

CONSULTATION PAPER – SONI DRAFT STRATEGY 2025-2031

NIE Networks' Comments on SONI's Draft
Strategy 2025-2031

8th November 2024

NIE Networks welcomes the opportunity to respond to SONI's Consultation Paper on SONI's Draft Strategy 2025-2031.

NIE Networks is the owner of the transmission system, and the owner and operator of the distribution system in Northern Ireland. We have a significant interest in SONI's strategy, future plans for the transmission network and the potential impact on our own activities. NIE Networks and SONI have a duty to co-ordinate their activities and work in partnership as detailed in the Transmission Interface Arrangements.

We continue to work in partnership to develop SONI's Transmission Investment Plan (TIP) and Transmission Development Plan for Northern Ireland (TDPNI). We expect increased collaboration this year as a number of key transmission projects (load, assets and connections driven) move through approval stages to construction via our Joint Programme Management Office (JPMO). We would also welcome collaboration and co-operation on our individual strategies to enable Northern Ireland's net-zero future.

We support SONI's purpose and strategic ambitions and note the need for adequate funding through the SONI Price Control (2026 – 2031). We welcome the opportunity to engage with SONI to develop the draft strategy and encourage continued engagement to deliver the final version and its implementation, cognisant of NIE Networks' role and expertise.

While we agree that to achieve the optimum outcome, energy should be considered as a whole, the Draft Strategy should be mindful of license duties and roles and responsibilities and use clear and concise language. The draft strategy refers to SONI's role and ambitions in relation to energy and whole system planning/operations e.g. energy system(s), energy market(s) and whole system operations. We would suggest that although there are occasions when it is appropriate, this language may be confusing and cause ambiguity for readers. When dealing with topics like its role and deliverables, it may be more appropriate for SONI to use more specific language e.g. electricity system/market and transmission system operations.

SONI's strategic goal, "accelerate our delivery", highlights the need for the timely delivery of the Transmission Development Plan to improve reliability and strengthen the electricity network, as well as lower costs to consumers through the increased integration of renewable sources. Given the volume of transmission projects SONI has identified in the coming years, NIE Networks encourages SONI to engage with the UR to agree a streamlined approach for approval for transmission works. We also note our request for a full review of the D5 approval process as part of our RP7 submission to the UR.

In our response to the UR consultation on the SONI Forward Work Plan (FWP) 2024/25 we highlighted the lack of projects relating to Long Duration Energy Storage (LDES). We are glad to see that LDES is referenced in the Draft Strategy as an element of SONI's Operational Roadmap 2030.

As a key facilitator of Northern Ireland achieving its 2030 and 2050 renewable energy and net-zero targets, NIE Networks agrees with the fundamental need for "engagement, partnerships and collaboration". We look forward to working closely with SONI, being mindful of our individual roles and responsibilities and how we can work together to the benefit of Northern Ireland.



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