

NIE NETWORKS RESPONSE TO CONSULTATION ON DRAFT OFFSHORE RENEWABLE ENERGY ACTION PLAN FOR NORTHERN IRELAND

March 2023

NIE Networks Response to OREAP consultation

1: Do you agree with the principles of the Offshore Renewable Energy Action Plan?

Yes

NIE Networks is the owner of the electricity transmission and distribution networks in Northern Ireland and is the electricity distribution network operator, serving over 900,000 customers connected to the network including homes, businesses and farms.

We share responsibilities with SONI in respect of the transmission network. SONI is the System Operator for Northern Ireland and is responsible for the operation and development of the transmission network; NIE Networks retains ownership of the transmission network and is responsible for transmission construction and maintenance.

We agree with the principles of the Offshore Renewable Energy Action Plan to sustainably develop the marine environment, to be adaptive in the approach as new data and insights become available and to work in collaboration and partnership with stakeholders.

NIE Networks have been a participant in both the OREAP Steering Group along with several of the working groups throughout the process so far and will continue to actively feed into all workstreams. We recognise that there are learnings to be taken from GB & RoI in the connection of offshore wind, however it will be important for NI to develop a model which works best for NI and our grid and believe the adaptive approach will underpin the evolution of the right framework, legislation and regulation for NI.

2: Do you agree with the key objectives and actions in relation to Theme 1?

Yes

NIE Networks agrees with the Theme 1 key objectives and support the wider stakeholder engagement throughout the process.

3: Are there any other areas that require further attention?

No

NIE Networks believes the key actions have been covered under this theme and note that the OREAP will be a living document should further actions be identified in due course.

4: Do you agree with the key objectives and actions in relation to Theme 2?

Yes

NIE Networks agrees with the actions and objectives for Theme 2. We work alongside SONI to collectively develop, build and operate the electricity networks in Northern Ireland.

While SONI are responsible for pre-construction work, including consenting, for transmission works, NIE Networks is responsible for construction, and adopt/take over these consents/permissions long term, as well as being responsible for distribution consents for grid infrastructure.

A decommissioning regime along with a leasing round for offshore wind in NI are important milestones that must be delivered swiftly in order to achieve the target of 1GW/80% from 2030.

We welcome the action relating to creating a Memorandum of Understanding (MoU) between DfI/DAERA/DfE to ensure that offshore projects are prioritised. This MoU is important for projects of this nature that are of strategic importance to ensure they are prioritised. We believe that this MoU should consider a framework for identifying 'Strategically Important Projects' for delivery of the NI Energy Strategy for both onshore & offshore. There is significant development still required onshore and any streamlining that can be gained through this MoU

should be equally applied to onshore projects that will have a part to play in delivering 80% including transmission and distribution grid infrastructure and reinforcement projects.

5: Are there any other areas that require further attention?

Yes

As mentioned above, NIE Networks believes that consideration should be given to how this MoU could be expanded either now or in the near future to include onshore renewables along with grid infrastructure and reinforcement to facilitate these connections.

6: Do you agree with the key objectives and actions in relation to Theme 3?

Yes

NIE Networks agrees with the objectives and actions under Theme 3: Electricity Network. We look forward to attending the new working group with DfE, UR and SONI in due course. We are pleased to see the consideration for grid development in the scope of this work as it is important to realise that both the transmission and distribution grids need significant development in order to facilitate new renewable connections; both onshore and offshore.

NIE Networks is working closely with SONI on their work for the next publication of 'Shaping Our electricity Future v1.1' to understand how offshore connections could be facilitated and delivered. We agree with the proposal to use existing processes for connection so far as possible in order to achieve the fastest pathway to connect (removing the need for new processes to be developed, consulted on & licences updated) however we recognise that this may not work post 2030. We believe that the ability for connections processes to also take account of 'Strategically Important Projects' will allow capacity to be allocated efficiently, avoid capacity hoarding and ensure projects that will deliver a benefit in terms of achievement of the 2030 targets should be prioritised.

NIE Networks looks forward to working with SONI, UR and TCE in the work to determine the quantity of offshore capacity to be targeted in the short medium and long term for NI.

7: Are there any other areas that require further attention?

Yes

The planning approval process is a critical path item for both the developer and NIE Networks in any infrastructure project. While the MoU covers the prioritisation of strategic projects, the working group should also consider policy for how strategic planning applications, that help achieve Climate Change Act targets, can be assessed and decided on quicker while still going through due process. This work would cross over from off-shore to any on-shore developments

8: Do you agree with the key objectives and actions in relation to Theme 4?

Yes

We note the cross-over of this objective with Action 12 of the Energy Strategy Action Plan and will be responding to the ongoing consultation.

NIE Networks has developed long-term relationships with colleges and universities to provide routes for a local workforce into the electricity industry. Having benefitted from these relationships, and recognising the opportunity that offshore wind would bring to Northern Ireland, we fully support these actions.

NIE Networks looks forward to working with the various stakeholders to identify policy necessary to maximise potential use of offshore wind with LCTs and believe this scope should also be extended to cover onshore renewables also.

9: Are there any other areas that require further attention?

No

10: Do you agree with the key objectives and actions in relation to Theme 5?

Yes

We believe that legislative and regulatory change is required not just to enable offshore development but to help enable further onshore renewable development that will ultimately help achieve Climate Change Act targets. As such, any review should be holistic in its approach to include both offshore and onshore (albeit a shorter timescale would be required for onshore).

We note the cross-over of this objective with Action 22 of the Energy Strategy Action Plan and will support both workstreams.

While we believe the key actions have been covered in this plan, we are pleased to see that there will be an ongoing review of the legislative and regulatory frameworks to establish any gaps.

11: Are there any other areas that require further attention?

Yes

We note the timescales for actions 20 and 21 are for 2024-25 and believe given recent interest in this area with applications already being received to connect to the grid that this timescale will not provide sufficient guidance in time. We are concerned that NIE Networks and SONI will be expected to work within existing regulatory arrangements and any future changes in 2024-25 could undermine this approach resulting in a lot of re-work and confusion.

To mitigate, we would suggest that an additional action is added where the potential to utilise existing legislative and regulatory framework is considered during 2023, with a commitment by the DfE/UR to summarise both the interim application and long-term development of the legislative framework before the end of 2023. We note the UR has already proposed to carry out a comprehensive connections review in summer 2023 and believe this could be an opportunity to capture any short-term changes needed.

12: Do you have any further comments on the Draft OREAP?

Yes

NIE Networks looks forward to continuing to support DfE in this important area and we recognise the importance of offshore wind development to meet 80% targets. We believe that a lot of the work to streamline processes and implement regulatory and legislative change should also be considered in the context of onshore and a number of the issues which currently surround onshore renewable projects.



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