

SONI Evaluative Performance Framework

Evaluation Report to UR of the EPF Expert Panel

Assessment of SONI Forward Work Plan

1 October 2023 to 30 September 2024

Preamble

Throughout this report, the following abbreviations are used:

UR is the Utility Regulator in Northern Ireland

EPF stands for Evaluative Performance Framework

SONI is the electricity transmission System Operator for Northern Ireland

TSO stands for Transmission System Operator

DSO stands for Distribution System Operator

NIEN stands for Northern Ireland Electricity Networks

SEMC stands for Single Electricity Market Committee

Introduction

As part of the 2020 to 2025 SONI price control, UR introduced the EPF, the primary purpose of which is to provide financial and reputational incentives to SONI to encourage it to engage in actions and behaviours which contribute to four high level outcomes.

One element of the EPF is the Expert Panel, established to bring independent expertise to the assessment of SONI's planned and actual performance.

The Panel's function is to undertake an evaluation of, and report on, SONI's Forward Work Plan (the Plan) and, subsequently, SONI's performance against this Plan.

The Panel's instructions are to assess the material in the Plan, and to take into account submissions provided by SONI's stakeholders in making its report to UR.

UR has provided detailed guidance* to support and guide the Panel in its work.

UR is the decision-making authority.

This cycle of the EPF process relates to the regulatory period 1 October 2023 to 30 September 2024.

*<https://www.uregni.gov.uk/publications/evaluative-performance-framework-guidance-document>

Panel Assessment Process

Review of Forward Work Plan

The Panel followed the detailed guidance issued by UR in reviewing and evaluating the Forward Work Plan.

This involved applying the following criteria:

- Service Ambition
- UR Service Priority Alignment
- Stakeholder Engagement
- Service Accountability

to the assessment of the actions and behaviours that the Plan presents as contributing to four high-level Outcomes:

- Decarbonisation
- Grid security
- System-wide costs
- SONI service quality

in each of the four SONI roles:

- System Operation and Adequacy
- Independent Expert
- System Planning
- Commercial Interface.

Review of Submissions from the UR and other stakeholders on the Plan

Written submissions on the Plan were solicited by UR during a consultation period which concluded on 14 November 2023, and these were considered by the Panel.

Participation in meetings with stakeholders on the Plan

The Panel participated in a Stakeholder Meeting, attended by stakeholders/stakeholder representative groups, held (in person and virtually) on 23 November 2023.

During the first (open) part of this meeting, SONI made a presentation and stakeholders were then invited to make comments and ask questions of SONI. In the second (closed) part, attended by SONI, UR and the Panel, the Panel asked questions based on the Plan and information arising from the earlier session, and SONI provided responses.

Review of Forward Work Plan

General Panel Commentary on Forward Work Plan

This is the third Forward Work Plan submitted under the EPF.

The Panel found the Plan to be generally easier to read compared with previous years, with good use of diagrams throughout; in particular, there was good diagrammatic linkage of deliverables to roles.

The Plan's structure has evolved somewhat to reflect feedback from UR, the Panel and other stakeholders, as well as attempting to highlight how SONI's strategy and goals are addressed by actions under the four roles prescribed by UR for this process.

Given that the EPF focusses on differentiating "business as usual" activities from those which go beyond, the Panel considers that SONI might, in future Plans, give consideration to a short section highlighting development and innovation initiatives throughout the activities and across the four key roles. (These are identifiable at present in the individual sections; however, highlighting them would allow SONI to further communicate its efforts in these areas to stakeholders.)

In general, a satisfactory level of programme and project detail has been given throughout the Plan. No explanation of project discontinuity from previous Plans was given. Some known projects (e.g. EPF Annual Performance Report) were not listed.

There was a much stronger emphasis on stakeholder engagement throughout the document compared to previous years; further work on suitable metrics remains to be done.

SONI has introduced a Cost Scale Indicator in response to the Panel's comments on previous Plans. This is useful for the Panel's work.

The subject of collaboration was referred to in the Panel's last report. Given the FWP's emphasis on engagement with stakeholders, more detail of planned collaboration in the execution of activities was anticipated than was presented in this Plan. It would also be helpful to have some examples of where collaboration has led to improved outcomes.

Key Performance Indicators (KPIs) assist evaluation of evidence by the Panel and stakeholders, as well as being sensible control tools for SONI. Appendix 5 provides detail on SONI's Key Performance Indicators. It provides some information on why the various measures are thought to be useful in contributing to the four Outcomes, as well as giving a historical picture of the trends in the quantitative measures. There was some inconsistent treatment of KPIs throughout the Plan. For example, the Panel considers that the exclusion of RES-E was made without consideration of stakeholder views to the same extent as that for a similar decision on TNPP Submissions. Stakeholder comments in the written submissions and at the

Stakeholder Meeting showed concerns that the range of KPIs at present is too limited and does not address the full picture. The Panel recommends that SONI reconsiders the range of KPIs in future Plans to ensure that the metrics employed fully measure performance across all Roles and Criteria.

The presentation of information on deliverables was generally well presented. Appendix 5 Page 5 states “The deliverables set out in our Forward Plan 2023-24 are ambitious”. It would be helpful to have further explanation in this Appendix as to why SONI considers this to be the case. Although historical data is provided, a statement of why the target is challenging would help clarify the position.

“System-wide” or “whole system” issues are mentioned at various points in the FWP. This area featured in feedback on previous Plans. However, it is not always clear what is meant by “system-wide” and whether or not it always related to electricity systems or wider energy systems. Even within electricity-only considerations relating to system services, there was little evidence of significant engagement with the DSO in this area. In general, this issue has a bearing on the nature of collaboration expected of SONI, and also the range of stakeholders involved. Evidence of significant engagement, or planned engagement, with gas TSOs on whole energy systems planning was expected but not found in the Plan.

Evidence of planned necessary facilitative work on some areas of technical innovation, such as Long Duration Energy Storage, was expected and was found in the Plan.

It is stated in the Plan that “SONI has not detailed any programmes of work associated with cyber security. SONI considers cyber security as a confidential area and therefore does not intend to include a narrative or metrics in the Forward Work Plan.” In the Panel’s Evaluation Report of its assessment of SONI’s previous FWP, observations on the importance of Cyber Security were made, along with a recommendation that the Panel and UR be given some means of knowing that “this area has been receiving, is receiving and will continue to receive proper attention by SONI and appropriate scrutiny by deemed relevant authority”. Such assurance has been sought and received by UR and the Panel.

Early in the Plan, reference is made to work that SONI is undertaking to implement recent licence requirements relating to SONI Governance. It is stated that “no detail on the SONI Governance programme has been included in this forward work plan.” The Panel understands that matters relating to Governance are outside the scope of the EPF. However, as with Cyber Security, the Panel considers that there is the theoretical potential for changes in this area to impact on performance in the future. The Panel therefore recommends that, when the revised arrangements are properly established and fully functional, it would be useful for SONI to identify in EPF documents what (if any) positive or negative impacts such arrangements could have on matters which are of rightful concern to stakeholders.

Criterion 1- Service Ambition (all Roles)

The addition of the Cost Scale in this Plan is helpful in identifying the relative importance of the various projects and their contribution to the desired outcomes. In addition, the explanatory text in each of Appendices 1-4 provides some thinking about why the projects are necessary and how they will contribute to the four outcomes. Greater clarity on which of these projects are particularly innovative and which contribute to longer term strategies could usefully be identified more clearly.

Criterion 2- UR Service Priority Alignment (all Roles)

The UR Strategic and Service priorities are set out in Annex 2 of the EPF guidance and are largely focussed on a culture of innovation, organisational learning and holistic collaboration across the sector, for example in the field of digitalisation.

As in previous years, much of the evidence provided by SONI across the various roles relates to collaboration and learning within and across SONI itself and with the Regulator and NIEN. There are some references to learning and collaboration with others. This could usefully be expanded to include examples of where SONI has learned from other organisations. The need for wider collaboration, for example with the gas sector, was raised by participants at the Stakeholder Meeting.

Criterion 3 – Stakeholder Engagement (all Roles)

Stakeholder engagement is a core theme of the EPF, runs through all roles and is important for the successful achievement of the four Outcomes. It is specifically an integral part of addressing the UR Service Priorities (Role 2). Section 4 of the Plan provides an overview of the broad range of stakeholders with which SONI plans to engage intensively and focuses on planned engagements across the four Roles.

Appendix 6 Page 4 states that SONI has undertaken a comprehensive Stakeholder Needs Assessment which has informed the engagements planned for the year and which will inform the new Stakeholder Management Strategy. While this is a welcome step forward, there is still much more to do in detailing how stakeholder feedback will affect what SONI does within each Role. In particular, a measure (quantitative or qualitative) of stakeholder satisfaction will provide evidence of progress, particularly in relation to Criterion 4- Service Accountability. It will also be necessary, as part of the end year performance review process (which has not yet been undertaken for any FWP to date) to have a measure of performance in the area of stakeholder satisfaction. Thus, in the FWP 2023-24, there is a continuing reliance on timely production of publications or (timely) delivery of a product as a stakeholder satisfaction performance measure throughout the Plan. While this represents one type of quantitative measure, SONI would benefit from having the work on

stakeholder engagement completed so that there is a better measure of quality (as seen by stakeholders), and any positive results from stakeholder engagement could be articulated. Appendix 5 Page 17 suggests that SONI will develop evaluation frameworks “mixing qualitative and quantitative measures to establish the most accurate picture possible”. Appendix 6 Page 6 states that “the evaluation framework will set out a proportionate and meaningful approach to monitoring and assessing our success in delivering against our commitments”. This is to be welcomed and the completion of this work should help SONI in assessing and acting on stakeholder views. The SONI presentation on stakeholder engagement at the Stakeholder Meeting indicated that work is being done in this area.

As in previous years, the plan describes the engagements which will take place. The table showing the various fora and planned engagement is much more detailed than in previous years and better focussed on the different types of engagement with various segments of stakeholder. The stakeholder list has also been expanded considerably to include the wider industry and community sectors such as the NI Chamber of Commerce, the Institute of Directors and the Ulster Farmers’ Union (although not the gas industry). A further improvement is the planned programme of participatory research with local communities to inform revisions to SONI’s public engagement strategy. (Appendix 6 Page 10)

There is limited detail on how SONI has incorporated feedback from stakeholders. Examples of where it is detailed include the improvements to the FWP 2023-24, having taken account of feedback from previous years, and on specific projects where landowners’ and community views have been considered. Appendix 6 Page 7 also indicates that SONI has taken account of stakeholder views on prioritisation. Appendix 6 Page 6 indicates that SONI plans to improve its engagement on the NI Energy Strategy as work intensifies.

Feedback from stakeholders indicates a welcome for the stated improved engagement but a desire to further improve engagement and collaboration with key stakeholders. The Panel has previously stated that engagement with all energy providers, including the gas sector, “is necessary to bring about wider collaboration and innovation across the energy sector in order to address the longer term requirements of the Climate Change Act”.

Criterion 4- Service Accountability (all Roles)

Until the stakeholder measure has been developed, SONI’s performance in service accountability will remain difficult to demonstrate. Other measures described are delivery of the relevant milestone, but in some cases this is either outside SONI’s control or is qualified by the need for approval of funding or input from others.

Roles – General Comments

One improvement in presentation over previous Plans can be seen in clearer linkages between the Roles, Deliverables and the SONI Outcomes. Section 5 of the Plan provides a description of the four Roles and sets out the key activities which fall under each Role. Within Sections 6-9 and Appendices 1-4, the key Deliverables are linked to the four SONI Outcomes.

Role 1 – System Operation and Adequacy

Section 6 of the Plan sets out the key areas of focus for this role – operational and market related activities including scheduling and dispatch, future arrangements system services (FASS), emergency preparedness, contributing to security of supply and facilitating renewable generation in the context of the NI Energy Strategy.

Role 1 - Key Performance Indicators

The measurable key performance indicators for Role 1 are listed on Page 15 of the Plan as: SNSP, Renewable Dispatch Down, Imperfections Costs and System Frequency. The table on Page 22 lists the targets for these as well as the 2019 baseline, with some additional commentary and further detail in Appendix 5. Some contextual information is provided in the commentary which goes some way to explaining why the targets are considered challenging (e.g. Plan Page 22 – all island Minimum Number of Conventional Units constraint change from 8 to 7).

For Imperfections Costs, the target is to be determined Annually Ex-post. Until a full year performance cycle has been completed, this remains a measure rather than a target. For System Frequency, the target is approximately the same as the baseline, although some contextual information describes how this is a “maintenance of requirement” position. For Renewable Dispatch Down there is no indication as to why 10% is considered stretching.

Some KPIs, that were included in previous Plans, have now been removed following stakeholder feedback.

Role 1 - Deliverables

Section 6 of the Plan provides detail on the nine projects which contribute to this role. Page 17 of the Plan states that projects under the FAAS heading and the Scheduling and Dispatch programme have significant dependence on SEMC decisions and any delay in such a decision could have implications for delivering the plans as set out. In advance of the Stakeholder Meeting SONI said that this decision

has now been delayed from September to December 2023 – this may impact on delivery of the objectives in the plan. Lack of updated information on programme progress from the previous Plan made it difficult to determine evidence for evaluation.

Role 1 - Contribution to Outcomes

Decarbonisation – Work on FASS and Scheduling and Dispatch will support the integration of new technologies and assist in the delivery of RES-E 80% by 2030. It will ensure that SONI is on the path to enable requirements in the Clean Energy Package.

Grid Security – IT systems update and control centre tools and capacity auctions will support improving Grid Security, e.g. FWP004 and new project FWP24-01- the Introduction of NRAA (National Resource Adequacy Assessment). This is particularly important in the context of an environment which is complex and challenging due to the amount of electricity being produced from non- synchronous weather dependent sources. In order to undertake work under NRAA, collaboration with gas TSOs will be required; this is not explicit in the Plan.

System Wide Costs – FASS, Scheduling and Dispatch projects work designed to minimise costs and increase competition between providers. Part of a multi-year approach.

SONI Service Quality – stakeholder engagement on the activities planned under this role will continue.

Role 1, Criterion 1 – Service Ambition

Many of the projects described can be seen as stretching from a strategic point of view, and the links to the longer term outcomes of Decarbonisation and Grid Security are well spelled out in Appendix 1. However, some of the project milestones are qualified by the need for a SEMC decision (FWP23-01) or for funding approval (FWP23-02)– thus they are not directly within SONI’s control. FWP004 (Capacity Auctions), while high cost, appears to be a routine activity which must be carried out (albeit it involves engagement with the UR and participants).

Role 1, Criterion 2 – UR Service Priority Alignment

Under Role 1, Appendix 1 describes the contribution of the various projects to the UR desired culture of innovation and cross-organisational learning. With a few exceptions, the organisational learning is described as intra-organisational rather than learning from best practice elsewhere.

In order to achieve a higher score in this criterion, SONI should consider collaboration and organisational learning with a wider lens.

Role 1, Criterion 3 – Stakeholder Engagement

Stakeholder engagement has clearly improved since the previous Plan, and work is on-going to develop a Stakeholder Management Strategy. Appendix 6 page 6 describes improvements made to public and stakeholder engagement in relation to grid infrastructure. This has resulted in “a framework for decision making which puts accessible communities, digitalisation, outreach with communities and stakeholders at the heart of our approach”.

While stakeholder engagement has improved since last year, the Panel considers that further, measurable engagement with more stakeholders should occur.

Role 1, Criterion 4 – Service Accountability

Service accountability will continue to be difficult to assess until the stakeholder measures have been developed. At present, under the FASS project, FWP23-01, performance is to be measured by successful progression of the deliverables - the text on page 11 indicates that the timescale is dependent on timely decisions and funding approvals by the UR. Within FWP23-02, the success measure is delivery of the various phases, but the timing is dependent on regulatory funding approval.

Role 2 – Independent Expert

Section 7 of the Plan provides an overview of SONI's role as Independent Expert, covering their engagement activities and the provision of an expert voice for stakeholders as well as activities such as the Annual Innovation Report, preparations for the next SONI Price Control and a Stakeholder Management Strategy.

Role 2 - Key Performance Indicators

The KPIs listed under Role 2 on Page 15 are: timely delivery of publications/material; achievement of the set of deliverables, and quality and quantity of Feedback. This is similar to the previous Plan. Work has been undertaken in relation to the development of a Stakeholder Management Strategy. Until this work is complete, it will be difficult for SONI to measure improvements in stakeholder engagement. In relation to the measure “Timely Delivery of Publications”, this does not include any measure of the quality of the publication. When the Stakeholder measure is developed, there may be scope to measure the quality of publications rather than only the timeliness.

Role 2 - Deliverables

Page 23 and Table 4, pages 24-26 provide a list of the eleven projects contributing to this role. Of these eleven projects, FWP24-03 and FWP24-04 relate to stakeholder engagement improvements, while FWP23-15, FWP022 and FWP24-05 can be regarded as normal annual operational activities which SONI is required to do.

On Page 9 of the Plan, SONI describes its contribution to the NI Energy Strategy, including a primary goal of “leading the Northern Ireland electricity sector on sustainability and decarbonisation”. As in the previous Plan, it is stated that SONI “can influence all of the threads of the NI Energy Strategy” but has specific roles in delivery of two of the key principles: Replace Fossil Fuels with Renewable Energy and Create a Flexible, Resilient and Integrated Energy System. Additional project activities this year cover strategic engagement on Offshore Energy and work on Tomorrows Energy Scenarios Northern Ireland (TESNI).

Role 2 - Contribution to Outcomes

Decarbonisation – through contribution to the NI Energy Strategy and the publication of Tomorrow’s Energy Scenarios NI, SONI will assist with NI’s clean energy transition.

Grid Security – through TESNI 2023 and Security of Supply Publications.

System Wide Costs –. SONI has an aim of creating customer savings as a result of these projects” (Innovation Report and stakeholder views of suggested projects), but it is not explained how.

SONI Service Quality- through Stakeholder Management Strategy and an Enhanced Public Engagement Process for Network Infrastructure.

Role 2, Criterion 1 – Service Ambition

Some of the projects described within this role can be viewed as business as usual (e.g. the production of the mid-year performance report and the FWP for 2024/25). Differences described this year for the other projects describe expectations of a greater level of engagement with stakeholders than previously, although the work on the Stakeholder Management Strategy has not yet been completed.

Role 2, Criterion 2 – UR Service Priority Alignment

Although the document states that SONI's aim is for a culture of open and collaborative innovation and effective engagement and organisational learning, much of the engagement described within the projects relates to internal discussions within SONI.

Role 2, Criterion 3 – Stakeholder Engagement

While work is underway to develop a Stakeholder Management Strategy, and some wider engagement with stakeholders is planned, this cannot yet be assessed as evidence of exceeding expectations.

Role 2, Criterion 4 – Service Accountability

This criterion largely relates to openness and transparency about measuring what has been achieved. Many measures still relate to timely delivery or, in some cases, successful delivery of the objectives. Once a stakeholder satisfaction measure has been developed, this should lead to improvements in assessed performance in this area.

Role 3 – System Planning

Section 8 of the Plan provides an overview of how SONI works with NIEN on the Grid Development Process.

Role 3 - Key Performance Indicators

The KPIs for Role 3 set out on Page 15 of the Plan are: achievement of the set of deliverables, and quality and quantity of stakeholder engagement. It is noteworthy that SONI has taken account of feedback on the previous Plan and has removed a KPI (number of TNPP submissions to the UR and timeliness of approval).

Role 3 - Deliverables

Pages 30-33 of the core Plan set out detail of the thirteen projects within this Role. As in the previous Plan, many of the projects are multi-annual, and the performance measures relate to achieving the next step in the process.

Role 3 - Contribution to Outcomes

Decarbonisation – The projects described will facilitate increased access for renewable generation to the Transmission System, e.g. the Mid Antrim Upgrade.

Grid Security – The projects described cover increased interconnection, improving system stability at high levels of renewable generation and grid security at specific places on the transmission system. Energising Belfast and the Moyle export capacity project are cited as examples.

System Wide Costs – A three-part process will identify the most economical solution to each grid requirement.

SONI Service Quality – SONI states that improvements in data and digitalisation will allow for a more targeted stakeholder engagement such as geo-targeting.

Role 3, Criterion 1 – Service Ambition

There are a number of projects within this role designed to improve grid security. Most are described as enhancements, extensions or replacements of existing infrastructure. Given the number of projects and the need to progress all of them to achieve the four outcomes, this portfolio of projects can be considered challenging.

Role 3, Criterion 2 – UR Service Priority Alignment

As for the other roles, more work is needed on collaboration, innovation and learning across the whole energy sector rather than with only UR and NIEN. This year, engagement with Mutual Energy is described in some of the projects, although at the stakeholder meeting, the Mutual Energy representative said that more work on collaboration was needed.

Role 3, Criterion 3 – Stakeholder Engagement

As for other roles, stakeholder engagement is moving in a positive direction but could not yet be described as exceeding expectations.

Role 3, Criterion 4 – Service Accountability

The performance measures relate to delivery of the projects. More work is needed to show that SONI is open and transparent in measuring its performance and satisfying stakeholders.

Role 4 – Commercial Interface

Section 9 of the Plan provides an overview of two categories of activities under this Role – Connection and Access Rights; and Contractual Interface.

Role 4 - Key Performance Indicators

Within this role, the KPIs as set out on page 15 of the Plan are: achievement of the set of deliverables and quality and quantity of stakeholder feedback.

Role 4 - Deliverables

Table 8 on Page 37 of the Plan describes the four projects contributing to this Role. Two of these (FW23-27 and FWP23-28) could be considered to be “business as usual” in terms of progressing new connection agreements and applications (assuming no change to methodology), although the scale and number of connections may be different from previous years. FWP001 is “Very High” on the cost scale and is moving to tender outcome during the year. The work under FWP24-06 on Long Duration Energy Storage at “Medium” cost is clearly innovative. The Plan did not explain how or why this latter project was selected; stakeholder feedback discussed alternative potential solutions to a not-articulated problem.

Role 4 - Contribution to Outcomes

Decarbonisation and Grid Security – FWP001 and FWP24-06 are key projects in facilitating the new technologies required for decarbonisation and grid security.

System Wide Costs – The system wide improvements described are expected to lead to longer term reductions in costs.

SONI Service Quality – The delivery of improved service quality is to be achieved by open and transparent communication with stakeholders.

Role 4, Criterion 1 – Service Ambition

The projects listed are expected to improve the connection and contractual processes and help address the requirements of the Climate Change Act. They can be seen as meeting but not exceeding expectations.

Role 4, Criterion 2 – UR Service Priority Alignment

As stated in previous Panel reports, evidence of wider cross-sectoral collaboration and learning than given in the Plan would have resulted in more favourable evaluation in this area.

Role 4, Criterion 3 – Stakeholder Engagement

The Stakeholder Management Strategy, when developed, should improve stakeholder engagement. Comments on the plan from stakeholders have suggested that a complete energy system-wide approach to planning for the future would involve the gas and electricity sectors working together in order to provide better outcomes for all.

Role 4, Criterion 4 – Service Accountability

The completion of work on appropriate stakeholder satisfaction performance measures will result in improved Plan evaluation on this criterion.

Grading of the Forward Work Plan

In the EPF Guidance, UR provided the Panel with a mechanistic methodology for arriving at an overall assessment grade. This involves attributing a score for how each criterion was met in each of the four SONI roles, arriving at an aggregate, weighted score across the criteria, then a corresponding grade for each role, and ultimately a weighted-average overall assessment grade for the Plan.

Each Panel member separately undertook the assessment in advance of the meeting of the Panel on 23 November 2023. In that meeting, the Panel reviewed evidence submitted by stakeholders, revisited individual scoring where appropriate, agreed a consensus score for each criterion, and thus agreed grades for each role and an overall assessment grade for the Plan.

The results of this process are given in the following Table.

		Role 1 System Operation and Adequacy	Role 2 Independent Expert	Role 3 System Planning	Role 4 Commercial Interface
Weights		27.5	25	25	22.5
Criterion	Criterion	Score	Score	Score	Score
1	Service Ambition	1	1	1	0
2	UR Service Priority Alignment	0	0	0	0
3	Stakeholder Engagement	0	0	0	0
4	Service Accountability	-1	-1	-1	-1
Assessment Total	(Criterion 1 score x2)	1	1	1	-1
Assessment	Grade	4	4	4	2
	Overall Grade	3.55			

[The scores run from -1 to +1, and the grades run from 1 (poor) to 5 (excellent). Grade 3 is "baseline".]

The Plan is therefore deemed (using the language in the UR guidance to the Panel) to:

- exceed expectations with respect to the Service Ambition criterion
- meet expectations with respect to the UR Service Priority Alignment criterion
- meet expectations with respect to the Stakeholder Engagement criterion
- fall short of expectations with respect to the Service Accountability criterion

The Plan is rated “good” (according to the UR grading guidance) for Role 1, System Operation and Adequacy, Role 2, Independent Expert and Role 3, System Planning.

The Plan is rated “lagging” for Role 4, Commercial Interface.

The Panel assessed overall grade for the Forward Work Plan is 3.55, which is deemed between “baseline” and “good”.

The Panel notes that this is a marginal improvement on the assessed grade for the previous Forward Work Plan.

The Panel considers that the Plan demonstrates a positive approach to the EPF process, and continued progress year-on-year in the level of ambition shown and the initiatives which are being developed/brought forward.

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