



Jody O'Boyle  
The Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

1 August 2024

**Re: SONI's Draft Transmission Development Plan for Northern Ireland 2023 – 2032 (TDPNI)**

Dear Jody,

I am writing regarding the consultation on the SONI Transmission Development Plan for Northern Ireland (TDPNI) 2023 - 2032.

**The Consumer Council**

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland (NI).

The Consumer Council has specific statutory duties in relation to energy, postal services, transport, water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

**The role of SONI in delivering for Northern Ireland Consumers**

As TSO for Northern Ireland, SONI plays a pivotal role in the development of the transmission network in Northern Ireland. This network will be critical to the planned transition to a Net Zero electricity industry.

**The TDPNI 2021-2030**

The Consumer Council responded to the Utility Regulator 2020-2029 TDPNI and subsequent Shaping Our Electricity Future consultation. Publication of the Northern Ireland Energy Strategy, the energy crisis, (which was exacerbated by the invasion of Ukraine) have all occurred since these consultations took place. The latter two developments serve as a stark warning that the generation of indigenous energy, as outlined in the Energy Strategy, is an urgent priority for Northern Ireland.

**Accelerating grid delivery**

The draft TDPNI describes 77 different projects, including 36 network development projects. These projects will involve a significant expenditure by SONI and by NIE Networks. Over the 10-year period, SONI's expenditure has been estimated at £61.4m and NIE Networks is projected to spend £571.2m.

Given this scale of this investment, it is critical that the projects deliver the intended outcomes in a timely way, and within budget.

We are pleased to see that SONI has engaged with key stakeholders as it has developed the TDPNI. We continue to believe that such engagement is important to ensure that plans for the transmission network take proper account of local needs.

The feedback from stakeholders reveals common-held concerns. A number of stakeholders have commented that the delivery dates for some historical projects have slipped. Likewise, several stakeholders have highlighted the need for the pace of development to accelerate to achieve the government's legislated 2030 targets.

SONI acknowledges this challenge. In SONI's words, "'business as usual' will not deliver for us". However, it is not clear what concrete actions SONI plans to undertake (and when) to increase confidence in the delivery of the 2030 targets. We note that SONI has been engaging with NIE Networks, DfE and the Utility Regulator (UR) on how current practices might need to change. We welcome this engagement. We would encourage SONI to agree and publish an "action plan" setting out what it plans to do, and when, to accelerate grid delivery. We consider that SONI should publish this action plan by 31 December 2024 at the latest.

#### Supply chain issues

We understand that transmission projects in GB are facing very material supply chain issues. These are arising due to considerable global demands on the manufacturers of transmission equipment.

We note that potential supply chain issues were not discussed at length in the TDPNI. We would encourage SONI to ensure that its plans are robust by identifying specifically how global and local supply chain constraints might impact the delivery and cost of their plans. We would encourage SONI to provide quarterly updates to relevant stakeholders (at a minimum to the UR). This would provide a degree of transparency around identification and management of these critical issues.

#### Project websites

We welcome the fact that SONI is currently auditing its website and project pages, including to ensure that project webpages are updated to provide timely and relevant information. We would encourage SONI to complete this audit and to make appropriate changes to its website and project pages by 31 December 2024.

The Consumer Council would like to reaffirm our commitment to collaboration with SONI and other key stakeholders so that the journey to decarbonisation works in the best interest of Northern Ireland consumers.

Yours sincerely,



**Raymond Gormley**  
**Head of Energy**