



Response to the consultation on modifications to the SONI TSO licence

4 March 2022

Manufacturing NI represent some 550 manufacturing businesses across every constituency represented in the NI Assembly.

We are a wholly independent voice on behalf of manufacturers who are amongst the largest energy users in Northern Ireland. They ask that we work on energy issues to ensure competitiveness within the UK, on the Island and Ireland and in markets in Europe and globally as it impacts significantly on their ability to trade and sustain jobs. Our independence on energy issues is critically important to them and us. To deliver this on energy issues we engage but do not accept financial contributions from energy firms or have their representation on our Board or sub-groups.

Consultation: Our Response

We commend the Regulator on their thorough approach to this important question. Care appears to have been taken to not only engage with consumers but with the company and considered the new policy framework governing energy in Northern Ireland now and in to the future.

It is in that context where we believe that the choice of Option C was correct and has out strong support. This is particularly important now given recent global events around energy our security crisis, commodity volatility and war in Europe.

Northern Ireland needs confidence that the governance structures of SONI, as a monopoly but also a critical part of our energy system, is wholly representing interests of Northern Ireland consumers who pay for its entire funding and who will be critical to deliver on the new energy strategy adopted by our elected representative on behalf of the people of Northern Ireland.

We share and believe the Regulator has correctly found that the three principal concerns below are a huge risk for consumers which must be addressed through confidence in the governance model.

- inappropriately higher prices for Northern Ireland consumers,
- misalignment of Northern Ireland policy and the SONI approach to network development
- barriers to competition

Modifications

1. We fully support the model of governance and the proposed timeline outlined in 7.2 - 7.4 in relation to the SONI Board.
2. In addition, we fully support the proposals outlined in 7.5 – 7.10 in relation to operational independence of local management.
3. We agree with the Regulator’s approach as explained in 7.14, 7.17 and 7.20. Taken collectively, this provides for a smooth transition and to safely secure for consumers benefits if they are to be had now and in to the future and assurance that the requirements of this governance independence will be delivered in a timely manner.

Conclusion

We welcome this work by the Regulator and the chance to respond to the consultation.

No one should fear transparency, accountability and independence. That creates confidence from consumers, those who pay for this entire market.

We are happy for this response to be published.