



Jody O'Boyle & Timothy Steele  
The Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

24 June 2022

**Re: SONI's Draft Transmission Development Plan 2021-2030**

Dear Jody and Timothy,

I am writing regarding the consultation on the SONI Transmission Development Plan 2021-2030.

**The Consumer Council**

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland (NI).

The Consumer Council has specific statutory duties in relation to energy, postal services, transport, water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

**The role of SONI in delivering for Northern Ireland Consumers**

As TSO for Northern Ireland, SONI plays an integral part in forging on with the development and rollout of the Shaping our Electricity Future Roadmap.

Since 2009, SONI's role and influence on NI's electricity market has grown, taking over the planning of the transmission network in 2014, being central to the design and management of the Single Electricity Market (SEM) and now helping to inform the development of the Energy Strategy for NI<sup>1</sup>.

**The TDPNI 2021-2030**

The Consumer Council responded to the Utility Regulator 2020-2029 TDPNI and subsequent Shaping Our Electricity Future consultation. Publication of the Northern Ireland Energy Strategy, the energy crisis, and Ukraine invasion which has exacerbated the energy price crisis have all occurred since these consultations took place. The latter two developments serve as a stark warning the generation of indigenous energy, as outlined in the Energy Strategy, is an urgent priority for Northern Ireland.

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<sup>1</sup> <http://www.soni.ltd.uk/about/strategy-2025/>

The Consumer Council recognises the 70% RES-E target<sup>2</sup> will impact upon power system planning, there are logistical challenges of completing larger projects traversing overland, particularly the North South interconnector, and ensuring sufficient dispatchable capacity is essential.

As renewables are capital intensive this transition will require significant financial investment. It is imperative that infrastructure development is optimised to reduce the cost impact on the consumer. It is also essential that planning continues to be undertaken in consultation with end users at a regional and local level to ensure consumer needs are met.

However, we also note the benefits of such infrastructure investment, including the reduction of constraints on wind generation and increased viability of power export. Ideally, the increase in indigenous renewable generation will result in stable or lower consumer bills and indigenous security of supply in the long term.

The Consumer Council recognises the important role the Utility Regulator will play in overseeing the development of the pathway to a renewables-based power system and in safeguarding consumers during the transition. We also welcome SONI's commitment to maintaining the reliability of the electricity supply and minimising the overall cost to the electricity consumer.

We are pleased to see SONI's commitment to significant engagement with the gas industry, but also reiterate the advantages of continual engagement with stakeholders, communities, and consumers.

The Consumer Council looks forward to on-going collaboration with the Utility Regulator regarding the protection of NI consumer interests.

Yours sincerely,



**Raymond Gormley**  
**Head of Energy**

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<sup>2</sup> <https://www.soni.ltd.uk/media/documents/TDPNI-2021-draft-following-SONI-consultation.pdf> p.19