

I very much welcome the Utility regulator report and further consultation on SONI governance. The report is damning yet brings no surprises to me and others who have been worried about these issues for years including staff of both SONI and EirGrid.

This submission should be read in conjunction with my submission at the earlier stage of this investigation and consultation.

SONI is responsible for carrying out important system operator functions that are at the core of the NI electricity system and vital to the Northern Ireland economy as a whole and every consumer of electricity should be concerned about this report.

It is clear from the construct and governance of the System Operator Agreement and licence requirements that if adhered to it shouldn't really matter who owns SONI or who owns the owners even. In particular the existence of a formal dispute resolution process, that the TSOs should operate as independent entities at either side of the interfaces and the representatives on the Steering Committee and the Joint Management Committee are to come from two independent entities. The existence and operation of such an agreement also provides transparency to consumers as to accountability and process.

SONI needs to fulfil its duties to the consumers of Northern Ireland. When you look to the connection of the two respective boards and how this is intermingled. I believe this to be a massive conflict of interest in itself but how then could the board ever deal with conflict of interests or challenge? It seems also the case that the SONI boards remit and role has been greatly diminished. This means that the organisation cannot set its own strategic direction or provide oversight of the discharge of its licence obligations. It does not have a comprehensive dedicated management team or staff which is responsible for SONI TSO functions and which reports to the SONI Board. SONI Managers and staff are pooled across the group, ultimately reporting to the EirGrid group CEO who in turn reports to the EirGrid plc Board. This is wrong!

Within the report, The Utility Regulator concludes that neither the SONI Board, nor the SONI MD, has full and transparent oversight of

the management and discharge of SONI TSO licence functions and the allocation of resources available to SONI TSO.

Add to all this the revelations about EirGrid's "cross charging policy and the funds/billpayer's money that have been paid, the lack of transparency around this cost and what it actually pays for and if its value for money? The potential for higher and higher prices, the lack of ability in challenging cost, misalignment in development even. This has the potential of derailing any Energy Strategy that the Northern Ireland Government produces if it happens to be contrary to EirGrid policy. This simply cannot be tolerated! Northern Ireland consumers deserve better.

Taking this all into account and the historic and concurrent failures of EirGrid to adhere to the existing licence requirements that were applied in the past to protect Northern Ireland consumers I believe that any further measures or licence obligations will simply be ignored and abused again.

I believe that Option D, a fully independent Board, independent SONI management and staff, wholly independent from EirGrid direct management is the only way to ensure that SONI works and operates for the Interests of Northern Ireland Consumers, anything less than this arrangement would have to be closely, robustly and constantly inspected and monitored by the UR to ensure that EirGrid overreach did not occur and that good governance did not diminish to the levels currently experienced which have been deeply harmful to Northern Ireland consumers.