

Call for Evidence – SONI Evaluative Performance Framework

NIE Networks' Comments on SONI's 2021/22 Forward Plan

3 May 2022

NIE Networks welcomes the opportunity to respond to the Utility Regulator's (UR) Call for Evidence on SONI's 2021/22 Forward Plan as part of the Evaluative Performance Framework.

1. Introduction

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 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) each year.

2. General

We are fully supportive of SONI's aim to ensure closer collaboration between TSOs, Transmission Owner and Distribution Network Operator and its view that this will be a key factor in achieving the ambitions of the Energy Strategy and indeed the Climate Change Bill NI. Investment in the transmission network will significantly increase over the next decade in the approach to 2030 and it is important that collaboration and engagement is increased to achieve these joint goals.

We welcome the commitment shown in the deliverables and Key Performance Indicators (KPIs) to progressing the projects documented in the TDPNI. Bearing in mind the significant increase in the number of projects and that NIE Networks is now approaching submission of its RP7 Business Plan, we would suggest that a further deliverable for the 2021-22 Work Plan should be a full and detailed assessment of the deliverability of the TIP including all planned asset replacement and maintenance work. This is important to ensure a continued safe and reliable network into the future.

We can appreciate the time and effort that has been invested to produce such a comprehensive Forward Plan and can see how this level of detail would be required to enable the assessment panel to evaluate SONI's plans. However, as an interested party, it is quite difficult to identify the areas which may be most relevant. The table of deliverables within the Executive Summary could perhaps facilitate this if KPIs were added to each role/deliverable.

3. Outage Planning and System Access

We note that the KPIs for outage planning are System Availability and System Minutes Lost (SML), and that SML is a performance indicator for Role 1 (System Operations and Adequacy) as a whole. The KPI for Role 3 (System Planning) is to progress the identified SONI driven, network development projects within the TDPNI in accordance with the specified timeframes.

In addition to network development projects, the TIP and TDPNI also include asset replacement and maintenance works identified by NIE Networks. In order to ensure that the plan is considered in its entirety we would expect deliverables and KPIs in this area to consider all three aspects of the plan.

Timely maintenance of existing assets and replacement of end-of-life equipment are essential to maintaining a safe and secure transmission network in the longer term. This is consistent with SONI's licence condition 20(12) which states *'The Licensee shall cooperate with, and assist, the Transmission Owner in complying with its obligations under the Transmission Owner Licence regarding the development and maintenance of the transmission system.'*

We consider that System Availability and SML are not appropriate measures of a holistic approach to transmission system management and may in fact counteract it. We would propose some further indicators that would consider all aspects of the plan:

KPIs

1. % outage availability for maintenance plan
2. % outage availability for asset replacement plan
3. % outages cancelled
4. E600s approved within agreed timescales

Deliverable

5. All overdue Critical Plant maintenance and Protection Testing to be facilitated within 12 months of being requested
6. T&M requests to be approved at least three days before work is to be carried out

We fully acknowledge that system stability is crucial and that there are many factors that contribute to the amount of work and number of outages that can be facilitated at any particular time. If limitations mean that the whole plan cannot be facilitated within an outage season, we would expect NIE Networks and SONI to jointly prioritise the work elements. The KPIs within this framework should adequately allow for this.