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ESB GT response to UR consultation on SONI's Transmission Development Plan for Northern Ireland 2023-2032

Dear Jody,

ESB Generation and Trading (ESB GT) welcomes the opportunity to respond to the Utility Regulator (UR) consultation on SONI's Draft Transmission Development Plan (TDP) for Northern Ireland, 2023-2032. Northern Ireland (NI) has a range of ambitious climate targets, including 80% of electricity being generated by renewable sources by 2030, 1GW of offshore generation from 2030 and Net Zero carbon emissions by 2050. Efficient and timely investment in the transmission system will be critical in achieving these ambitions. Considering this, there is a need to ensure that any long-term plan provides the investor the certainty required for the large-scale construction of new low carbon renewable energy in order to ensure the most cost effective transition to Net Zero for Northern Irish consumer.

As per ESB GT's response to the SONI consultation on the Draft Transmission Development Plan (TDP) for Northern Ireland (2023-2032), there is a risk that the TDP, in its current form, may create a risk to Northern Ireland in meeting its 2030 and 2050 climate ambitions. The investments that were outlined within the January consultation appear not to have been altered to reflect stakeholder concerns with regards to potential underinvestment in the transmission network. The TDP presents only five new projects and a range of existing projects which have been delayed between 1-6 years. Within this, there doesn't appear to be a clear plan to address all of the constraint issues present within the Northwest of NI. ESB GT believes participants' responses, concerns and proposals made to the SONI consultation need to be addressed in any planned consultation paper that UR needs to proceed with to deliver an effective outcome.

Whilst not part of this consultation paper, ESB GT wants to take the opportunity to raise some concerns/thoughts on the SONI Report TDPNI Consultation Response¹, which UR need to ensure are consulted upon, as all of these proposals will influence the investment signal being sent to the market:

1. SONI highlight that the developer led approach to new generation has resulted in a reactive approach to network development, and by moving towards plan led, an approach of anticipatory investment can be introduced. Whilst ESB GT support anticipatory investment, the approach for introducing a plan led model needs to be consulted upon and clearly identified to market participants.
2. SONI are engaging with NIE Networks, DfE and UR on taking an approach similar to GB on a more co-ordinated, plan led approach to network development with the potential to replicate GB's Strategic Spatial Energy Plan (SSEP) model, and not the Centralised Strategic Network Plan (CSNP) which relates to network investment/planning. SSEP is still being designed and

¹ [Report-on-Draft-TDPNI-2023-2032-SONI-Consultation.pdf](#)



SONI will need to engage and consult with industry as to how they want to implement such an approach.

3. SONI are developing an equivalent transmission cluster policy to the distribution policy. It is important that an approach of anticipatory investment takes place at both 110kV and 275kV levels within Northern Ireland. Therefore, ESB GT supports the development of this policy and look forward to participating in the proposed consultation in 2024.
4. SONI are undertaking internal engagement, learning from GB, on an "Acceleration Programme" for grid development (which may relate to the Electricity Networks Commissioners recommendations for accelerating electricity transmission network deployment). The recommendations have a number of actions within it. From the SONI proposal isn't clear what parts of the accelerating electricity transmission recommendations they are seeking to introduce and ESB GT believes greater industry engagement is needed.
5. ESB GT welcomes SONI's proposal to perform a consultation on Reviewing Firm Access Quantity process in 2024. This consultation should ensure it is technology neutral, future proofed and limits distortions between NI and Ireland.

ESB GT welcomes SONI's ambition and its pragmatic approach of adopting strategies that have been proposed elsewhere, however as always, detailed consultation and stakeholder engagement is required. As such we need SONI to also be able to adapt and where there is a significant impact on the investors in a market, consult on those policies and do so in a manner that the experience of investors can be used effectively to drive rapid but certain change. This engaged approach, will hopefully drive the program forward, reduce risks and make for a more competitive environment to secure the right outcome for the consumer.