Utility Regulator www.uregni.gov.uk

Eimear Watson SONI Ltd Castlereagh House 12 Manse Road Belfast BT6 9RT

Date: 15 April 2025 Ref: NET/E/JF/1215

Dear Eimear

Request for Authority's¹ consent to Extend the Connection Offer Timelines for the Ballylumford Battery Project (MEC 100MW and MIC 100MW)

Thank you for your letter of 7 April 2025 ("the Letter").

We treat the Letter as an application ("**the Application**") - made under Condition 25(5) of SONI's Transmission Licence ("**the Licence**") - seeking the Authority's consent for the extension of the period for the making of an offer by SONI to a **Connection Applicant**, for the connection of a Battery Storage Project (100MW MEC and 100MW MIC), to the Northern Ireland Transmission System.

We start by setting out the relevant terms of Condition 25 of the Licence. We then move to the Application:

1. Condition 25 of the Licence.

Condition 25(5) provides, so far as relevant, as follows (our underlining added):

"[SONI] shall offer terms for [connection agreements] . . . <u>as soon as practicable</u> and (<u>save where</u> <u>the Authority consents to a longer period</u>, which <u>consent may be given on the application of</u> [SONI] following consultation by [SONI] with the person making the application and such other persons as [SONI] considers may be affected or interested) in any event not more than the <u>period specified in paragraph 7</u> after receipt by [SONI] of an application containing all such

¹ In this letter "we", "UR" "us", and "the Authority" are used interchangeably to refer to the Northern Ireland Authority for Utility Regulation.

information as [SONI] may reasonably require for the purpose of formulating the terms of the offer . . ."

Condition 25(7) provides that the "*period specified*" in this case is three months, unless the Authority has consented to a longer period.

2. Background

The application (by the Connection Applicant) for the connection of the Battery Storage Project, was deemed effective by SONI on 17 January 2025, with SONI then having until 17 April 2025 to make a Connection Offer.

SONI details in the application that a Construction Offer, under Condition 20 of the NIE Networks Transmission Licence, was due by 3 April 2025. However, on this date, NIE Networks informed SONI that issue of this Construction Offer would be delayed by one week, to allow more time for discussions concerning considerations required for the Construction Offer relating to a contract not being in place for 110KV GIS switchboards, and the impact of this on timings and costings.

SONI has identified that the proposed delay of one week in the issue of the Construction Offer has had a *"consequential knock on impact,"* to the issue of a Connection Offer by 17 April 2025.

3. The Application

SONI is applying for an extension of the Condition 25 period for the making of the Connection Offer from 17 April 2025 to **9 May 2025**.

SONI acknowledges that the proposed extension of three weeks is longer than the one week delay of the delivery of the Construction Offer, and breaks this down as including:

- The aforementioned one week delay in NIE Networks issuing the Construction Offer to SONI.
- Due to this new timing, work to develop SONI's Connection Offer would fall over the Easter Holiday period, meaning *"there will be an impact on the availability of both key internal and external personnel"* who would feed into the development of the Connection Offer.

• This impacts "other existing SONI work plans that had factored in that the Construction Offer would have been issued on 3 April 2025. The majority of these cannot be moved due to other deadlines."

SONI has concluded that there are no alternative actions that would allow it to issue the Connection Offer by 17 April 2025, with the absence of the Construction Offer from NIE Networks. SONI states that if the Authority does not approve this application, then SONI would not be able to issue the Connection Offer by 17 April 2025, and would likely have to refuse to make the Connection Offer, rather than be non-compliant with Condition 25 (5) of the Licence.

4. The Application Consultation

An application by SONI under Condition 25(5) requires SONI to consult with "...the person making the application for connection, and such other persons as [SONI] considers may be affected or interested."

SONI has consulted with the Connection Applicant and NIE Networks.

Consultation with the Connection Applicant

SONI consulted the Connection Applicant on 4 April 2025. On 7 April 2025, the Connection Applicant replied, commenting that:

"[The Connection Applicant] accepts SONI's Connection Offer extension request from 17 April 2025 to on or before 9 May 2025."

SONI consulted with NIE Networks on 4 April 2025. On 7 April 2025, NIE Networks replied to the consultation, commenting that *"We are in support of this extension."*

5. Our Decision on the SONI Application

We judge the Application against: (i) our principal objective and general duties set out in Article 12 of the Energy (NI) Order 2003; and (ii) the published Decision Paper Guidance². We consider the Application to have been made in accordance with the Decision Paper Guidance.

² <u>Electricity Connections Decision FINAL.pdf (uregni.gov.uk)</u>.

Our decision is to:

- (i) accede to the Application considering it properly founded; and (accordingly)
- (ii) give consent to an extension to **9 May 2025** for the purposes of Condition 25(5) as regards the Connection Application made by the Connection Applicant for the connection of the Ballylumford Battery Project.

In making this decision we have had proper and full regard to the consultation responses from the Connection Applicant and NIE Networks. We note that the Connection Applicant and NIE Networks have supported the application.

The Authority is satisfied that we should grant the Application based on the reasons set out in the Application.

However, we should remind SONI that the grant of consent (for an extension of time) relayed in this letter does not absolve SONI of its Condition 25 obligation to make a connection offer to the Connection Applicant *as soon as practicable*. The newly substituted Condition 25 period does not affect that key licence obligation.

This decision shall be published and placed in the Electricity Register.

We trust this is satisfactory. If you have any queries, please contact Jody O'Boyle.

Yours sincerely,

Jillian Ferris Head of Networks