Ms Roisin McLaughlin Utility Regulator's Office Queens House 14 Queens Street Belfast BT1 6ED

7th June 2021

Dear Roisin,

## RESPONSE to SONI GOVERNANCE CONSULTATION DOCUMENT

The Major Energy Users Council represents the views of large energy users across the United Kingdom including Northern Ireland. In our membership, we have users operating in the Industrial, Commercial, Retail, Public Sector and Utilities arenas. The volumes of gas and electricity used by our member companies accounts for some 25% of the national demand.

We thank you for the opportunity to comment on your SONI Governance consultation. Our comments and observations are of a general nature as we do not feel we have the expertise in the technical and financial matters to argue authoritatively for or against the proposals.

## WIDER CONSULTATIONS

Most of our NI members have also business activities in GB. So having a mainly GB membership base we are quite comfortable with the concept of a totally independent system operator. So, with this in mind our preference on options would be your option D.

We are strongly of the opinion that an Independent SONI board will best serve the interests of NI customers and NI executive policy decisions as all markets move towards net zero compliance. This is the type of independence our members enjoy who currently operate businesses in GB.

However, we also appreciate that our business members operating in NI are locked into an "all Ireland" energy market with several energy companies operating in both jurisdictions and where Eirgrid plays a significant part in developing market efficiencies.

It would be short-sighted therefore to break off total contact with any new Eirgrid developments in ROI to the disadvantage of and possible non implementation in NI.

Best practice should always be available to parties in both jurisdiction and we would therefore accept that your Option C could be a useful compromise.

We thank you again for the opportunity to comment on this extensive document. We hope our general comments are supportive and encouraging as we move into the final stages of the consultation process.

Yours faithfully

