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11 May 2012

Dear Sirs

### **SONI Generator Connection Process Consultation**

The Utility Regulator (UR) welcomes the initiation of this consultation by SONI and are also happy to contribute to this ongoing process.

UR is in favour of harmonising the connection process across both SEM jurisdictions. After conducting a review of the relevant documentation, including the SEM High Level Design, Trading and Settlement Code and Transmission Interface Agreement (TIA) we would make the following points.

The concept of firm access is primarily a matter for the Connection Agreement. This is consistent with the SEM Trading and Settlement Code along with established market practice and is covered in Condition 23 and 16 respectively of the SONI and NIE Licence. We would expect any reference to firm access within the Transmission Use of System Agreement to be consistent with that offered within the Connection Agreement.

We would also like to reiterate the SEM High Level Design Decision, which states "*Where deep reinforcements are not completed and the generator is permitted to connect and export at the shallow connection date its access shall have an amount of capacity which is deemed physically firm and an amount deemed physically non-firm*". We do not expect either SONI or NIE to make a Connection Offer or enter into a Connection Agreement that is contrary to this high level policy decision.

We would be happy to discuss any of the above points at a time of your convenience.

Yours Sincerely



Tanya Hedley  
Director of Electricity, NIAUR