

EP UK Investments Response to SONI Transmission Development Plan 2023 – 2032

EP UK Investments (**EPUKI**) welcomes the opportunity to respond to this paper. The development and reinforcement of Northern Ireland's transmission network over the next ten years will be critical to ensuring Security of Supply and achieving the ambitious targets associated with the energy transition.

EPUKI has no material comments on the draft Transmission Development Plan but request further engagement with SONI in the coming years to minimise the impact of planned works on our generation portfolio. Disruption to these units' ability to export to the transmission network would represent a risk to Security of Supply and potential exposure to higher wholesale market prices for consumers. Additionally, SONI has a duty of responsibility to minimise disruption on generation and optimise the planning and delivery of works to minimise potential risks to Security of Supply.

EPUKI recognises that certain projects included on the Transmission Development Plan may necessitate a disruption. For example, the Ballylumford Switchgear Replacement scheduled in 2027 is likely to require outages at B10, BGT1, and BGT2. EPUKI would welcome further engagement closer to this date to ascertain whether it is possible to align these works with the planned outage at B10 in 2028. Aligning these works, if possible, would minimise the impact of generation unavailability on Security of Supply.

Additional works, such as the Kilroot and Ballylumford 275kV CT Replacement and the Moyle Interconnector Capacity Increase may have an impact on the availability of our portfolio. However, EPUKI expects that this impact may be avoided if these works are planned and delivered robustly and with appropriate industry engagement. EPUKI trusts that SONI will deliver these works with minimal interruption to the network.

Finally, it is expected that the delivery of the second North-South Interconnector in 2027 will have a significant impact on network constraints in Northern Ireland. EPUKI would welcome transparency on the evolution of these constraints in the coming years, as well as information on how constraints have been derived and evolved as a result of infrastructure delivery.