

RenewableNI Feedback on SONI Annual Performance Report 2023/24

RenewableNI (RNI) is the voice of the renewable electricity industry. Through the development of policy, best practice, and public communications, we represent those engaged in wind, solar, and battery storage development. Our members make up a majority of the renewable industry supply chain in Northern Ireland.

RNI welcomes the opportunity to respond to the consultation on SONI's Annual Performance Report 2023/24. This response evaluates SONI's performance against the Evaluative Performance Framework (EPF) criteria, specifically focusing on Delivery, Stakeholder Satisfaction, and Adaptability. Our short response highlights key achievements, identifies areas for improvement, and offers recommendations to help improve SONI's future performance and ensure that progress is made toward achieving Northern Ireland's legally binding renewable electricity targets.

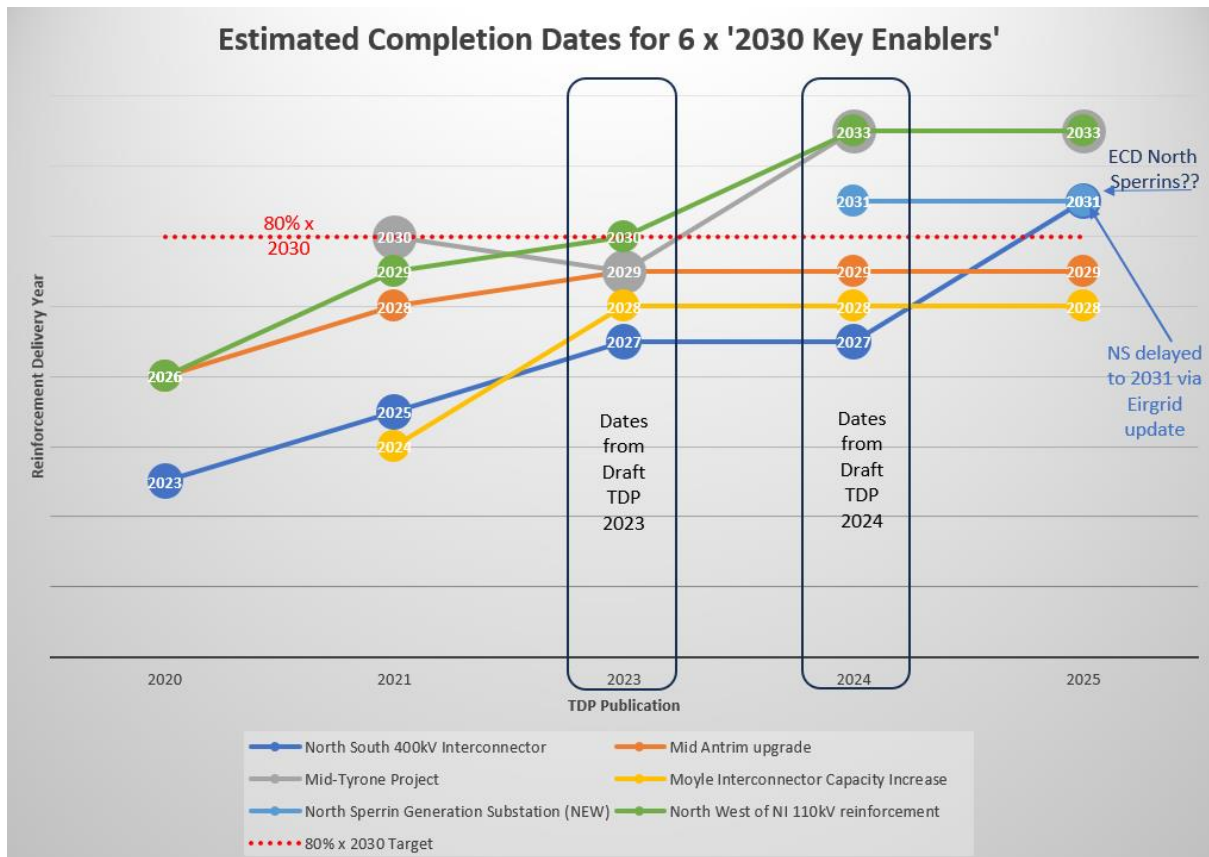
RNI's Evaluation of SONI's Performance

While SONI has successfully completed a number of key milestones, as detailed in its Annual Performance Report, there are significant concerns about delays, particularly regarding Associated Transmission Reinforcement (ATR) deliveries. ATRs are crucial to ensuring that renewable projects can connect to the grid in a timely and cost-effective manner. However, progress on ATRs has been unsatisfactory, with the six key enabler projects for achieving 80% renewable electricity by 2030 (80 by 30) experiencing continuous delays. Notably, four of these six projects are now scheduled for delivery beyond 2030, which, unless accelerated, effectively eliminates the possibility of reaching the 80 by 30 target.

It is alarming for the industry that only two of the six new-build projects deemed 'key enablers for 80% by 2030' are currently on track for delivery before the end of the decade. We believe that the government, the regulator, and the system operator should be equally concerned.

Graph 1.1 below compares estimated completion dates from the 2020, 2021, and draft 2023 Transmission Development Plans (TDPs) with SONI's latest updates for these six projects and Eirgrid's latest update on energisation of the North-South Interconnector. The graph highlights an alarming sliding scale of delivery dates from each TDP, with little evident progress over the review period, with delivery dates continually sliding with each TDP review. The proposed new generation substation in the North Sperrins, also identified as a key 2030 enabler, had not been given an estimated completion date. While a recent update from Eirgrid lists the energisation date for the North-South Interconnector as October 2031.

Graph 1.1 Estimated Completion Dates for the Six Key Enabler Projects (as of March 2025)¹



Further compounding this issue is the inadequate frequency of ATR updates. These updates are supposed to be published quarterly, but in practice, they are typically released only twice per year. This lack of timely information creates significant uncertainty for developers and generators, many of whom base financial models and investment decisions on ATR timelines. When updates are delayed or fail to provide accurate forecasts, it disrupts financial planning and increases the cost and risk of renewable energy projects. **SONI must commit to publishing updates on a quarterly basis to ensure transparency and facilitate industry planning. A regular and structured approach to these updates would provide greater confidence to developers and investors, allowing them to make informed decisions based on reliable project timelines.**

Recently in ROI, the Commission for Regulation of Utilities (CRU) commissioned TNEI to carry out an independent assessment of EirGrid’s delivery of transmission infrastructure, as the CRU believed

¹ 2025 dates are the same dates from the Draft Transmission Development Plan 2024, however updated North South Interconnector date is taken from [Eirgrid’s Q4 Network Delivery Update](#) from January 2025 which has energisation of the North South Interconnector delayed until 2031

that EirGrid was not delivering the infrastructure quickly enough². The review made a number of recommendations, including the establishment of a system to monitor key transmission reinforcement projects (priority projects) to ensure the CRU receives more detailed information on projects that will deliver the greatest impact to consumers. RNI encourages the Utility Regulator to explore similar measures, and to consider adopting elements of the monitoring system recommended in the TNEI. These updates would provide comprehensive information on project progress, causes of delays, and mitigation measures.

We acknowledge that SONI and NIE Networks have established a Joint Project Management Office (JPMO) to improve coordination on ATR delivery. We note from recent engagements with both SONI and NIE that the JPMO seeks to provide a more robust outlook on the delivery of projects, and, in theory, that the work of the JPMO should mean that any future updates on project delivery should have more reliable dates that are subject to less change. While we expect the JPMO to introduce more delays on outstanding projects, and this is regrettable given the number of delays multiple projects have already faced, we are hopeful that the work of the JPMO will mean these dates will be more reliable. We look forward to seeing the first updates from the JPMO as industry has been without updates on ATRs for close to 10 months, at time of writing.

However, beyond improving the accuracy of project timelines, SONI must outline a clear strategy for mitigating further ATR delays. This strategy should include details on how SONI intends to work with NIE Networks, landowners, and planning authorities to accelerate key infrastructure projects. Greater collaboration with stakeholders is essential to ensuring that barriers to delivery, including planning constraints and grid capacity issues, are proactively addressed rather than continuously causing delays.

We recognise and appreciate SONI's efforts to improve engagement with industry stakeholders throughout 2024. SONI made a commitment to work collaboratively, and RNI is satisfied that this commitment has been delivered through regular meetings, workshops, and engagement events. The increased level of engagement has provided industry with more opportunities to voice concerns, to collaborate on the challenges the sector faces, and to contribute to the development of solutions. **To maintain this positive momentum, SONI should continue its structured engagement with RNI and other industry stakeholders, ongoing and proactive engagement will be important in addressing new and evolving challenges and ensuring that stakeholder voices are reflected in decision-making processes.**

Adapting to changing conditions is essential in an evolving energy landscape, and SONI has demonstrated some responsiveness in key areas. One notable achievement in this regard is the publication of SONI's Dispatch Down Action Plan. This work has been well-received by industry as a meaningful step towards addressing constraints on renewable generation. We acknowledge that developing the Action Plan was a labour-intensive process that may have diverted resources from other workstreams. However, given the importance of reducing constraints, this was a necessary

² [Transmission Infrastructure Delivery Review: TNEI Report | CRU.ie](#)

and worthwhile investment of SONI's resources. It is essential that SONI continues to build on this work, ensuring that engagement efforts remain focused, transparent, and responsive to industry needs.

Although the Dispatch Down Action Plan is welcome, the effectiveness of this plan will depend on timely implementation and close collaboration with industry stakeholders. SONI must ensure that the commitments made within the plan are followed through, expedited wherever possible, and that stakeholders are kept informed of progress.

Regarding the North-South Interconnector project, we recognise that SONI has progressed the project as far as possible on the Northern side of the border. However, we note with concern that EirGrid has reassessed the estimated completion date for the interconnector, pushing it back to 2031. While this delay is outside of SONI's direct control, it highlights the broader challenge of ensuring timely grid development to meet targets.

While SONI has made progress in stakeholder engagement and strategic planning, the delays in ATRs and the slippage of critical enabler projects beyond 2030 pose a serious risk to Northern Ireland's ability to meet its renewable electricity targets.

Conclusion

We appreciate the opportunity to provide feedback and look forward to continued engagement with SONI to address these critical issues. To ensure that Northern Ireland remains on track for a cleaner, more sustainable electricity system, SONI must take steps to address the issues outlined in this response and to maintain the level of engagement with industry that RNI has been pleased to receive over the past 12 months. Strengthening industry confidence will be essential in achieving the statutory renewable electricity targets.