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Ref: K'ON/128/025-B

21 April 2023

Market Monitoring Unit

Utility Regulator

Queens House

14 Queens Street

Belfast

BT1 6ED

By email to: [marketqueries@uregni.gov.uk](mailto:marketqueries@uregni.gov.uk)

Dear Market Monitoring Unit,

**Re: Consultation on revising the UR Enforcement Policy Approach and Procedure**

SONI is the Transmission System Operator for Northern Ireland and, together with EirGrid, operator of the Single Electricity Market and its associated Capacity Market. We have reviewed your proposed update to your Enforcement Policy Approach and Procedure.

We agree with your proposal to remove paragraph 1.7 which states the “procedure does not apply in respect of matters or decisions that are within the jurisdiction of the SEM Committee in relation to the all-Ireland Single Electricity Market. We strongly welcome the inclusion of SEM related activities within the scope of the enforcement Policy Approach and Procedure.

We will obviously support the UR with any investigations into bidding behaviour in any of the markets that we operate that are facilitated by the update to the procedure.

Other points of note are:

- At paragraph 1.6 a flowchart is referenced and is stated to be included at appendix 1. There is no appendix 1 in the document.
- The numbering of the Procedures has not been updated correctly in the event that Paragraph 1.7 is removed.

Yours sincerely,

*[sent by email and accordingly bears no signature]*

**Kevin O'Neill**

Head of Regulation and Commercial, SONI Ltd.