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Karen Shiels & Liz Wilkin Utility Regulator Queens House, 14 Queen Street Belfast, BT1 6ED

20 December 2024

Dear Karen, Liz,

## Re: Consultation on Licence Modification for Provision of Information

This response is on behalf of SONI Ltd. and relates to both Condition 7 in SONI's Transmission System Operator (TSO) Licence and Condition 6 in its Single Electricity Market (SEM) Operator Licence.

SONI is mindful that in 2024 the Department for the Economy (DfE) consulted on the proposed Utility Regulator (Support for Decarbonisation Preparation) Bill, which would place a duty on the Utility Regulator to provide advice relating to decarbonisation to the Department. While this Bill is not yet law, we are not aware of any reason why it will not become effective in time.

SONI is responsible for forecasting and planning the future electricity network in Northern Ireland, as well as managing and developing the all-island wholesale market via SEMO. As such, there are many plausible scenarios whereby, in the function of executing this likely future advisory role to DfE, the Utility Regulator could seek data, forecasts or modelling from SONI.

SONI are very keen to support both UR, DfE and the wider NI Executive in delivering its decarbonisation obligations, and indeed a key part of SONI's corporate strategy is to be a trusted advisor to government on energy matters.

By the nature of the work we do, for some requests under the provision of information conditions in our licences, SONI will have the relevant data or modelling easily at hand from other projects or deliverables, and so will be able to share easily and at negligible cost. We anticipate that reasonable timeframes will be accommodated for any requests and where possible future requests will be communicated ahead of time to allow SONI time to plan accordingly.

Where this pre-existing information is not available or where significant work is required by SONI to gather or prepare the information, data or modelling, we anticipate that the Utility Regulator will allow SONI to recover the costs of providing this information.

SONI is keen to engage with the UR on the expected level of effort, especially in relation to modelling as we would like to ensure we have the necessary resources in place to proactively support the UR and Government in this important work.

Should you have any queries on this response, please do not hesitate to get in touch.

Yours sincerely,