections Policy Framework in Northern Ireland Call for evidence paragraph 1.33