



Clodagh Goodman
The Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

18 March 2025

Dear Clodagh,

SONI Evaluative Performance Framework: Annual Performance Report 2023/2024 - call for feedback

I am writing regarding the consultation on the SONI Evaluative Performance Framework: Annual Performance Report 2023/2024 - call for feedback.

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.

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.

Feedback on SONI's Annual Performance Report 2023/24

The Consumer Council welcome the opportunity to respond to the Call for Feedback, in addition to the ongoing consultation on Stakeholder Needs in which it has been involved over the year.

We note that SONI highlights the number of initiatives that it has undertaken which were not in its 2023-24 Forward Work Plan, but which are designed to support the transition to net zero, address operational issues arising from the increased proportion of renewables on the system and improve the network planning process.

We welcome SONI's willingness to adapt and refocus its priorities to deliver benefits to consumers and encourage SONI to continue to liaise with statutory and other stakeholders to keep them informed.

In our assessment of how SONI has delivered against its Key Performance Indicators (KPI's) through their Forward Work Plan 2023/24, we have outlined our feedback based on the four SONI TSO Outcomes:

- Decarbonisation
- Grid Security
- System Wide Costs
- SONI Service Quality

Decarbonisation

We welcome the discussion of how SONI's activities are supporting NI's decarbonisation journey, the Clean Energy Package and the NI Energy Strategy. We support SONI's collaboration with NIE Networks on construction offers, connections and Transmission Use of System agreements to accelerate the development of critical infrastructure and provide more secure services to consumers. We encourage SONI to increase collaboration with other bodies on which it is dependent to achieve its KPIs.

We note that SONI has not met the two decarbonisation KPIs. Notwithstanding the complexity of delivering the targets, the language used to explain the reasons for missing the targets is technical or high-level, which does not assist non-expert consumers seeking to understand the sector.

Grid Security

We support SONI's work to enhance its ability to manage the grid effectively and mitigate risks to provide a more dependable and efficient network, for the benefit of consumers. We continue to emphasise the need for SONI to strike an appropriate balance between security of supply and system-wide costs as the complexity of managing the system increases with more renewable generation and low carbon technologies coming on-line.

System Wide Costs

We support SONI's approach to optimising grid technologies, improving the efficiency of electricity flows and focusing on cost-effective solutions for grid upgrades and reducing the cost of constraints, as a recognition of the pressure on consumers from increasing electricity prices and the importance of ensuring consumers get value for money.

As we noted last year, there is only a single KPI relating to System-Wide Costs, which is calculated ex-post, and is opaque to non-technical readers. We encourage SONI, and the regulator, to provide more clarity to demonstrate to consumers that SONI is actively managing these costs.

SONI Service Quality

We are pleased to see the increased level of consultation with stakeholders, particularly the targeted approach to capture the perspectives of local communities and consumers impacted by new transmission projects. We are encouraged to see that SONI is acting on feedback to last year's Performance Report.

The increase in satisfaction scores is positive, but we are not clear whether the scores are consistent across different stakeholder groups. Communication and consultation with non-technical consumers need to be clear and use simple language to ensure they can understand SONI's role and the implication of specific projects on system security and electricity prices over varying timescales.

It will be important that this level of satisfaction is maintained during the period of significant change as the sector transitions to net zero.

We emphasise the importance, both of SONI continuing this level, and quality, of consultation and refining it based on feedback received, and of the UR ensuring that SONI uses all stakeholder feedback to ensure that SONI is incentivised to deliver outputs that stakeholders value.

We look forward to continued collaboration with the Utility Regulator and other key stakeholders so that SONI continues to work in the best interest of Northern Ireland consumers at least cost.

Yours sincerely,



Raymond Gormley
Head of Energy