



SONI's Transmission Development Plan for Northern Ireland 2021-30

Decision Paper – 18 October 2022





About Utility Regulator

Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive leads a management team of directors representing each of the key functional areas in the organisation: Corporate Affairs, Markets and Networks. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.



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Our mission

To protect the short- and long-term interests of consumers of electricity, gas and water.

Our vision

To ensure value and sustainability in energy and water.

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Our values

- Be a best practice regulator: transparent, consistent, proportionate, accountable and targeted.
- Be professional listening, explaining and acting with integrity.
- Be a collaborative, co-operative and learning team.
- Be motivated and empowered to make a difference.





Abstract

SONI is the Transmission System Operator (TSO) for Northern Ireland and is responsible for ensuring continuity of electricity supply for homes and businesses across Northern Ireland. In order to do so SONI must plan investment in the transmission network.

The Transmission Development Plan for Northern Ireland (TDPNI) 2021-2030 is the proposal for the development of the NI transmission network and interconnection over the ten years from 2021. This plan presents projects that are expected to be needed for the operation of the transmission network in the short and medium-term.

Audience

This document is likely to be of interest to regulated companies in the energy industry, government, industry groups, consumer bodies, environmental groups and those with an interest in the energy industry and network planning.

Consumer impact

The TDPNI provides clarity to consumers on:

- 1) The drivers of electricity transmission investment;
- 2) The need for action in delivery of key infrastructure projects;
- 3) The location and activity of network investment; and
- 4) The estimated cost and timing of project completion.





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Executive Summary

The Transmission Development Plan for Northern Ireland (TDPNI) 2021-2030 covers the proposals for the development of the NI transmission network and interconnection over the ten years from 2021. This plan presents projects that are expected to be needed for the operation of the transmission network in the short and medium-term.

The TDPNI will help to achieve the strategic objectives as laid out by national and EU policies. The strategic objectives include:

- a) Ensuring the security of electricity supply;
- b) Ensuring the competitiveness of the national economy;
- c) Ensuring the long-term sustainability of electricity supply.

In accordance with its' licence (Condition 40), SONI must prepare a TDPNI every year. Under Article 22(4) of Directive 2009/72/EC, Utility Regulator (UR) must then consult on the draft TDPNI prepared by SONI.

As part of this process, SONI has consulted upon a plan and submitted a draft TDPNI to UR for consideration. UR has <u>consulted</u> on the draft plan, sharing stakeholder views with SONI.

Both UR and SONI have considered the responses. This paper sets out the findings of the consultation and final decision of UR regarding approval of the 2021-2030 TDPNI.

1. Introduction

Background

- 1.1 SONI is the independent electricity Transmission System Operator (TSO) for Northern Ireland. As part of its function as TSO SONI has a licence obligation under Condition 40 to produce a Transmission Development Plan for Northern Ireland (TDPNI).
- 1.2 SONI has consulted upon a draft TDPNI for 2021-30. Results have been considered and an updated plan has been submitted to UR.
- 1.3 Under Article 22(4) of Directive <u>2009/72/EC</u>, UR must then consult on the draft TDPNI prepared by SONI. URs consultation closed for comments on the 24 June 2022.
- 1.4 This paper details the findings of the consultation and the subsequent decisions by UR.

Related Documents

- 1.5 UR consulted on the SONI Draft TDPNI 2021-30. This was accompanied by:
 - a) SONI Report TDPNI Consultation Responses;
 - b) SONI Report SONI Response report
 - c) Strategic Environmental Assessment (SEA) <u>Environmental Report</u>; SONI produced an Environmental Appraisal Report (EAR) (<u>link here</u>) assessing TDPNI 2021-2030 against the SEA accompanied with the TDPNI 2018-2027.
 - d) Habitats Regulation Assessment (HRA) Report.
- 1.6 This paper should be read in conjunction with:
 - a) SONI Final TDPNI 2021-30 Report;
 - b) UR Consultation Stakeholder Responses.

2. Overview

TDPNI

- 2.1 SONI's TDPNI 2021-2030 is the fourth such plan that they have had to complete. This ten year plan undertakes a variety of functions including:
 - a) Approach & Strategy for developing Northern Ireland Electricity Grid;
 - b) Detailing Network Investment needs;
 - c) Details planned Network Developments
 - d) Describes the TSO's planning process;
 - e) Details project information i.e. category, planning area, location, activity, estimated cost and completion date.
 - f) Integrates SONI's Tomorrows Energy Scenarios
 - g) Integrates projects identified within SONIs Shaping Our Electricity Future
- 2.2 The TDPNI describes 76 different projects under this plan. Of this, 39 are NIE Networks asset replacement projects and 37 are network development projects. On a region and project category basis, they are captured as follows:

Table 1: Projects by Planning Area and Category

Projects by Planning Area and Category				
Project Category	North-West	South-East	Both Areas	TOTAL
New Build	9	6	0	15
Uprate / Modify	9	7	4	20
Refurbish / Replace	0	0	0	0
Combination/ Other	0	2	0	2
TOTAL	18	15	4	37

- 2.3 SONI's expenditure on transmission development projects due for completion over the period 2021 2030 is estimated at £54.2m¹. Estimated TO costs associated with these projects is £508.1 million
- 2.4 Estimated TO (Transmission Owner) costs associated with the Asset Replacement plan is £168.9m.
- 2.5 Total estimated costs of all projects detailed within SONIs 2021-2030 TDPNI is £729.4m.
- 2.6 UR will determine the amount that can eventually be recovered from customer and generator tariffs for these projects. Link to these TO costs & estimated completion dates can be found here within NIE Networks RP6 Final Determination. Costs related to projects post RP6 will be subject to regulatory approval of NIE Networks RP7 price control.
- 2.7 To allow for comparison of transmission development projects on a year-on-year basis, data is represented at a fixed point in time referred to as the data freeze date. The data freeze date of TDPNI 2021-2030 was 1st July 2021.
- 2.8 In regards to the Strategic Environmental Assessment (SEA), it should be noted that the SEA has a five year lifespan and was carried out on the TDPNI 2018-2027. The environmental report and shadow Habitats Regulations report are available on SONI's Website.² The main findings of these assessments have influenced and are incorporated into the Plan.
- 2.9 SONI has also produced a report summarising the feedback received from its own consultation. It details the TSO responses to issues raised and determines if subsequent changes are required to the initial version of the TDPNI to the updated plan consulted upon by UR. This report is available on SONIs website here.

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¹ This figure is the amount required to bring projects to the point of handover to NIE Networks and to support NIE Networks during the construction and commissioning phase

² http://www.soni.ltd.uk/the-grid/projects/tdpni/related-documents/

3. Findings

Consultation Responses

- 3.1 Thirty three responses to UR consultation were received. Seven are published alongside this decision paper, while the remaining respondents have requested that their full response remain confidential. The seven submissions were provided by
 - CCNI
 - Energy Saving Trust
 - Mutual Energy
 - NIE Networks
 - Renewable NI
 - Mr Hutchinson
 - Mr Todd
- 3.2 The responses that were received focus particularly on the integration of increased renewables onto the NI system, grid development and its associated processes. Responses also references the transition towards net zero targets including the targets set with the introduction of the Climate Change Act and the actions set out within the Departments Energy Strategy. As well as the importance of co-ordinating with the Gas Industry with the view of a whole system approach and the development of the North South Interconnector regarding Security of Supply.
- 3.3 This chapter summarises the non-confidential stakeholder views and provides UR thoughts.

Table 2: Views and Responses

Issue	Consultation Response	UR Response
Network Investment	[NIE Networks]	
	We recognise that investment in the transmission network will significantly increase over the next decade in the approach to 2030 and that this will be challenging for both SONI and NIE Networks to deliver. NIE Networks is also currently developing its plans for RP7 which will include some additional transmission asset replacement projects. Through the TDPNI working group, a detailed exercise to assess the deliverability of both NIE Networks' RP7 plans and SONI's TIP is underway	New development and upgrading of network infrastructure is critical to Northern Irelands increasing demand therefore expanding the network to allow for increased renewable connections onto the NI system is critical to meeting our RES targets. We expect SONI and NIE
	which will include an assessment of	Networks to engage

	resourcing, outage availability, etc	constructively through the framework of the TIA to ensure that connections and the development of the network infrastructure are efficiently completed to enable the increase of renewables to meet NI RES targets.
Role of SONI in	[CCNI]	
delivering for NI 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	Whilst SONI have undertaken a number of consultations to help inform the pathway in which the Transmission system is developed, SONIs business strategy has changed along with the changing landscape of the Electricity Network and Government targets and aims. However, SONIs main objectives as the TSO for NI have not changed and this is to ensure the safe, secure, economic and reliable electricity network for all NI consumers.
		The Department for Economy's new energy strategy may develop new policies that may assist SONI in their management of the NI Transmission system.
Renewable Targets	[CCNI]	
	We recognise the 70% RES-E target 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	We welcome CCNI comments in regards to the optimisation of costs and reduction of costs for NI consumers particularly in the current economic climate with increasing energy prices. The TDPNI sets out the network investment required to build out and upgrade the infrastructure for NI to meet its RES
	planning continues to be undertaken in consultation with end users at a regional and local level to ensure consumer needs are met.	targets, including other critical asset replacement projects undertaken by NIE networks. Whilst network infrastructure build and

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.

replacement investment is needed to achieve these targets, work streams such as NIE Networks flexibility trials are being undertaken to analyse and assist network congestion in those areas where there are high levels of constraints. This will have the potential if successful to avoid higher network infrastructure costs in the future.

However, this alone will not solve network congestion and without the development of the network infrastructure will result in further decrease in capacity and increase constraints.

We encourage that both NIE Networks and SONI continually engage with national and local communities in their development of the NI network.

[Energy Saving Trust]

In planning to meet Northern Ireland's future commitments, investment will be needed in new renewable generation capacity and electricity networks. The transition to low-carbon and renewable will have widespread energy consequences; it will require a significant transformation of the electricity system. When planning for nearly zero carbon power, 2030 is simply a staging post and proposals for 1GW of offshore wind power and significant solar as outlined in The Path to Net Zero Energy, Safe, Affordable. Clean. (economy-ni.gov.uk) will invariably require to be facilitated.

Having passed Final Stage on 9th March, the Climate Change (No. 2) Bill will increase NI's renewable electricity generation target, upon receipt of Royal Assent. Draft (niassembly.gov.uk) The Bill states: "15.— (1) The Department for the Economy must ensure that at least 80% of electricity consumption is from renewable sources by 2030." We are aware that currently this development is

We welcome Energy Saving Trust acknowledgments on the challenges and the obstacles that all industry parties will have to overcome and engage collaboratively to develop and implement the Departments New Energy strategy, this ranges from the development of polices, implementation of legislation and also the introduction of new technologies in the changing landscape of our network and generation portfolio in the journey to reach RES targets.

It is imperative that network investment is delivered at the correct locations and at the pinch points of our electricity system to enable

	being considered, and the revised TDPNI although written prior to this development should really be revised further to be reflective of it	and drive the investment that will enable the downward pressure on the overall cost to consumers.
	We would support the Network reinforcement projects described in the North and West Planning Area which will enable the transmission network to safely accommodate the more diverse power flows which are a result of excess regional generation. It is vital that transmission system developments keep pace with the connection of new renewable generation, otherwise constraint levels will almost certainly make future renewable investments less viable and potential carbon savings will not be realised.	
	We recognise that to deliver developments of the transmission system in line with the 80% by 2030 target SONI will require considerable resources. It is important to realise both current consumer cost increases and the savings likely to be achieved by this investment. NIE Networks for Net Zero study networks-for-zero-net.aspx (nienetworks.co.uk) shows that due to downward pressure increased renewable generation has on the wholesale price of electricity, that there will be a net consumer saving of 1% after taking account of all the necessary grid investments	
	[Renewable NI] In essence, the current draft TDPNI is unlikely to be sufficient to meet the requirements needed in order to achieve 80% RES-E by 2030. If the revised TDPNI cannot be amended to reflect the 80% target accordingly, then we request that some reference to this is included in the new Section 1.8 'Changes Sine the Freeze Date'. The target of 1GW of offshore wind from 2030 should be reflected, outlined in the Energy Strategy Action Plan 2022 as well as the 900MW solar envisaged in the Accelerated Ambition scenario in the SONI Tomorrow's Energy Scenarios.	We welcome and acknowledge Renewable NI comments regarding the inclusion of offshore and solar. SONI have commented that future iterations of the TDPNI will be updated to include projects that meet the requirements of our 80% RES target, along with the review of their Shaping Electricity Future publication
Gas Industry Co- ordination / Whole	[Mutual Energy]	
System Approach	We set out in our response to SONI's	We welcome Mutual

consultation on the previous draft TDPNI 2021- 2030 our understanding that, after having coordinating closely with Northern Ireland Electricity Networks ("NIE"), all scenarios included by SONI in TESNI 2020 assumed a high degree of demand electrification across all potential sectors (including heat and transport, etc.) and that the gas grid would effectively be decommissioned by 2050.

However, given the ongoing extensive uncertainty regarding optimal paths to net zero energy, failure to properly assess a diverse range of counterfactual net zero energy system scenarios is very likely to result in sub-optimal outcomes for consumers and certainly an inability to demonstrate conclusions (including transmission investment plans etc.) to be in those best interests. We therefore welcome the agreement in SONI's consultation report with our suggestion that closer engagement with the gas industry is required.

Mutual Energy therefore recommend engagement with UR would be beneficial on the expectations and structuring of cross-sectoral network planning which will promote delivery of outcomes in the interests of NI consumers. Formalising the engagement will also help, in the longer term, with delivery of the NI energy transition, including management of any security of energy supply risks and may help to inform future relevant energy and related policy considerations.

Energy's recommendation regarding cross-sectoral engagement.

The path to a net zero energy system will no doubt be challenging for all industry sectors however. UR would encourage all parties across all energy sectors to engage and work collaboratively in the development of a whole system approach, combining all technologies, initiatives for the development and transition to net zero, ultimately for the benefit of NI consumers at the lowest cost possible.

Interconnection

[Mutual Energy]

We have welcomed inclusion of the 'Moyle 275 kV Reinforcement' project in the plan, which would permit full use of Moyle's technical 500 MW capacity. Moyle's export capacity has historically been restricted by limitations on the GB system but these restrictions have been lifted since April 2022, so the NI system limitations mean the maximum export that can be facilitated is 400MW. We note that the estimated completion of this project remains 2024, but understand that meeting this date will be very challenging.

UR welcome the increase of Moyle's export capacity, albeit with the challenges in meeting the completion date. The increase of Moyle's export capacity is an important factor in reducing NI renewable constraints, in an evolving energy system that has a target of 80% renewables.

[Energy Saving Trust]

We fully support the development of the second North-South interconnector. While it is disappointing that the delivery date has slipped, we are aware of the planning difficulties that the project has faced. We recognise that a substantial proportion of current constraints of renewable generation in Northern Ireland would be removed when the North-South interconnector is complete and the full integration of the 500MW export capacity on the Moyle interconnector is realised and welcome the proposed dates for each.

We welcome Energy Saving Trust comments regarding the North-South.

The North-South is critical to NIs Security of Supply along with the Moyle Interconnector. Having both lines operational at over 400MW export capacity will provide that welcomed capacity for the increase of renewables on NI system, whilst also reducing high level of constraints.

Dispatch Down

[Renewable NI]

Curtailment levels in NI have also followed a similar trend with SNSP increases failing to have a significant impact. Mullan Grid assess minimum generation levels of conventional plant (min gen) as being the predominant driver of curtailment and note that between April-December 2021 min gen was responsible for all curtailment across the island.

is vital that transmission system developments keep pace with the connection of new renewable generation, and we see a corresponding ramping down of min gen, otherwise constraint levels will make future renewable investments unfinanceable and potential carbon savings will not be realised

In the transition to our 80% RES targets it is critical that the network investments that is outlined within the TDPNI deliver the capacity on the system for the connection of renewables and ultimately decreasing the level of constraints and curtailment, while also lowering min gen levels and increasing SNSP.

It is welcomed this year regarding SONIs achievement on the completion of reaching 70% SNSP, however this will have to increase further to reach our RES Targets. The North-South and the increase in Moyle's export capacity will assist this in the future.

Keeping & lowering min gen levels further will be a challenge with our current thermal generation portfolio though further innovation and technologies as mentioned by Renewable NI shall assist with lower these levels in our zero carbon energy system

		We expect SONI and NIE Networks to engage efficiently through the frameworks of the TIA to ensure that the network investments are delivered to enable higher renewables onto the systems to lower constraint and curtailment levels.
<u>Contestability</u>	[Renewable NI]	
	As yet, there is no process by which third parties can bid to deliver transmission system infrastructure. At the distribution level, contestability can in some cases deliver new infrastructure quicker and more cheaply than achievable by NIE Networks. RNI believes that the introduction of contestability for transmission infrastructure could bring a greater resource to help enable us to achieve our decarbonisation ambitions.	We welcome Renewable NI comments on Transmission Contestability, work continues with various working groups. Further information can be found here.
Quarterly ATR reports	[Renewable NI]	
	We welcome the publication of the Q1 2022 ATR Status Update on 2nd March but notes that this is the first such update since 2nd November 2018. ATRs are a contractual obligation on SONI and are necessary to deliver firm access in a meaningful way. RNI members are increasingly frustrated by the continual delays in the delivery of ATRs. While we appreciate that issues such as planning delays, are to a large extent outside the control of SONI, we hope that SONI can at least now provide ATR updates on a quarterly basis to at least keep the customer, and wider industry, informed. Following the publication of the update in March, RNI hopes that updates will continue on a regular basis and would welcome another update in June or July 2022.	We welcome the publication of the recent ATR report by SONI. It is disappointing that this is the latest report since 2018 therefore, we would encourage SONI to publish their ATR reports on the quarterly basis. This provide important information for the connection of generation assets and the availability of firm access and identifies network limitations.
OffShore Connections	[Renewable NI]	
	As yet there is no clear process for applying for an offshore connection. While we are unlikely to see turbines in or on the water until the end of the decade, developers are planning projects now, with the North Channel	We welcome Renewable NI comments regarding the connection of offshore wind. DfE's new energy strategy has identified the need for action plan to

Wind floating project the first to be publicly announced.

RNI notes that SOEF plans for 100MW of offshore wind, however, any planned offshore project will be of a considerably larger scale. It is important that SONI collaborates with industry to ensure that as developers are planning offshore projects that SONI is simultaneously putting in place the infrastructure needed to bring projects onshore. In this regard, we welcome SONI's recent commitment to establish an Offshore working group between industry, SONI and NIE Networks.

deliver 1GW of offshore wind by 2030. There are a number of industry working groups underway to assist in the delivery of this action plan.

Offshore connections will be important in our delivering our RES target and our net zero energy system

Resource

[Renewable NI]

We appreciate that to deliver development of the transmission system at a pace needed to meet the 80 by 30 target, that SONI must be sufficiently resourced. We are concerned that SONI do not currently have sufficient resources to complete the required modelling studies and provide the timely connection offers and studies needed to meet the very pressing timescales for the noted transmission system upgrades and new connections.

NIE Networks for Net Zero study shows that due to the downward pressure increased renewable generation has on the wholesale price of electricity, that there will be a net consumer saving of 1% after taking account of all the necessary grid investments. RNI's Achieving Zero study estimates that going from 70% to 80% will result in an additional consumer saving of £50m. It is noted that since previously consulting on the TDPNI 2021- 2030 in March 2022, the NI Assembly has amended the RES-E target for 2030 from 70% to 80%

ONI have not yet updated the target from 70% to 80%, but have noted that future updates to their TDP will reflect these improved targets. Therefore, it should be noted that even in approving this TDP, it is unlikely to deliver on the targets set by the Assembly in March of this year.

We acknowledge
Renewable NIs comments
regarding SONI resource
capabilities.

Under Condition 3 of SONIs Transmission Licence, on an annual basis SONI submit a Directors statement that confirms the Licensee, as the TSO at all times act in a manner calculated to secure that it has sufficient resources (including management resources, financial resources and financial facilities) to enable it to carry out TSO business and obligations under legislation, networks codes and regulatory frameworks.

To date, SONIs directors statement does not signal any resourcing issues regarding their delivery of licence obligations set out within Condition 3.

Through the appropriate licence mechanisms UR are committed to providing the appropriate investment to allow SONI to deliver their obligations set out within their Transmission Licence

Castlereagh Main and	Responses to UR consultation were	
Rosebank Substation	received from residential consumers	
	expressing concerns regarding the	
	redevelopment along the Castlereagh	
	Main and Rosebank Substation route	
	including its tower lines.	
	The residential consumers within the area raised concerns over the reenergisation of the line in close proximity to their residential properties.	
	SONI and NIE Network have meet with the residents of the concerned areas. Please see SONIs response report on UR consultation regarding an update on the network development.	

3.4 UR have engaged with SONI and NIE Networks regarding the responses received to our consultation. In our engagement, both parties have provided a response document in relation to responses received from UR consultation on SONI TDPNI 2021-2030. These are published along with this decision paper. SONI and NIE Networks may engage with all respondents regarding their responses received by UR.

Residents Non Confidential responses to UR consultation has been published

along with this decision paper.

4. Conclusions

Decision

- 4.1 UR welcomes the responses and engagement from stakeholders on SONIs draft TDPNI completed by SONI. We acknowledge from the responses provided within SONIs consultation and UR's consultation, that the focus on increasing renewables on the system along with the importance of grid development projects and the North / South remain key to delivering on net zero targets and Northern Irelands 80% RES targets.
- 4.2 Whilst UR acknowledge that the levels of overall curtailment and constraints remain high and are increasing, the planned network developments and the capacity this offers over the time period of this and future TDPNIs are critical to an electricity system that must evolve to accommodate new technologies to lower min gen levels and reduce Northern Irelands reliance on thermal generation.
- 4.3 UR recognises that with the delivery of the Department of the Economy's New Energy Strategy, there are important action plans, legislation reforms

that are to be delivered and implemented in our journey toward 2030. UR are committed to working with all corners of the energy sector to enable and collaborate for the delivery and implementation of the Department New Energy Strategy.

- 4.4 SONI in consultation with Republic of Ireland System Operator and Northern Ireland Distribution Operator and Transmission Asset Operator has set out the TDPNI and the required network investment and related TO asset replacement requirements for the period 2021-2030. It is critical that both SONI and NIE Networks, engage and work collaboratively under the framework of the Transmission Interface Arrangement to deliver these projects and the connections associated with them.
- 4.5 UR welcome the community engagement that both SONI and NIE Networks have had to date in regards to projects set out within the TDPNI. We encourage SONI and NIE Networks to continually place community engagement at the forefront of Northern Irelands network infrastructure development.
- 4.6 It is the decision of UR that the 2021-2030 TDPNI provided by SONI in accordance with Condition 40 of SONI's TSO licence, be approved and published accordingly.
- 4.7 As indicated in the consultation responses and UR's review of the 2021-2030 TDPNI, there are a number of information areas which we would like to see continued as part of the report and additions to be considered in future plans. This includes the following:
 - 1) Inclusion of projects to reflect the 80% RES targets of the Climate Change Act.
 - 2) Projects labelled to identify that they are an addition or new project from the previous year's TDPNI.
 - 3) Provide commentary as to the rationale for extending completion timelines, delayed delivery of projects within the TDPNI, where applicable.
 - 4) Continued detail on new renewable capacity including high level projected connection dates per project that focus on the net zero targets. Where these can be found in other public information, the relevant documentation shall be referenced.
 - 5) Continued monitoring of estimated versus actual spend regarding ongoing and completed projects where information is available.
 - 6) Integration of responsibilities of the TSO regarding grid development

that shall be delivered from the New Energy Strategy.