

# SONI's Transmission Development Plan for Northern Ireland 2023-32

Decision Paper – 22<sup>nd</sup> January 2025



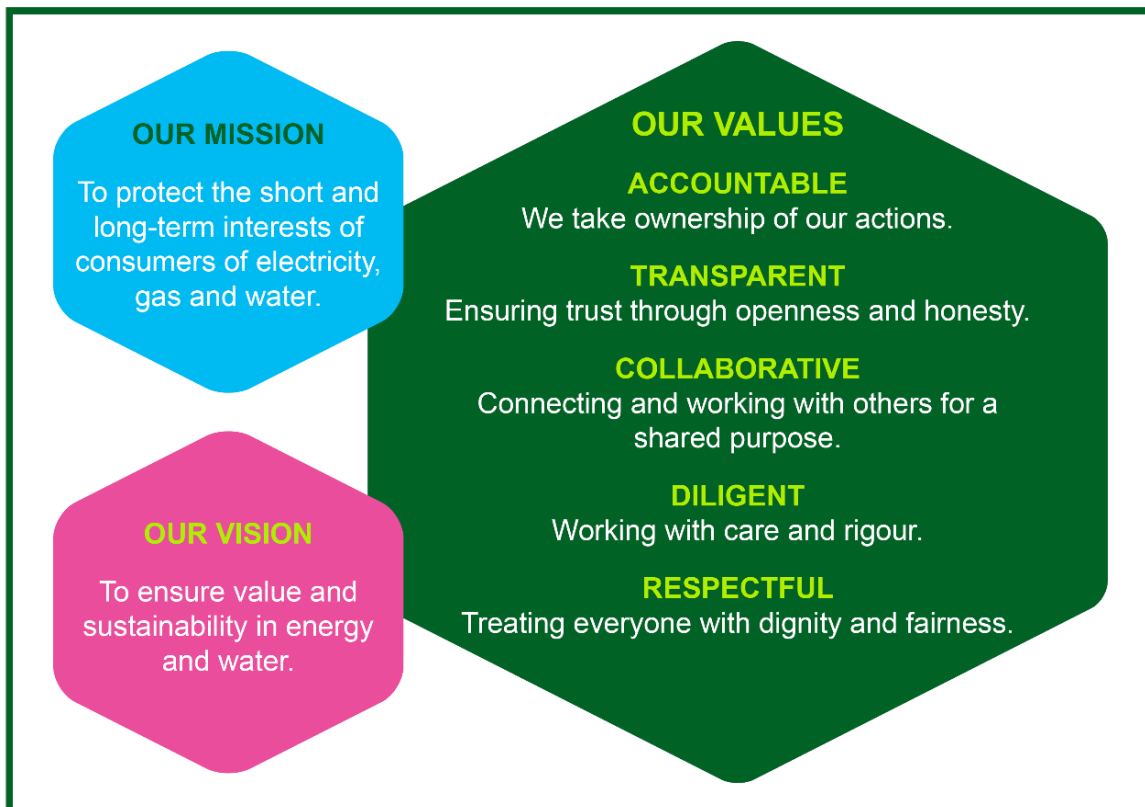
## About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls; Networks and Energy Futures; Markets; Consumer Protection and Enforcement. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.



## Abstract

SONI is the Transmission System Operator (TSO) for Northern Ireland and is responsible for ensuring continuity of electricity supply for homes and businesses across Northern Ireland. In order to do so, SONI must plan investment in the transmission network.

The Transmission Development Plan for Northern Ireland (TDPNI) is the proposal for the development of the NI transmission network and interconnection over the ten years from 2023. This plan presents projects that are expected to be needed for the operation of the transmission network in the short and medium-term.

## Audience

This document is likely to be of interest to regulated companies in the energy industry, government, industry groups, consumer bodies, environmental groups and those with an interest in the energy industry and network planning.

## Consumer impact

The TDPNI provides clarity to consumers on:

- 1) The drivers of electricity transmission investment;
- 2) The need for action in delivery of key infrastructure projects;
- 3) The location and activity of network investment; and
- 4) The estimated cost and timing of project completion.

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## Executive Summary

The Transmission Development Plan for Northern Ireland (TDPNI) 2023-2032 covers the proposals for the development of the NI transmission network and interconnection over the ten years from 2023. This plan presents projects that are expected to be needed for the operation of the transmission network in the short and medium-term.

The TDPNI will help to achieve the strategic objectives as laid out by national and EU policies<sup>1</sup>. The strategic objectives include:

- a) Ensuring the security of electricity supply;
- b) Ensuring the competitiveness of the national economy;
- c) Ensuring the long-term sustainability of electricity supply.<sup>2</sup>

In accordance with its licence (Condition 40), SONI must prepare a TDPNI every year. Under Article 22(4) of Directive [2019/944/EC](#), Utility Regulator (UR) must then consult on the draft TDPNI prepared by SONI.

As part of this process, SONI has consulted upon a plan and submitted a draft TDPNI to UR for consideration. UR has consulted on the draft plan, sharing stakeholder views with SONI.

Both UR and SONI have considered the responses. This paper sets out the findings of the consultation and final decision of UR regarding approval of the 2023-2032 TDPNI.

We are engaging with SONI in regard to the next iteration of the TDPNI.

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<sup>1</sup> Including the [Energy Strategy for Northern Ireland](#), the [Climate Change Act \(Northern Ireland\) 2022](#), the [UK Climate Change Strategy 2021-2024](#), and the [EU's 2030 Climate and Energy Framework](#).

<sup>2</sup> Summarised in [Article 12 of The Electricity \(Northern Ireland\) Order 1992](#).

# 1. Introduction

## Background

- 1.2 SONI is the independent electricity Transmission System Operator (TSO) for Northern Ireland. As part of its function as TSO, SONI has a licence obligation under Condition 40 to produce a Transmission Development Plan for Northern Ireland (TDPNI).
- 1.3 SONI has consulted upon a draft TDPNI for 2023-32. Results have been considered and an updated plan has been submitted to UR.
- 1.4 Under Article 22(4) of Directive [2009/72/EC](#), UR must then consult on the draft TDPNI prepared by SONI. UR's consultation closed for comments on 2 August 2024.
- 1.5 This paper details the findings of the consultation and the subsequent decisions by UR.

## Related Documents

- 1.6 UR consulted on the [SONI Draft TDPNI 2023-2032](#). This was accompanied by:
  - a) SONI Report - [TDPNI Consultation Responses](#);
  - b) SONI Report – [Report on Public Consultation](#);
  - c) Strategic Environmental Assessment (SEA) – [Environmental Report](#);
  - d) Habitats Regulation Assessment (HRA) – [Report](#).
- 1.7 This paper should be read in conjunction with:
  - a) SONI Final TDPNI 2023-32 – [Final TDPNI Document](#).
  - b) UR Consultation – Stakeholder Responses.

## 2 Overview

### TDPNI

2.1 SONI's TDPNI 2023-2032 is the fifth such plan that it has had to complete. This ten year plan undertakes a variety of functions including:

- a) An Approach & Strategy for developing the Northern Ireland Electricity Grid;
- b) Detailing Network Investment needs;
- c) Detailing planned Network Developments
- d) Describing the TSO's planning process;
- e) Detailing project information i.e. category, planning area, location, activity, estimated cost and completion date.
- f) Integrating SONI's Tomorrows Energy Scenarios
- g) Integrating projects identified within SONI's Shaping Our Electricity Future.

2.2 SONI comments in the TDPNI that it has provided analysis and data to the Department of the Economy (DfE) to support the development of the Northern Ireland Energy Strategy, SONI says that the Energy Strategy will *"inform future renewable targets, and the approach to facilitating growth in renewable electricity generation."*

2.3 The UR, in our Corporate Strategy, has committed to ensuring that our regulation supports the achievement of net zero targets, while keeping downward pressure on energy costs.

2.4 The TDPNI describes 77 different projects under this plan. Of this, 41 are NIE Networks' asset replacement projects and 36 are network development projects. On a region and project category basis, they are captured as follows:

**Table 1: Projects by Planning Area and Category**

Projects by Planning Area and Category				
Project Category	North-West	South-East	Both Areas	TOTAL
New Build	7	7	0	14

<b>Uprate / Modify</b>	9	9	2	<b>20</b>
<b>Refurbish / Replace</b>	0	2	0	<b>2</b>
<b>Combination/ Other</b>	0	0	0	<b>0</b>
<b>TOTAL</b>	<b>16</b>	<b>18</b>	<b>2</b>	<b>36</b>

- 2.5 SONI's expenditure on transmission development projects due for completion over the period 2023 - 2032 is estimated at £61.4 million<sup>3</sup>. Estimated Transmission Owner (TO) costs associated with these projects is estimated at £571.2 million.
- 2.6 Estimated TO costs associated with the Asset Replacement plan is £177.5 million.
- 2.7 Total estimated costs of all projects detailed within SONI's 2023-2032 TDPNI is £810.1 million.
- 2.8 UR will determine the amount that can eventually be recovered from customer and generator tariffs for these projects. Some of these projects will be part of the RP6 extension year and the upcoming RP7 period. A link to the RP7 determination can be found at - [RP7 Price Control Final Determination published | Utility Regulator](#). Costs related to projects post RP6 will also be subject to regulatory approval at NIE Networks' RP7 price control.
- 2.9 To allow for comparison of transmission development projects on a year-on-year basis, data is represented at a fixed point in time, referred to as the 'data freeze date'. The data freeze date of TDPNI 2023-2032 was 1 May 2023.
- 2.10 In regards to the Strategic Environmental Assessment (SEA), it should be noted that the SEA has a five year lifespan and SONI is also consulting on the associated Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The environmental report and shadow Habitats Regulations report are available on SONI's Website.<sup>4</sup> The main findings of these assessments have influenced, and are incorporated into, the plan and future plans.
- 2.11 SONI has also produced a report summarising the feedback received from its own consultation. It details the TSO responses to issues raised and

<sup>3</sup> This figure is the amount required to bring projects to the point of handover to NIE Networks and to support NIE Networks during the construction and commissioning phase.

<sup>4</sup> <http://www.soni.ltd.uk/the-grid/projects/tdpni/related-documents/>



determines if subsequent changes are required to the initial version of the TDPNI consulted upon by UR. This report is available on SONI's website [here](#).

## 3 Findings

### Consultation Responses

- 3.1 Ten responses to UR consultation were received. The submissions were provided by:
- Consumer Council for NI (CCNI)
  - Energia
  - Mutual Energy
  - LirIC
  - UFU
  - Renewable NI
  - EP UK
  - ESB GT
  - Source Galileo
  - SEAT
- 3.2 The responses focused particularly on the integration of increased renewables onto the NI system, grid development and its associated processes. Responses also referenced the transition towards net zero targets including the targets set with the introduction of the Climate Change Act and the actions set out within the Department's Energy Strategy. In addition, some responses emphasised the importance of co-ordinating with the Gas Industry to develop a whole system approach and some referenced the importance of the development of the North South Interconnector, regarding Security of Supply.
- 3.3 The annex at the end of this report summarises the stakeholder views and provides UR thoughts. SONI has also provided comment.
- 3.4 UR has engaged with SONI regarding the responses received to our consultation. In our engagement, SONI has provided its response in relation to responses received from UR consultation on the SONI TDPNI 2023-2032. These are published within the table in the annex at the end of this document.

## 4 Conclusions

### Decision

- 4.1 UR welcomes the responses and engagement from stakeholders on SONI's draft TDPNI. We acknowledge from the responses provided within SONI's consultation and UR's consultation, that the focus on increasing renewables on the system along with the importance of grid development projects and the North / South Interconnector remain key to delivering on net zero targets and Northern Ireland's 80% RES targets.
- 4.2 Whilst UR acknowledges that the levels of overall curtailment and constraints remain high and are increasing, the planned network developments and the capacity this offers over the time period of this and future TDPNIs are critical to an electricity system that must evolve to accommodate new technologies to lower min gen levels and reduce Northern Ireland's reliance on thermal generation.
- 4.3 UR recognises that with the delivery of the Department for the Economy's (DfE) Energy Strategy, and the target in the Climate Change Act (Northern Ireland) 2022<sup>5</sup>, for 80% of electricity consumption from renewable sources by 2030, there are important action plans and legislative reforms, to be delivered and implemented in our journey toward 2030. UR is committed to working with all corners of the energy sector to enable and collaborate on the delivery and implementation of the Energy Strategy.
- 4.4 SONI, in consultation with the Republic of Ireland's System Operator and Northern Ireland's Distribution Operator and Transmission Asset Operator, has set out the TDPNI and the required network investment and related TO asset replacement requirements, for the period 2023-2032. It is critical that both SONI and NIE Networks engage and work collaboratively under the framework of the Transmission Interface Arrangement, to deliver these projects and the connections associated with them.
- 4.5 UR welcomes the community engagement that both SONI and NIE Networks have had to date in regards to projects set out within the TDPNI. We encourage SONI and NIE Networks to continually place community engagement at the forefront of Northern Ireland's network infrastructure development.
- 4.6 It is the decision of UR that the 2023-2032 TDPNI provided by SONI in accordance with Condition 40 of SONI's TSO licence, is approved and published accordingly.

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<sup>5</sup> [Climate Change Act \(Northern Ireland\) 2022](#).

- 4.7 We will also shortly be issuing a decision in regards to the modification of Condition 40 of SONI's licence, which will amend SONI's obligation to produce a TDPNI every year, to instead produce one at least every two years, with an annual "revision" obligation for projects that have materially changed. We would expect SONI to continually to consider iterations of, and updates to, the TDPNI to ensure stakeholders have the most up to date information.

## **Annex 1 - Summary of responses to UR's consultation on SONI's draft Transmission Development Plan 2023-2032.**

### **1. The TDPNI should meet the following standards<sup>6</sup>:**

- a) indicate to market participants the main transmission infrastructure that needs to be built or upgraded over the next ten years;
- b) contain all the investments already approved by the Authority and identify new investments which have to be executed in the next three years;
- c) provide for a time frame and estimate of costs (where reasonable) for all investment projects; and
- d) contain such other matters as shall be specified in directions issued by the Authority from time to time for the purposes of the Condition.
- e) contain a reasonable number of future scenarios, which reflect uncertainties and shall, as far as practicable, be consistent with scenarios that licensee uses in other relevant areas of work.

2. Ten responses to UR's consultation were received.

3. It should be noted that not all the commentary in regard to the consultation was in relation to the specific TDPNI that SONI and the UR consulted upon. Where relevant we have responded in regard to the TDPNI commentary, and we have issued some high-level responses to the other elements, but the bulk of UR's commentary is with respect to the TDPNI consultation.

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<sup>6</sup> Condition 40 of [SONI's Transmission Licence](#).

Issue	Consultation Response	UR Response	SONI's Response
<p><b><u>Interconnection</u></b></p>	<p><i>[Mutual Energy]</i></p> <p>MEL highlights the later completion date of 2028 for the Moyle capacity increase outlined in this TDPNI compared to the 2024 completion date outlined in the 2021-30 TDPNI iteration. They also comment on the contingency risk to NI consumers from this delay.</p> <p><i>“Moyle is capable of moving 500MW of electricity in either direction, however it is currently limited by onshore transmission constraints in Northern Ireland to a maximum of 450MW from Scotland to NI, and 400MW from NI to Scotland. Previously Moyle was also limited by transmission constraints in Scotland, but these have been lifted in recent years. The onshore constraints in NI therefore mean that the full benefit of the interconnector to consumers is not being delivered.”</i></p> <p><i>“Our own modelling suggests that a two-year delay to the project (and the associated increase to Moyle’s export capability) would result in the loss of the equivalent of over £10m worth of socio-economic welfare benefits to</i></p>	<p>We note the MEL concern over the completion date for the Moyle capacity increase. SONI has recently consulted on proposing upgrades to the NI circuit to allow the interconnector to operate to its available capacity (500 MW). (<a href="https://consult.soni.ltd.uk/consultation/moyle-interconnector-capacity-increase-project/chapter/about-moyle-interconnector-capacity-increase-project">https://consult.soni.ltd.uk/consultation/moyle-interconnector-capacity-increase-project/chapter/about-moyle-interconnector-capacity-increase-project</a>)</p> <p>UR acknowledges MEL’s response and the discussion of socio-economic costs to NI consumers of the project delay. UR views it as beneficial to see the capacity constraints on the NI side reduced so the interconnector can be used to its full capacity.</p> <p>The Moyle interconnector’s export (NI-GB) capacity is currently restrained to prevent an overload on other circuits. Network upgrades are being proposed so that these potential overloads can also be addressed. We acknowledge that this takes time to process and due process must be followed, we encourage SONI to continue to address the future needs on the network and ensure that the</p>	<p>Please refer to page 11 of the Report on Public Consultation TDPNI 2023-32 where SONI addresses this query (<a href="#">link</a>).</p>

	<p><i>Northern Ireland consumers. As we understand it, this project addresses a contingency risk that is of very low probability.”</i></p>	<p>configuration of the network ensures the maximum available capacity of the NI assets.</p>	
	<p>[LirIC]</p> <p>LirIC expresses disappointment that their project is not included in this TDPNI.</p> <p><i>“Whilst we welcome the recognition in TDPNI 2023-32 of the benefits further interconnection can bring, we are very disappointed that the LirIC project “is not included within any studies or tables in this report.” The lack of inclusion of LirIC, even as a modelled sensitivity, means that if the LirIC project continues to progress the TDPNI 2023-32 becomes in effect redundant, as it does not appropriately consider the implications of a large transmission project on the system of Northern Ireland.”</i></p>	<p>UR acknowledges the concern from LirIC whilst drawing attention to the timing issues around inclusion of this project in the 2023-2032 TDPNI.</p> <p>We would expect the LirIC project to be included in future iterations of the TDPNI.</p> <p>As projects apply for connection offers and accept their offers, we would expect these to be included in any future TDPNI plans.</p>	<p>The connection offer for LirIC had neither been issued nor accepted at the data freeze for this edition of the TDPNI and therefore did not reach the criteria for inclusion in this edition.</p> <p>LirIC will be assessed against the same criteria as other projects at the next data freeze and will be included if it reaches the threshold.</p>
	<p>[Renewable NI]</p> <p>Renewable NI reiterates the importance of NI avoiding a scenario where interconnection replaces its own renewable energy solutions. They say this is avoided through rigorous cost benefit analysis.</p> <p><i>“RNI fully supports the development of the second North-</i></p>	<p>UR welcomes Renewable NI’s support for the North-South interconnector project, collaboration across industry is vital to achieve the 80x30 renewable targets and we note the Renewable NI commentary on the scenario where interconnection replaces the renewable energy solutions.</p> <p>Interconnection is an important element in the future of the NI system. The Energy Strategy</p>	<p>Please refer to page 11 of the Report on Public Consultation TDPNI 2023-32 where SONI address this query (<a href="#">link</a>).</p>

	<p><i>South interconnector.”</i></p> <p><i>“Since the TDPNI 2021-2030, we are disappointed to note that this has been delayed by 4 years, and is now expected to be completed in 2028”</i></p> <p><i>“We must avoid a future scenario in which interconnection would replace or displace NI’s own renewable energy solutions. Therefore, proposals for new interconnectors, including the planned LirlC Interconnector, must be subject to rigorous cost benefit analysis in accordance with a comprehensive DfE interconnection policy that is clear that new interconnectors must provide overall net-benefits to NI consumers and take into account the full cost of Dispatch Down (i.e., the compensation which will ultimately fall payable when Article 13(7) of the Clean Energy Package is implemented).”</i></p>	<p>Action Plan for 2024 stated that DfE will commission research into the costs and benefits to the NI Consumer for different Interconnection scenarios, multiple energy storage options and the 80% Renewable Electricity target up to 2030 and beyond. We will work with the Department to analyse research to consider the implications and impact of interconnection with other jurisdictions, local energy storage, flexibility services and how they impact on the planned increase in renewable electricity generation and within the SEM.</p>	
	<p>[SEAT]</p> <p>SEAT suggests the plan should consider appraisal of multipurpose offshore interconnectors. They suggest that these interconnectors would deliver a better cost benefit solution to meet North/South Interconnector (NSI) objectives, than the NSI.</p>	<p>The UR acknowledges SEAT’s suggestions regarding multipurpose offshore interconnectors and we remain open to considering all options.</p> <p>As stated above, we will continue to work with the Department to analyse research to consider the implications and impact of interconnection with other jurisdictions, this includes multipurpose offshore interconnectors. This will cross over different workstreams, e.g. interconnection,</p>	<p>When developing any infrastructure project, SONI considers a wide range of technology options, and these options are increasing with technological advancements, and assess the best option as assessed against a range</p>



<p><i>“The document in its introductory section describes some of the strategic and regulatory drivers to which it is responding. It however fails to consider the rapidly growing plans in the UK, Ireland and Europe to invest in and develop Multipurpose hybrid offshore interconnectors particularly to meet the demands of renewable energy which will mature during the lifetime of this plan. Given the current projected costs of the NSI it would be rational to appraise whether multipurpose offshore interconnector would deliver a better cost benefit solution to meet the objectives for the NSI as set out in Para 7.4.6.”</i></p>	<p>offshore, legislation etc.</p> <p>Lessons learnt will be taken from GB and other sectors, on the use and interactions of multipurpose offshore interconnectors.</p>	<p>of criteria, including technical feasibility, environmental impact and cost to the consumer.</p> <p>The North South Interconnector received planning consent in 2020. It is a critical project for meeting Northern Ireland’s near and long-term renewable energy ambitions and seeks to resolve the single biggest renewables integration constraint on the Northern Ireland Transmission System. It has undergone continued and rigorous cost-benefit analysis.</p> <p>The project has also undergone numerous independent reviews which endorse the System Operator’s preferred option.</p> <p>SONI has been working closely with NIE Networks to hand the project over so construction can</p>
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			<p>commence late 2024/early 2025.</p> <p>SONI remains open to the use of any new technologies if the need is robust and such technology is identified as the right solution based on multi-criteria analysis.</p>
<b>Project Delivery</b>	<p><i>[Mutual Energy]</i></p> <p>MEL suggests Moyle should carry out the Moyle capacity increase project themselves.</p> <p><i>“Given Moyle’s existing relationships and potential access to resources and the infrequency with which NIE will have undertaken this sort of new 275 kV cable project, we suggest it may be worth considering whether it could be optimal for Moyle to actually deliver this project itself. Whilst we recognise that such a non-standard approach may present its own regulatory and commercial challenges, innovative and collaborative approaches to delivery are likely to be of great benefit and necessary in meeting 2030 targets.”</i></p>	<p>SONI’s role is to plan and develop the NI transmission system and it does this via consultation. Following on from its consultation on the Moyle interconnector capacity increase project, we would expect SONI to progress the upgrades to the NI circuit to allow the interconnector to operate to its available capacity.</p>	<p>Please refer to page 11 of SONI’s Report on Public consultation on TDPNI 2023-2032 Consultation (<a href="#">link</a>).</p> <p>SONI welcome further engagement with MEL in the time ahead.</p>

	<p><i>“MEL would welcome further engagement to consider the potential merits and feasibility of a Moyle-led delivery or indeed other approaches whereby Moyle could support or contribute to the timely delivery of the project.”</i></p>		
<p><b><u>Project Delays</u></b></p>	<p><i>[Mutual Energy]</i></p> <p>Moyle highlights the socio-economic costs of delayed projects.</p> <p><i>“Our own modelling suggests that a two-year delay to the project (and the associated increase to Moyle’s export capability) would result in the loss of the equivalent of over £10m worth of socio-economic welfare benefits to Northern Ireland consumers. As we understand it, this project addresses a contingency risk that is of very low probability.”</i></p>	<p>UR acknowledges the value of this project and hopes to see it progressed as quickly as possible.</p>	<p>Please refer to page 11 of SONI’s Report on Public consultation on TDPNI 2023-2032 Consultation (<a href="#">link</a>).</p>
<p><b><u>Collaborative Approaches</u></b></p>	<p><i>[LirIC]</i></p> <p>LirIC addresses the need for all parties to work proactively together to facilitate timely delivery of infrastructure at an acceptable level of risk.</p>	<p>UR welcomes LirIC’s comments on collaborative approaches and reiterate our encouragement for parties to continually engage to minimise costs to consumers and meet the 80 x 30 legislative targets through necessary network developments.</p>	<p>SONI is currently consulting on its Strategy for 2025-2031. This includes delivery as a strategic ambition. Other detail around this can be</p>

	<p><i>“The continued progression of key project milestones, such as licencing, connection agreements, consenting, land acquisition etc, in a timely manner are crucial to ensure the project is able progress effectively along its critical path and deliver its associated benefits. We would emphasise the need for suitable resourcing and engagement from all key actors in these critical areas to enable delivery at the necessary pace. For example, we would highlight the need for parties such as SONI and UR to provide adequate resource, work proactively together, and with developers such as ourselves, and their counterparts in GB as appropriate, to facilitate and support the timely delivery of infrastructure at an acceptable level of risk.”</i></p>		<p>found on pages 17 and 18 of our draft strategy<sup>7</sup>.</p>
	<p>[EPUKI]</p> <p>EPUKI makes no material comments on the draft TDPNI but requests further engagement with SONI over the coming years <i>“to minimize the impact of planned works on our generation portfolio”</i>.</p> <p><i>“EPUKI recognises that certain projects included on the Transmission Development Plan may necessitate a</i></p>	<p>UR welcomes EPUKI’s comments and expect ongoing constructive engagement between SONI and relevant stakeholders to ensure network infrastructure projects are efficiently completed and levels of transparency are maintained.</p>	<p>This is the normal process for planning between the Generator Outage Planning team and the Transmission Outage Planning team. We will always try to ensure that transmission works align with planned generator outages, to minimise system impact, consumer</p>

<sup>7</sup> [https://www.soni.ltd.uk/newsroom/press-releases/soni-seeks-views-on-draft/SONI-DRAFT-Strategy-2025-2031-Consultation-Paper\\_Clean.pdf](https://www.soni.ltd.uk/newsroom/press-releases/soni-seeks-views-on-draft/SONI-DRAFT-Strategy-2025-2031-Consultation-Paper_Clean.pdf)

	<p><i>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.”</i></p> <p>Other projects mentioned with hopes for transparency and alignment: Kilroot and Ballylumford CT replacement, Moyle Interconnector capacity increase and North-South Interconnector.</p>		<p>impact and participant impact. The work detailed below will certainly form part of our alignment process. SONI would welcome engagement closer to the time.</p>
	<p><i>[Source Galileo]</i></p> <p>Source Galileo emphasizes the importance of collaboration.</p> <p><i>“In light of the foregoing policy objectives, it is imperative that transmission planning is carried out on a coordinated all-island basis and to ensure as far as practicable that projects to be developed will benefit the entire island.”</i></p>	<p>The UR welcomes Source Galileo’s response. UR would encourage all parties across both regions to engage and work collaboratively on the development of a whole system approach, combining all technologies and initiatives for the development and transition to net zero, ultimately for the benefit of NI and ROI consumers at the lowest cost possible.</p> <p>This collaboration needs to respect existing frameworks for all Ireland collaboration.</p>	<p>Under licence, SONI is obliged to plan and operate the transmission system with the Republic of Ireland Transmission System Operator, EirGrid. Following the construction of the North South Interconnector, the transmission system on the island will be significantly more</p>

			integrated and this opens up opportunities to explore further cross-border connections to improve the all-island network. By way of example, SONI and EirGrid are in the process of establishing studies looking at the North-West area and how potential cross-border solutions can address issues on both sides of the border.
<b><u>Regulatory and Policy Environment</u></b>	<p>[LirIC]</p> <p>LirIC highlights the importance of transparency of regulatory arrangements to support investor confidence and delivery of this project.</p> <p><i>“Finally, the development of a multi-jurisdictional infrastructure project, such as LirIC, will only progress in the timeliest and most efficient way when there is a clearly defined, stable and harmonised regulatory and policy environment in place at each end, supporting investor confidence. In addition, early indication of any proposed regulatory arrangement to the revenues of the interconnector, such as a Cap and Floor, to support</i></p>	<p>UR’s regulatory framework and DfE’s policy framework are available here:</p> <p><a href="https://www.economy-ni.gov.uk/northern-ireland-energy-strategy-path-to-net-zero-energy">Northern Ireland Energy Strategy ‘Path to Net Zero Energy’   Department for the Economy (economy-ni.gov.uk)</a></p> <p>Our regulatory framework will be evolving in the future. More information can be found here:</p> <p><a href="https://www.economy-ni.gov.uk/utility-regulator-support-for-decarbonisation-preparation-bill">Utility Regulator (Support for Decarbonisation Preparation) Bill   Department for the Economy (economy-ni.gov.uk)</a></p>	<p>SONI has no comment on this.</p>

	<i>interconnector delivery will also support investor confidence, and accelerate the delivery of social economic welfare benefits to Northern Ireland’s consumers.</i>		
<b><u>Renewable targets</u></b>	<p><i>[Energia]</i></p> <p>Energia is concerned that the reinforcements in the Draft TDPNI are not enough to achieve 2030 RE targets. It is also concerned that an Accelerated Model scenario is not feasible with current grid reinforcements. Energia considers a paradigm shift in resourcing and scheduling is required to achieve the targets.</p> <p>Energia is concerned that any future delays to the North South interconnector will jeopardize the 80 x 2030 targets.</p> <p><i>“In that vein NI’s recent track record is cause for concern. Only 70MW of large-scale renewables has been developed in NI in the past four years at a time when at least 400MW per year needs to be delivered each year until 2030, in order to achieve the government’s legislated 2030 targets.</i></p> <p><i>Energia notes that the TES model ‘Accelerated Model’ scenario is being used to inform future needs from a grid development standpoint. Planning the grid based on</i></p>	<p>UR acknowledges Energia’s concerns. SONI has commented that future iterations of the TDPNI will be updated to include projects that meet the requirements of our 80% RES target, along with the review of their Shaping Our Electricity Future publication.</p> <p>UR continues to work collaboratively with players in the development of the North South interconnector to minimise potential delays to its completion date.</p> <p>Actions will be formulated effectively to meet the objectives of the overall policy set out by DfE.</p>	<p>Please refer to page 13 of SONI’s Report on Public consultation on TDPNI 2023-2032 Consultation (<a href="#">link</a>).</p> <p>Please refer to page 16 of SONI’s Report on Public consultation on TDPNI 2023-2032 Consultation (<a href="#">link</a>).</p>

	<p><i>scenarios in TES which are very unlikely to occur, based on the current trajectory, runs the risk of diverting grid resources and schedules from projects which are substantially more feasible in the near-term (solar, onshore etc.) in favour of offshore projects that have a high risk of delay, and in some cases no contracted route to market.</i></p> <p><i>Given the history of delays in the total list of Asset Replacement Projects and Network Development Projects, Energia is concerned that any further delays will jeopardise the 2030 goals and inhibit the level of renewables that can be utilised.”</i></p>		
	<p><i>[ESB GT]</i></p> <p>ESB GT comments on how there doesn't appear to be a clear plan to address constraint issues within the northwest of NI and that the TDPNI must be altered to reflect stakeholder concerns.</p> <p><i>“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,</i></p>	<p>UR expects SONI to continue work with NIE Networks to reduce constraints in the northwest of NI. We are aware that SONI has been working to develop a Dispatch Down Action Plan which it would hope to publish by the end of the year.</p> <p>This TDPNI draft does include multiple reinforcement projects to carry the projected increased amount of renewable generation and to deliver extra capacity. The TDPNI will be published with the protection of NI consumers prioritised and under SONI’s licence criteria.</p>	<p>TPDNI is based on a freeze date 1<sup>st</sup> May 23 – future additions of the plan will be updated in due course as our plans evolve in line with network needs.</p> <p>The need to address constraints in the NW is an important part of our development plans and we will continue to collaborate with stakeholders in this area.</p>



	<p><i>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."</i></p>		
	<p><i>[Renewable NI]</i></p> <p>RNI is concerned that the necessary transmission developments required to meet the obligations of the NI Climate Act, may not be delivered in time due to repeated delays.</p> <p><i>"We recognise that there can be inevitable delays to projects e.g. relating to planning, but we would urge that every effort be made to avoid delays to projects and we would suggest that clear reasons be given to every project</i></p>	<p>RNI has made effective points. We recognise that a substantial amount of grid infrastructure needs to be delivered at pace with regard to the 80x30 targets and the delays to projects can undermine this target.</p> <p>We continue to correspond with SONI as to how these targets can be best met.</p>	<p>SONI is acutely aware of the impact that delays in project delivery could have on meeting climate goals in the timeframe set out in the NI Energy Strategy.</p> <p>The delivery of grid infrastructure is a profoundly complex process with many moving parts and critical interdependencies. Project timescales and overall</p>

<p><i>that is being delayed in future.”</i></p> <p><i>“However, we are not yet persuaded that the necessary grid infrastructure is being delivered at pace and we would need to see a step change in order to meet the 80% target in the required timeframe. SONI must outline what additional measures are being put in place to ensure that the six ‘critical key enablers’ don’t continue to be delayed. We need to reverse delays and accelerate delivery.”</i></p>		<p>deliverability is contingent on a wide range of external factors and the involvement of other stakeholders and partners, including areas such as the planning system and obtaining the required land access consents in a timely fashion. Bottlenecks or delays in any part of the process can have a challenging impact on the overall delivery timescales.</p> <p>That’s why SONI has undertaken an extensive internal change process to develop a tangible body of recommendations to accelerate future transmission network delivery. This included the plan to establish a Joint Programme Management Office (JPMO) with NIE Networks.</p> <p>SONI and NIE Networks are already working</p>
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			<p>together and have established a joint PMO and a shared programme and we have already commenced implementation of a range of other recommendations within our direct control.</p> <p>SONI has also continued to promote a range of options for policy and regulatory change which could have a more transformational impact on delivery timelines including: the move to more of a plan-led approach; an improvement in landowner compensation; the development of a community benefit scheme for networks in Northern Ireland; the development of a Strategic Spatial Energy Plan for Northern Ireland; movement to a risk-based approach to anticipatory investment;</p>
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			<p>meaningful reform of the planning system and a comprehensive, whole system public awareness campaign on the importance of network infrastructure.</p> <p>The ability to deliver these more impactful reforms are beyond our direct control but we are committed to working collaboratively to explore them.</p>
	<p><i>[Source Galileo]</i></p> <p>Source Galileo draws attention to constraints and lagging development in the Northwest Region of NI and NI as a whole. Source Galileo suggest the six new projects are not sufficiently ambitious. They also request more insight into the Cost Benefit Analysis Mechanism of the TES.</p> <p><i>“Of particular concern is the fact that transmission development in Northern Ireland continues to lag significantly behind the build out of renewable generation</i></p>	<p>Work to reduce northwest constraints is ongoing through various upgrades.</p> <p>SONI will be producing Publication of the final (Tomorrow’s Energy Scenarios) TES System Needs Assessment (SNA) Report on the development needs on the system, the development in the Northwest Region of NI and NI as a whole will be considered in any future reports.</p>	<p>TPDNI is based on a freeze date 1<sup>st</sup> May 2023– future editions of the plan will be prepared in due course.</p> <p>The need to address constraints in the NW is an important part of our development plans and we will continue to collaborate with stakeholders in this area.</p>

*and is particularly acute in the Northwest region. Coupled with the fact that the grid is less developed in general terms in this region and is beset by persistent constraints, it is imperative that the grid is developed in a significant manner and upgraded where appropriate to accommodate increasing levels of demand and supply”*

*“More generally, the level of investment planned is not sufficiently ambitious given that only six new projects are provided for, and a number of existing projects have been delayed for a number of years.”*

*“it is not clear that significant transmission developments and the connection of new renewable generation required to give effect Northern Ireland’s binding climate targets are provided for in this iteration.”*

*“In this regard, the demand scenarios provided for in the draft Plan do not appear to be reflective of existing and future demand.”*

*“It would also be helpful to understand what information was utilised to underscore the underlying Cost Benefit Analysis Mechanism.”*

We recognize the need for anticipatory investment and are developing our plans in this regard hence our investigation of transmission clusters. This change will require UR approval of an update to our charging statement, however we note that anticipatory investments are consistent with recent updates to European legislation.

	<p><i>[Consumer Council]</i></p> <p>The Consumer Council provide feedback from their stakeholders: feedback of a need for an accelerated pace of development to meet 80 x 30 targets. They encourage SONI to agree and publish an “action plan” for grid delivery by 31/12/24.</p> <p><i>“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.”</i></p> <p><i>“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.”</i></p>	<p>We are aware that SONI has been working to develop a Dispatch Down Action Plan which it would hope to publish by the end of the year.</p> <p>UR expects SONI to continue work with NIE Networks and stakeholders to reduce constraints in the northwest of NI.</p> <p>The action plan will hopefully identify some short term and long term projects to reduce the constraints on the NI system.</p>	<p>SONI is acutely aware of the impact that delays in project delivery could have on meeting climate goals in the timeframe set out in the NI Energy Strategy.</p> <p>The delivery of grid infrastructure is a profoundly complex process with many moving parts and critical interdependencies. Project timescales and overall deliverability is contingent on a wide range of external factors and the involvement of other stakeholders and partners, including areas such as the planning system and obtaining the required land access consents in a timely fashion. Bottlenecks or delays in any part of the process can have a challenging impact on the overall delivery timescales.</p> <p>That’s why SONI has</p>
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			<p>undertaken an extensive internal change process to develop a tangible body of recommendations to accelerate transmission network delivery. This includes the plan to establish a Joint Programme Management Office (JPMO) with NIE Networks as part of an action plan to accelerate network development. SONI and NIE Networks are already working together and have established a joint PMO and a shared programme.</p>
<p><b><u>Dispatch Down</u></b></p>	<p><i>[Energia]</i></p> <p>Energia view constraint risks (with wind’s dispatch down having increased fivefold from Q4 2022 to 25.6% in Q4 2023) as a significant concern, at least until the North-South interconnector comes on board. They also highlight min-gen requirements as a constraint (a worry until more synchronous condensers come online).</p>	<p>UR support efforts to finalise the North-South interconnector project as quickly as practicable.</p>	<p>Please refer to page 22 &amp; 23 of SONI’s Report on Public consultation on TDPNI 2023-2032 Consultation (<a href="#">link</a>).</p> <p>We recognise the challenge that dispatch down poses to the industry and Northern Ireland’s renewable integration targets, and we have</p>

	<p><i>“The level of dispatch down that onshore wind renewable units are subject to in Northern Ireland, particularly in relation to constraints, is at risk of undermining existing renewable investments and dissuading new ones.”</i></p> <p><i>“Constraint levels are so high across all of Northern Ireland at the moment however that it undermines much of the benefit of developing projects in good locations versus bad locations. It’s imperative therefore that a sizeable uptick in the delivery of grid capacity occurs in the coming years, to not only promote efficient project delivery in the future, but also maximise the output of existing sites (thus reducing the amount of new capacity that customers are required to fund).”</i></p>		<p>convened an internal dispatch down working group to assess what measures we can take in the short, medium and long term to address this issue.</p>
	<p><i>[Renewable NI]</i></p> <p>RNI emphasise the importance of transmission system developments in order to keep pace with generation and avoid dispatch down.</p> <p><i>“It is vital that transmission system developments keep pace with the connection of new renewable generation, and we see a corresponding ramping down of min gen,</i></p>	<p>We welcome RNI’s response and will continue to engage with SONI on the topics of min gen, transmission system developments and dispatch down.</p>	<p>We recognise the challenge that dispatch down poses to the industry and Northern Ireland’s renewable integration targets, and we have convened an internal dispatch down working group to assess what measures we can take in the short, medium and</p>



	<p><i>otherwise total dispatch down levels will make future renewable investments unfinanceable and potential carbon savings will not be realised.”</i></p>		<p>long term to address this issue. We look forward to engaging with RNI and other stakeholders on this over the coming months. Additionally, our Transmission Cluster policy and upcoming FAQ process review will provide clarity on paths to firm access and the JPMO will help to ensure more timely network development in the future to minimise the need for dispatch down.</p>
<p><b><u>Plan led/Developer led approach</u></b></p>	<p><i>[ESB GT]</i></p> <p>ESB GT comment on the need for consultation before a shift in approach.</p> <p><i>“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</i></p>	<p>UR welcomes the comments and agrees that any future change in approach should be consulted upon, future consultations should be available on the UR and DfE’s websites as well as the SONI consultation portal <a href="https://consult.soni.ltd.uk/">https://consult.soni.ltd.uk/</a></p>	<p>SONI are proactively engaging on the Utility Regulator and DfE consultations to help assist with this.</p>

	<p>participants.”</p>		
	<p>[Source Galileo]</p> <p>Source Galileo says an approach of enabling strategic investment ahead of need should be considered in NI. The importance of a coordinated, all-island basis for transmission planning is also reiterated through detailing key policy objectives which support the development of offshore renewable energy to align with Ireland’s NPF (National Planning Framework) and NI’s Regional Development Strategy.</p> <p><i>“The importance of such investment has been highlighted by both the UK Government and the European Commission whereby regulatory frameworks will be amended to support the energy transition, focusing on an approach of enabling strategic investment ahead of need. Such an approach should also be considered in the Northern Ireland context to futureproof required investment and to underpin much needed economic and balanced development for the region.”</i></p>	<p>There are ongoing discussions/workshops between UR and DfE on energy strategy in NI. Any future changes will be available on the UR’s website or on the energy section of DfE’s website - <a href="https://www.economy-ni.gov.uk/topics/energy">https://www.economy-ni.gov.uk/topics/energy</a></p>	<p>SONI agrees that there is a need to move to a more plan-led approach to connections and network planning to ensure timely achievement of renewable integration targets in an economically efficient manner. Due to the lead times in transmission development, this includes a need for anticipatory investment, something we hope to achieve in part with our upcoming Transmission Cluster policy. We will continue to work with DfE, the UR and other stakeholders in order to understand and enable the necessary process changes to ensure we are able to deliver the required investment. We see a strong need for a spatial energy plan to ensure both we as TSO as well as</p>

			<p>developers are able to direct investment to where it is best served to meet our licence obligations.</p>
	<p><i>[Renewable NI]</i></p> <p>RNI make the UR aware of SONI’s intention to change their approach and reiterate the need for continued collaboration with stakeholders.</p> <p><i>Quoting SONI: “we agree with industry responses of the requirement to move to a more pro-active and anticipatory approach to network development to reduce network constraints in a timely manner and deliver on renewable energy targets.”</i></p> <p><i>“RNI is keen to work in partnership with SONI to ensure that the planning and regulatory systems are favourable to renewable developments and decarbonization of our electricity system. It is crucial that a more anticipatory approach to investment is adopted.”</i></p> <p><i>“RNI maintains that whatever approach is adopted going forward, that it is vital that SONI work with industry,</i></p>	<p>We are pleased to hear RNI’s enthusiasm to work in partnership with SONI and UR. UR would encourage any stakeholder to maintain the collaborative and transparent environment required going forward.</p>	<p>SONI agree with industry responses regarding the requirement to move to a more pro-active and anticipatory approach to network development to reduce network constraints in a timely manner and deliver on renewable energy targets.</p> <p>We are committed to working in partnership with RNI, industry and the Utility Regulator on this matter in the time ahead.</p>

	<p><i>government and the Utility Regulator to increase grid capacity proactively and at pace through more anticipatory investment.”</i></p>		
	<p>[UFU]</p> <p>UFU gives the below recommendations to UR.</p> <p><i>“UFU Recommendations</i></p> <ol style="list-style-type: none"> <li><i>1. Verify that the UR can allow anticipatory investment (see Barrier 1. Grid Connection)</i></li> <li><i>2. Look at way to which regulatory approval could be expedited.</i></li> <li><i>3. A community benefits payment system could be endorsed by the Utility Regulator. We will elaborate upon this point below.</i></li> <li><i>4. Utility Regulator should be given Net Zero objectives to support the delivery of electricity networks to meet Government targets as provided within the overriding legislation</i></li> <li><i>5. Objective of being an economic regulator is retained and expanded to include wider societal benefits (e.g. access to cheaper renewable generation) These recommendations are intended to create a trusting and</i></li> </ol>	<p>We note UFU's comments.</p> <p>Regulatory approval follows our scheme of delegation. Relevant information must be provided for an informed approval and if presented it can be fast-tracked.</p> <p>We will continue to engage with the Department in regards to relevant legislation for community benefit schemes.</p> <p>Our legal vires is being considered, only under legislation can our objectives be modified.</p>	<p>3. We will be working closely with the Utility Regulator to put forward proposals for a Community Benefit model for networks in Northern Ireland. In our assessment, this could help support community and public acceptance of the network infrastructure required to deliver Northern Ireland's energy policy objectives.</p>

	<i>transparent relationship between the Utility Regulator and all stakeholders”</i>		
<b><u>Industry Engagement</u></b>	<p><i>[ESB GT]</i></p> <p>ESB don't believe SONI make it clear which parts of the accelerating electricity transmission recommendations they seek to introduce.</p> <p><i>“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.”</i></p>	<p>UR note ESB's comments and support ongoing industry engagement.</p> <p>We also encourage SONI to be clear what parts of the accelerating electricity transmission recommendations they are seeking to introduce.</p> <p>This engagement is vital for a cohesive shift of consumption towards renewables whilst protecting consumers.</p>	<p>This edition of the TDPNI reflects the position at the data freeze. SONI is currently consulting on its Strategy for 2025-2031. This includes delivery as a strategic ambition. Further detail around this can be found on pages 17 and 18 of our draft strategy<sup>8</sup>. We set out our plans for engagement on pages 21 and 22 of the draft strategy.</p> <p>Our new strategy will be reflected in the next edition of the TDPNI.</p>
<b><u>Resource</u></b>	<p><i>[Renewable NI]</i></p> <p>RNI is concerned with UR's view of network costs and the</p>	<p>We are committed to providing SONI with the required resources to operate the networks efficiently and economically to ensure security of supply for NI consumers and an environment fit for</p>	<p>SONI welcomes this commitment from the UR and looks forward to working with the UR to</p>

<sup>8</sup> [https://www.soni.ltd.uk/newsroom/press-releases/soni-seeks-views-on-draft/SONI-DRAFT-Strategy-2025-2031-Consultation-Paper\\_Clean.pdf](https://www.soni.ltd.uk/newsroom/press-releases/soni-seeks-views-on-draft/SONI-DRAFT-Strategy-2025-2031-Consultation-Paper_Clean.pdf)

	<p>level of SONI’s resources.</p> <p><i>“RNI acknowledges that to deliver development of the transmission system at a pace needed to meet the 80 by 30 obligation, SONI must have the correct resourcing and expertise. RNI is concerned that SONI does not currently have sufficient resources to complete the required modelling studies, to complete designs, to manage and deliver ARPs and NDPs on time (and, ideally, ahead of time) and provide the timely connection offers needed to meet the pressing timescales for the noted transmission system upgrades and new connections. It is vital that SONI is resourced to facilitate these crucial projects which will enable NI’s decarbonisation journey and future green growth and further delays risk endangering delivery of 80 by 30.”</i></p> <p><i>“It is important that the Utility Regulator (UR) recognises that the investments needed to incorporate a greater penetration of renewables will save the consumer money. RNI is concerned that the UR takes a narrow view of network costs when the earlier we can make these investments, the better the return will be for the consumer. RNI is keen to work with SONI to help make this case.”</i></p>	<p>renewable connection in line with its licensable activities.</p>	<p>ensure we are able to deliver a proactive transition to a lower carbon energy system for NI.</p>
<p><b><u>Project Websites</u></b></p>	<p>[Renewable NI]</p>		<p>SONI have a licence requirement to publish up</p>

	<p>Comments on projects page updates:</p> <p><i>“RNI would encourage SONI to provide more frequent updates to the Projects page of the SONI website. It currently appears that only four of the six key enabler projects have dedicated pages, with updates on both Mid Tyrone and Moyle Interconnector due to be added.”</i></p>	<p>We would also welcome more frequent updates on the Projects page of the SONI website.</p>	<p>to date information on the progression of our network projects.</p> <p>We are currently migrating to a new website and all project pages will be populated with the most up to date information once launched.</p>
	<p><i>[Consumer Council]</i></p> <p><i>Further comments on project page updates.</i></p> <p><i>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.</i></p>		<p>SONI will reflect the additional resources required to meet these expectations within our requests to the UR, including via our price control process.</p>
<p><b><u>Accelerating Renewables Taskforce</u></b></p>	<p><i>[Renewable NI]</i></p> <p>RNI reiterate the importance of establishing an</p>	<p>The establishment of the Accelerating Renewable Electricity Taskforce ("the ARE Taskforce") was a key measure. In ROI the Climate Action Plan 2023 (CAP 23), we will engage with the Department in</p>	<p>SONI will support and contribute as appropriate to any taskforce that is established.</p>

	<p>Accelerated Renewables Taskforce.</p> <p><i>“We note that more anticipatory investment, speeding up of planning and grid timelines, and a widening of the UR’s remit are issues which concern a number of policy makers and stakeholders. To ensure that the 80 by 30 obligation is met, it is crucial that an Accelerating Renewables Taskforce is created to get all of these bodies together in one forum.”</i></p>	<p>relation to the establishing an Accelerated Renewables Taskforce.</p>	
<p><b><u>Cost benefit Analysis Mechanism</u></b></p>	<p><i>[Source Galileo]</i></p> <p>Source Galileo suggest the System Needs Assessment should be taken into account in the TDPNI and raise a query on the information behind the Cost Benefit Analysis Mechanism.</p> <p><i>“Also, the Tomorrow’s Energy Scenarios (TES) ‘Accelerated Model’ is being utilised to inform future needs from a grid development perspective. However, as EirGrid is currently in the process of developing a System Needs Assessment to accompany TES, the draft Plan should take account of this needs assessment and that was published prior to the publication of TES. It would also be helpful to understand what information was utilised to underscore the underlying Cost Benefit Analysis</i></p>	<p>It will be for SONI to develop the System Needs Assessment and the TES and we look forward to engaging with SONI on these topics.</p>	<p>The TES underpins every edition of the TDPNI, as required by paragraph 1 (e) of Condition 40 of our licence. The current refresh of the TES will be reflected in the next edition of the TDPNI.</p>



	<p><i>Mechanism.”</i></p>		
	<p>[SEAT]</p> <p>SEAT suggests that a full cost benefit analysis needs to be completed on the NSI to address community concerns, like the planned EirGrid project to underground an Interconnector from Meath to Kildare. They suggest that the current figure of £119.2 million is a very engineering focused cost.</p> <p><i>“A full cost benefit analysis needs to be completed on the NSI to address community concerns. The current costing methodology used by SONI does not accurately capture all costs associated with transmission projects and creates significant resistance to such work in the communities impacted by it.”</i></p> <p><i>“EirGrid themselves are looking to underground a similar project to the NSI between Meath and Kildare. Their approach to this project is significantly different to the North South Interconnector. In this project they are accepting a full cost benefit analysis including the impact on the communities along the line of the project.”</i></p>	<p>We will continue to work with SONI and NIE networks on the benefits and costs of the North South interconnector; as with any transmission project that has progressed to the TNPP stage we expect the system operators to progress the project in line with their licence requirements.</p> <p>Further information from the system operator on the North South interconnector can be found at - <a href="https://www.soni.ltd.uk/the-grid/projects/tyrone-cavan/related-documents/">https://www.soni.ltd.uk/the-grid/projects/tyrone-cavan/related-documents/</a></p>	<p>The North South Interconnector has undergone continuous cost benefit analysis, including through processes such as the development of the Transmission Development Plan.</p> <p>The North South Interconnector received planning consent in 2020. It is a critical project for meeting Northern Ireland’s near and long-term renewable energy ambitions and seeks to resolve the single biggest renewables integration constraint on the Northern Ireland Transmission System.</p> <p>SONI has been working closely with NIE Networks</p>

			to hand the project over so construction can commence late 2024/early 2025.
<p><b><u>Grid Connection</u></b></p>	<p>[UFU]</p> <p>UFU state their optimism with the TDPNI for helping connect new RES to the network but address barriers to this process:</p> <ul style="list-style-type: none"> <li>○ UFU do not view the NIEN G99 NI generation grid application process as appropriate or sustainable.</li> <li>○ UFU are concerned with the planning process in NI (application process and subsequent decision), they address multiple factors for concern.</li> <li>○ Suggestion of necessary evolution of UR mandate.</li> </ul> <ul style="list-style-type: none"> <li>● Shift from reactionary to anticipatory.</li> <li>● Alignment of the regulatory approval process with the nature of the development of the energy system.</li> <li>● A shift in perspective from asset utilization to system optimization.</li> </ul>	<p>Any comments on the NIE Networks G99 NI generation grid application should be directed to NIE Networks.</p> <p>We will continue to engage with both system operators in regards to any future anticipatory investment to facilitate the direction to net zero.</p>	<p>SONI recognises the need for transmission network reinforcement to enable generation of all scales, from large scale generation and demand to small scale embedded generation and demand. Small scale uncontrollable generation poses a challenge for system operation, as SONI has limited visibility of its output, it's output cannot be controlled and at times has to constrain the operation of larger scale generators due to the uncontrollable nature of small scale generation. It is important to note that small scale generation is embedded within existing distribution systems, and</p>

	<ul style="list-style-type: none"> <li>○ Suggest that guidance from the TO (SONI) on community benefits should be delivered quickly.</li> <li>○ UFU to outline a defined direct payment: communities receiving a set amount of money for new visible infrastructure they host.</li> <li>○ UFU to take the opportunity to consider the community solution of microgrids.</li> </ul> <p><i>“On the 7 November 2023, for one day only, NIE Networks opened G99 NI generation grid applications, with very limited capacity available and applicants were directed to submit their applications in person at the Crowne Plaza Hotel in Belfast. 9 months later, many applicants are being informed that that some locations, connection offers cannot be made until technical specifications have been agreed and signed off by NIE Networks/SONI. Some applicants are subsequently being informed that they can have their applicant fee refunded or progressed as a zero export application. The UFU do not believe that this method of grid connection management is either appropriate or sustainable. This approach to grid connection will not bring about the additional 2-2.5GW of new renewable energy to meet the 80% renewable electricity target. If prompt action is not taken on the challenges mentioned above, this will not be accomplished. To meet our 2030 goals, the facilitation of &lt;5MW connections is crucial, in addition to the non-firm</i></p>		<p>SONI and NIEN have first and foremost an obligation to ensure security of supply for demand. This means that any measures or upgrades taken to enable small scale generation must not compromise this security of supply. Addressing these issues can in some cases be complex and could for example require expansion of existing transmission bulk supply points or establishment of new ones. Such projects can have significant lead times, and SONI and NIEN are working together to identify bottlenecks on the network and will bring forward projects to address these issues in the longer term.</p>
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	<p><i>offers for larger projects.”</i></p> <p><i>“The Planning process (application process and the subsequent decision) are much commented on as key aspects of small scale renewables, something shared with the transmission infrastructure delivery process. There is a tension between the need for infrastructure to support social and economic wellbeing and the impact that this infrastructure has on the environment, people and communities. Failure to address and resolve this tension will jeopardise our ability to meet by delaying electrification and the uptake of low carbon technologies.”</i></p> <p><i>“As the energy system, including the transmission grid, whilst it is transformed in support of decarbonisation objectives as set out in the TDPNI, a new perspective is required. This new perspective will look more to system optimisation rather than asset utilisation and account for the more decentralised and distributed architecture of the system.”</i></p> <p><i>“Residents of properties close to new overhead lines could receive a defined direct payment.”</i></p> <p><i>“UFU would like to add a further consideration in relation to community solutions; microgrids.”</i></p>		
<p><b><u>Supply Chain Issues</u></b></p>	<p><i>[Consumer Council]</i></p> <p>CCNI suggest SONI provides updates to stakeholders (at least to UR) about the impact of global supply chains on</p>	<p>SONI’s role is to plan the development of the system. Matters related to supply chains on delivery and costs of the projects will be directed to</p>	<p>SONI has established a Joint Programme Management Office (JPMO) with NIE Networks</p>

	<p>delivery and costs of their projects.</p> <p><i>“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.”</i></p>	<p>NIE Networks as the asset owner and delivered via the D5 mechanism of the NIE Networks’ price control.</p> <p>We would expect NIE Networks and SONI to engage on the future development of the system taking into consideration supply chain issues and what is best for the NI system.</p>	<p>which includes plans around forward procurement by NIEN which will go some way to addressing this issue.</p>
<p><b><u>Constraints</u></b></p>	<p>[Energia]</p> <p>Energia details efforts required to lift constraints and barriers to connections.</p> <p><i>“All efforts must be undertaken to alleviate the seriously high level of network constraints, compounded by north south tie line restrictions and high levels of interconnector imports, in Northern Ireland that limit the running hours of renewable units if NI is to achieve it’s 2030 targets. In addition to the major reinforcement works outlined in the TYDNP, it is vital that the existing network infrastructure can be leveraged to the greatest extent possible.”</i></p> <p><i>“Efforts must therefore be expedited as a matter of urgency to facilitate hybrid connections, strategically located storage, and the co-location of renewable units with storage or other technologies that can absorb surplus</i></p>	<p>UR expects SONI to continue work with NIE Networks to reduce constraints and connections barriers in NI. We are aware that SONI has been working to develop a Dispatch Down Action Plan which it plans to publish by the end of the year.</p>	<p>We recognise the challenge that dispatch down poses to the industry and Northern Ireland’s renewable integration targets, and we have convened an internal dispatch down working group to assess what measures we can take in the short, medium and long term to address this issue. We look forward to engaging with RNI and other stakeholders on this over the coming months. It should be noted that there is no barrier to a</p>

	<p><i>electricity, such as hydrogen electrolysers.”</i></p> <p><i>“It’s likewise important that the requisite market systems are put in place as soon as possible to remove existing barriers to such connections.”</i></p>		<p>generator applying for a hybrid connection to the transmission system. We are currently working on updating our Firm Access policy in part in order to account for such connections.</p> <p>Hybrid connections, strategic storage and co-location are all important parts of the future energy mix and can serve to reduce the need for network development, and work will need to be done to integrate hybrid connections into real time operation and the SEM.</p>
<p><b><u>Community Engagement</u></b></p>	<p><i>[SEAT]</i></p> <p>SEAT suggest that many of the concerns raised by communities for currently proposed projects in the TDPNI haven’t been addressed by SONI or energy policy makers.</p> <p><i>“The current model of engagement with communities impacted by energy transmission projects has been shown by the history of the NSI to be extremely deficient and unless modernised will continue to be a source of conflict</i></p>	<p>The Department published a consultation on the NI Smart systems flexibility plan earlier in 2024.</p> <p>This will contribute to the adoption of policies that facilitate active consumers and energy communities and solutions that enable people and communities to be active participants in the energy transition.</p>	<p>Please refer to page 8 &amp; 9 of SONI’s Report on Public consultation on TDPNI 2023-2032 Consultation (<a href="#">link</a>).</p>

	<p><i>and delay in the development of future transmission projects.”</i></p> <p><i>“Many of the concerns which communities will have from some of the proposed developments in this plan have already been raised by communities impacted by the proposed NSI and have not been addressed by either SONI or energy policy makers.”</i></p>	<p>We will continue to champion interaction with the Department and with the system operators to ensure engagement with communities impacted by energy transmission projects.</p>	
<b><u>Timeframe</u></b>	<p><i>[Renewable NI]</i></p> <p>RNI recommends timeframes for work on TDPNI 2024-2033 and frequency of the TDPNI document publishing.</p> <p><i>“As soon as the Needs Assessment is published in Q4 2024, the work on the next iteration of the TDP should commence and RNI maintains that this must continue on an annual basis.”</i></p>	<p>We will shortly be issuing a modification to Condition 40 of SONI’s licence to extend to consultation and reporting requirements of the TDPNI to at least two years, with an annual “revision” obligation if projects have materially changed. We would expect SONI to continually consider iterations of, and updates to, the TDPNI to ensure stakeholders have the most up to date information.</p>	<p>SONI looks forward to working with the UR to close out this licence modification process to ensure that our obligations are both achievable and meet stakeholders’ needs.</p>