

## **SONI “The Transmission Development Plan for Northern Ireland (TDPNI), 2023-2032.**

A response to the Utility Regulator’s consultation exercise of 2024.

The publication of this ten-year consultation plan is welcome; there are however some issues which I would wish to draw to the attention of the regulator and energy policy makers in N Ireland.

### **Deficiencies in planning for the emerging strategic environment for energy transmission.**

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.

### **Inadequate Cost information on the costs associated with the construction of the NSI**

Paragraph 7.4.6 of the draft transmission development plan gives the estimated cost for the Northern Ireland portion as £119.2 million. No full cost benefit analysis of this project has ever been issued publicly and a variety of cost estimate have been published over the years. This figure of £119.2m would appear to be a very tightly focused engineering cost which excludes many other costs which would be associated with it.

“It notes that North-South interconnector costs have increased from €331 million in 2021-22 to €835 million for 2022-23...” *Irish Times report, 11 April 2023.*

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”.

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.

### **Dealing with communities in planning for transmission projects.**

In the plan SONI have provided strategy statements which will guide their approach:

*In the development of the network reinforcement projects we are led by the following*

- *Inclusive consultation with local communities and landowners will inform how we plan the development the network; p41.*

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.

These include the following issues.

- The impact of property devaluation
- Loss of amenity
- The creation of a corridor sterilised by planning blight across the countryside
- Diminution of N Ireland's natural capital
- Due to the narrowly focused costing models used for transmission network planning a significant transfer of costs to rural communities with no compensation or the provision of commensurate benefits
- In the case of transnational transmission projects such as the NSI, inequitable treatment of communities impacted by the project in different jurisdictions.

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 and delay in the development of future transmission projects.

Jim Lennon

SEAT

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