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31 January 2019

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Dear SONI

Written response by RES to: Consultation on SONI Draft Transmission Development Plan for Northern Ireland

RES is the world's largest independent renewable energy company with a portfolio of over 16 GW and operations across Europe, the Americas and Asia-Pacific. RES has been at the forefront of renewable energy development for 35 years and is active in a range of energy technologies including onshore and offshore wind, solar, energy storage and transmission and distribution.

From our office in Larne Co Antrim, RES has been at the forefront of wind farm development in the Republic of Ireland and Northern Ireland since the early 1990s. RES has a growing portfolio of solar and energy storage projects across Ireland.

RES wants to be a part of Ireland's energy future, ensuring that our projects contribute to decarbonising our electricity system to the least cost to the consumer. We consider ourselves well-placed, therefore, to comment on the important issues addressed in this consultation and are grateful for the opportunity to respond.

We welcome this SONI consultation on the draft Transmission Development Plan (TDPNI 2018-2027) for Grid Development in Northern Ireland between 2018 and 2027. Grid investment is now a critical issue for renewable energy developers seeking to connect generation in Northern Ireland as NIE Networks has started to ration grid capacity by permitting connection offers to be issued only at a few identified cluster substations. This is a clear indication of transmission reinforcement significantly lagging behind the needs of connected parties. As such we welcome the publication of the draft TDPNI 2018-2027, in the hope that it not provides clear information to all stakeholders but also helps support the actual delivery of the transmission network projects.

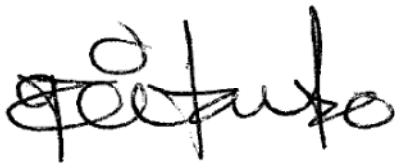
The key point we would like to make is that past and present transmission development projects have been subject to lengthy delays which have left connected renewable generators, which entered into grid connection agreements on a non-firm basis on the understanding that their Associated Transmission Reinforcement (ATRs) would be completed in certain timescales, facing higher uncompensated generation output reductions (grid constraints). As an example, one of the key ATRs, the Omagh South -Turleenan 275kV circuit, had an expected completion date (ECD) of 2020 according to a FAQ letter issued by SONI in relation to one of our projects in 2013. However, the ECD had slipped to 2024 according to a subsequent FAQ letter issued in 2015 in relation to another project. Furthermore, according to a FAQ letter that was issued in 2017, SONI stopped estimating the ECD for this ATR and instead merely listed it as "still in development". The TDPNI would be of a greater value if going forward it helps SONI, NIE Networks and the Utility Regulator to better commit

to the delivery timescales of the project. To this end we have a few suggestions to more clearly communicate the TDPNI to all stake-holders:

- As some projects in the TDPNI are now overdue and we would suggest that such projects be marked as such to help give greater clarity to other stakeholders such as NIE Networks and the Utility Regulator. As projects only proceed with regulatory approval, it would help if it was clearer to the Utility Regulator, which network development projects were now critically delayed.
- Given the delays in some transmission development projects, there is now a high amount of connected and committed generation that is non-firm. We suggest that information regarding non-firm generation be included in the TDPNI, together with the associated transmission reinforcements which would make this generation firm. This would increase focus on the delivery of those projects.
- Projects are reflected in TDPNI with expected completion dates with no clear information of timing of various stages. We suggest that a few more key milestones be added to project timelines (e.g. development completion, planning consent and construction) as this provides a high level programme which if adhered to would help deliver the projects on time.

We hope you find our comments above of interest and we will be more than happy to assist with any further information as required.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Claver Chitambo', with a stylized, cursive script.

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