

RenewableNI response to SONI Forward Work Plan for 2022/23

RenewableNI (RNI) is the trade association and voice for the renewable electricity industry in Northern Ireland. We represent over 50 businesses, fostering knowledge exchange, sharing best practice and supporting policy development. Engaged in wind, solar and battery storage, our members make up a large majority of the renewable industry supply chain.

RNI welcomes the opportunity to respond to SONI's Forward Work Plan for 2022/23.

Policy Context

The UK Government has set in legislation a requirement for a 'net zero' economy by 2050. As the leader in decarbonisation, the power sector will have to achieve zero carbon first, with heat and transport expected to significantly electrify as the main way of cutting emissions. The International Energy Agency has stated that all advanced economies must achieve zero carbon power by 2035¹ and the UK Government has made a commitment to achieve this².

Working in conjunction with Wind Energy Ireland, RNI is committed to driving policy to deliver zero carbon power on the island of Ireland by 2035. This can only be achieved if the necessary level of renewable generation and the required zero carbon system services, are facilitated by the electricity network.

RNI therefore welcomes the publication of the SONI [*Shaping Our Electricity Future Roadmap*](#) (SOEF) which sets out the necessary upgrades required to facilitate an additional 1.5GW of onshore renewables by 2030. This has recently become more crucial as Stormont agreed a goal of 80% renewable energy by 2030 for Northern Ireland.

Summary points:

RNI appreciates the emphasis on the importance of stakeholder engagement throughout this report, as well as the associated improvements in SONI's engagement workstreams. We welcome the clear communication of the deliverables for SONI's Forward Work Plan 2022-23, along with the provision of an industry workshop. In line with our response to the consultation on SOEF V1.1 which was published earlier this year, we would emphasize the importance of SONI continuing to deliver what was agreed upon in the Shaping roadmap, develop the necessary infrastructure and regulatory

¹ Pg 20, [*Net Zero by 2050*](#)

² <https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035>

framework to allow for further offshore development, and develop upon the overall vision and legal requirements to achieve net zero, looking beyond 2030. We will structure our response in accordance with each role outlined in the report.

Role 1: System Operation and Adequacy

RNI appreciates the ongoing work on the detailed design of the Scheduling and Dispatch solution, along with the associated industry engagement on this. It 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.

RNI has been engaging with SONI for a number of years on the need to complete updated dispatch down analysis. The last analysis for NI was completed in 2015, whereas there has been dispatch down analysis completed in Ireland in 2019 and 2021 and updated analysis to be published in Q4 2022. Providing analysis of constraint and curtailment levels is critical for the development of renewable projects. It also helps highlight the benefit of the network reinforcements being planned by SONI. Considering the 2030 RES-E targets and the new sets of connection offers being issued by NIE/SONI, it is critical that SONI complete dispatch down analysis in 2023. RNI would also welcome being involved in supporting SONI in the development of input assumptions and scenarios for the analysis.

With regards to RES-E targets, we understand that the target for this for the upcoming year is under review. We welcome the communication of this figure once it is calculated and would encourage SONI to take into account the ambition needed here in working towards meeting the goal of 80% RES-E by 2030.

Role 2: Independent Expert

Although Role 2 includes the delivery of the TDPNI, we note that there is no target regarding the publication of a TDPNI next year. We would query if a decision has been made on this following the recent consultation on the proposed modification to SONI's transmission license – Condition 40.

We appreciate the communication of the timelines corresponding to the SOEF Advisory Council meetings. Advanced communication of stakeholder engagement plans assists in enabling more proactive communication and opportunity to engage.

Role 3: System Planning

RNI fully supports the development of the second North-South interconnector. We appreciate the inclusion of milestones with regards to progressing this in Role 3 of the forward workplan.

A substantial proportion of current constraints of renewable generation in Northern Ireland would be removed when the North-South interconnector is complete, and we therefore look forward to its construction.

Role 4: Commercial Interface

RNI appreciates 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.

With regards to progression on items relating to Low Carbon Inertia Services, we believe that the requirements for additional low carbon inertia provision to reach Northern Ireland's 2030 decarbonisation targets is beyond doubt. The objective should be to ensure the system can operate with 100% low carbon system services by 2030 thus avoiding the need as much as possible to constrain on conventional plant for system services provision.

We note that Role 4 would also be responsible for connections related activities, including offshore. However, there are no deliverables or actions relating to offshore included in the overview or Appendix 4. In light of the target of 1GW of offshore connecting from 2030, it is vital that offshore connection policy is in place in preparation for this. Furthermore, a clear process for connecting offshore renewables will be required in order to facilitate the 500MW of offshore connecting by 2030 in the Accelerated Ambition scenario.³ We would also reflect on progress made in the implementation of offshore in ROI and note that a lot of work and time has been required to ensure that all appropriate measures are in place. With this in mind, it is important that SONI starts to work on this now to ensure that the necessary steps are completed in good time for NI.

Conclusion

RNI commends SONI's commitment to facilitating increased renewable electricity generation onto the grid. Increased investment and improved planning timelines will be needed to achieve our renewable energy targets and ultimately our decarbonization ambitions. The importance of developing the necessary policy and reinforcements to meet NI's renewable energy targets are

³ SONI, Tomorrow's Energy Scenarios Northern Ireland 2020. Available at: [TESNI-2020.pdf \(soni.ltd.uk\)](https://www.soni.ltd.uk/tesni-2020.pdf)



more urgent than ever, and we appreciate every effort made by SONI that supports the achievement of 80% RES-E by 2030.

We look forward to working with SONI and other partners, including the Utility Regulator and NIE Networks, to ensure that the development of the grid continues to be world leading.

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