



Clodagh Goodman
Utility Regulator
Queens House
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Via email: clodagh.goodman@uregni.gov.uk

30 January 2024

Dear Clodagh

**RE: CONSUMER COUNCIL RESPONSE TO THE SONI EVALUATIVE PERFORMANCE FRAMEWORK:
ANNUAL PERFORMANCE REPORT 2022/2023 – CALL FOR FEEDBACK.**

Thank you for the opportunity to provide feedback on the “SONI Evaluative Performance Framework: Annual Performance Report 2022/2023 – Call for Feedback”.

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.

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

The Consumer Council welcome the opportunity to respond to the Call for Feedback so that our views and that of the other stakeholders, can provide evidence and help build a comprehensive picture that the independent panel of experts can consider, when they are reviewing SONI’s Annual Performance Report for 2022/2023.

In our assessment of how SONI has delivered these against Key Performance Indicators (KPI’s) through their Forward Work Plan 2022-23, we have outlined our feedback below, based on the four SONI TSO Outcomes:

- Decarbonisation
- Grid Security
- System Wide Costs and
- SONI Service Quality

1. Decarbonisation

It is welcome that SONI has progressed projects that support government decarbonisation policy and met its targets relating to system non-synchronous penetration and renewable dispatch down. It is essential that these targets continue to be set in a manner that facilitates achievement of the requirements of the Climate Change Act (Northern Ireland) 2022 and that the related system planning is optimised to minimise cost to the end user.

There was no RES-E percentage target set in the Report, or actual percentage given to indicate the level of electricity from renewable sources in Northern Ireland. It is unclear from the report why this is the case. This lack of transparency does not assist non-experts who may be trying to understand the sector and the performance of SONI.

2. Grid security

Grid security is of vital importance to consumers, stakeholders, and future generations. Ensuring grid security is likely to become more challenging as more renewable generation is adopted to achieve the 2030 and 2050 net zero targets. It is therefore essential that SONI appropriately manage the balance between security of supply and system-wide costs.

3. System-wide costs

System wide costs are mainly influenced by the makeup of the assets on the system. How those assets are planned and used in an optimal way is critical to end users. It is therefore notable that SONI only reports against one Performance Indicator relating to system-wide costs in its Annual Performance Plan. While we recognise the hugely important role of the Utility Regulator in scrutinising SONI's spending and performance, we suggest it would be valuable to end users if SONI's performance in optimising costs in system planning, was reported on, in a more comprehensive and relatable manner.

4. SONI service quality

There are a lack of stakeholder and consumer insights contained within the Report. This suggests that SONI can still do more to use stakeholder research to inform business planning and set performance commitments. The report demonstrates there has been an improvement in levels of stakeholder engagement and satisfaction, but the baseline satisfaction metric (figure 21) demonstrates there is more to be done to increase satisfaction levels. This is exceptionally important given the key roles SONI holds in system planning and as an independent expert which are becoming ever more important as we strive to meet Northern Ireland's ambitious net zero targets.

It is imperative that UR place significant weight on stakeholder/customer/consumer feedback and stakeholder/customer/consumer-facing output measures to ensure that SONI is incentivised to deliver outputs that stakeholders value. The UR must continue to make sure SONI is accountable to end users for its performance and robustly monitor SONI's performance.

Moreover, an independent expert must be attuned to the needs of the stakeholders it engages with. SONI should continue to focus on developing its organisational capability to explain the complex decisions their role necessitates in a clear, concise, and understandable way to

stakeholders, particularly representatives of domestic end users, who do not have detailed technical knowledge of the energy sector.

The success of the Energy Strategy for NI will depend upon consumers changing their behaviour and SONI has a key role to play in encouraging active consumer participation. The Consumer Council encourages SONI to continue to engage with its sectoral partners as we collectively work to widen and deepen dialogue and direct engagement with consumers, to keep consumers informed of sectoral plans and progress.

The Consumer Council would like to reaffirm our commitment to collaboration with the UR, SONI and other key stakeholders so that the SONI Price Control 2020-2025 works in the best interest of Northern Ireland consumers.

Yours sincerely,



Raymond Gormley
Head of Energy Policy