

**From:** Dafydd I Jones [REDACTED]  
**Sent:** 13 November 2015 11:13  
**To:** North Wales Wind Farm Connection  
**Subject:** 151113 EN020014 Dafydd I Jones Deadline 5 - Comments on post hearing documents

For the attention of Nicholas Coombes

**SP Manweb Document Reference: SPM NWWFC PHSIP1 - Deadline 4 submission**

In response to the above document, I object to the Applicant's misleading interpretation of representation 3(c) of my document of 13<sup>th</sup> October 2015. (Library Ref: Rep 3 – 003)

I set out my representation in full once again:

**3c) Acting in the public interest**

Representation:

The DCO application is founded on the premise that the Applicant, SP Manweb, is acting in the public interest. By connecting the 3 wind-farms (Clocaenog Forest, Brenig and Derwydd Bach – with a combined capacity of 147 Mw), the company claims a public interest defence in furtherance of National Policy Statement – EN 1.

But what certainty is there that 147 Mw of generating capacity will be delivered?

Bearing in mind the original capacity listed in the Strategic Options Report was 170 Mw, and included Vatenfall's Nant Bach windfarm (now withdrawn), at what point, in terms of Mw, does the public benefit argument cease to exist?

In other words, how far does the generating capacity have to fall before the DCO application is no longer in the public interest - when the environmental, socio-economic and cultural/heritage costs associated with a 17 Km Connection Project outweigh the public benefit?

What happens if Derwydd Bach (Capacity 22 Mw) falls by the wayside? Current information supplied by SP Manweb in response to the Examining Authority's questions suggests that this wind-farm remains hugely problematic. It remains without a strike price and with no sign of a further Contract for Difference (CFD) auction taking place soon.

If the DCO is approved on account of the aggregate generating capacity declared by the Applicant in good faith, but ultimately found to be unsound in practice, the Order could well be made on the basis of a misrepresentation.

The Applicant's interpretation of 3(c) is provided below:

*"There is the potential for the amount of electricity generated by the wind farms to decrease such that there would be no supply for the network to distribute."*

In my view, there is no similarity whatsoever between the two. It's also worth noting that my representations 3(a), 3(b) & 3(d) have been reproduced more or less word for word.

The Applicant has failed to grasp the shortcomings of its own cost-benefit analysis, inasmuch as the “public interest” case is not made unless there is absolute certainty regarding delivery of a combined generating capacity of 147Mw.

There is no doubt - the Application is founded on 147 Mw. With every Mw that fails to materialise the “public benefit” decreases, unlike the “public cost” of the proposed connection which remains a constant. If the Examining Authority has concerns over the delivery of any element of the declared generating capacity e.g Derwydd Bach (22Mw), then I believe the DCO application should be refused.

I trust you will bring this representation to the attention of the Examining Team in the usual way.

Yours sincerely,

Dafydd I Jones

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