

Northern Ireland  
Authority for Utility  
Regulation

**TSO Obligations  
under RfG, DCC,  
HVDC and SOGL  
Network Codes**

Decision Paper  
03 October 2025

## About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls; Networks and Energy Futures; and Markets and Consumer Protection. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.



## Abstract

In October 2020, the Utility Regulator (UR) consulted on the allocations of obligations placed on the Transmission System Operators of Northern Ireland (Moyle Interconnector Limited (MIL), System Operator for Northern Ireland (SONI) and NIE Networks) by the specific regulations within a number of network codes (RfG, DCC, HVDC and SOGL). This Decision Paper includes the responses received to the consultation, the work that has occurred with each System Operator since the consultation and sets out UR's final decision.

## Audience

This document will be of interest to Transmission System Operators (TSOs) within the all-island market, market participants and other industry and statutory bodies.

## Consumer impact

These changes have no impact on consumer bills.

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## 1. Introduction

1.1 In October 2020, the Utility Regulator (UR) consulted on<sup>1</sup> the allocations of the obligations placed on the Transmission System Operators (TSOs) of Northern Ireland (Moyle Interconnector Limited (MIL), System Operator for Northern Ireland (SONI) and Northern Ireland Electricity Networks (NIE Networks)) by the specific regulations within each of the following network codes:

- Requirement for Generators (RfG<sup>2</sup>),
- Demand Connection Code (DCC<sup>3</sup>),
- High Voltage Direct Current (HVDC<sup>4</sup>)
- System Operations Guideline (SOGL<sup>5</sup>).

As part of the consultation, UR detailed its minded to position in terms of the allocation of roles and responsibilities<sup>6</sup>.

1.2 Comments were invited on the proposals contained within the consultation paper. Three responses were received during the consultation with none being marked confidential. These were from the three current TSOs in NI (SONI, NIE Networks and Mutual Energy (Moyle)).

## 2. Background

2.1 Each of the network codes, RfG, DCC, HVDC and SOGL, place multiple obligations on all TSOs within a member state<sup>7</sup>. However, the regulations have a common provision for circumstances where more than one TSO exists within a member state.

2.2 This allows Member States to provide responsibility to specific TSOs to comply with the code obligations.

2.3 At the request of The Department for the Economy, UR has assessed what obligations should apply to TSOs in Northern Ireland in accordance with

<sup>1</sup> <https://www.uregni.gov.uk/files/uregni/consultations/Consultation%20on%20TSO%20Obligations.pdf>

<sup>2</sup> [https://www.entsoe.eu/network\\_codes/rfg/](https://www.entsoe.eu/network_codes/rfg/)

<sup>3</sup> "COMMISSION REGULATION (EU) 2016/1388 of 17 August 2016 establishing a Network Code on Demand Connection"

<sup>4</sup> "COMMISSION REGULATION (EU) 2016/1447 of 26 August 2016 establishing a network code on requirements for grid connection of high voltage direct current systems and direct current-connected power park modules"

<sup>5</sup> "COMMISSION REGULATION (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation"

<sup>6</sup> <https://www.uregni.gov.uk/news-centre/launch-consultation-tso-network-code-obligations>

<sup>7</sup> European network codes still apply in Northern Ireland primarily because of the preservation of the Single Electricity Market (SEM) on the island of Ireland, which was maintained under the UK-EU Withdrawal Agreement following Brexit.

the clause in each Network Code. The RfG, DCC, HVDC & SOGL clauses for multiple TSOs is set out in further detail in Annexes 1-5.

### 3. Our Approach to Assigning TSO Obligations

- 3.1 As part of their response to UR's consultation, each TSO provided a marked-up version of UR's minded to decision on the TSO obligations, reflecting their views on the responsibilities for each article across the Network Codes. These responses formed the basis of discussions between each of the Transmission System Operators and UR.
- 3.2 From discussions with each TSO, we have concluded that where the Relevant System Operator (RSO) is always going to be the same TSO obligated to comply with an article, that TSO will have a tick. Where the RSO can change depending on the application of the article, Annexes 1-5 will display a tick beside every TSO that could potentially be obligated to comply with that article. It is worth noting a tick for NIE Networks in the TSO obligations paper (Annexes 1-5), will represent NIE Networks being obligated from a TSO perspective. NIE Networks obligations as a Distribution System Operator are not relevant to the obligations within this paper.

### 4. Decision

- 4.1 The assignment of TSO responsibilities is set out in Annexes 1-5, which explicitly details each obligation in the RfG, DCC, HVDC & SOGL and the TSO(s) to whom the proposed responsibility is assigned.

### 5. Future Changes

- 5.1 We consider Annexes 1-5 to be a 'dynamic document' which can potentially be updated or edited in the future. It is possible that a review of these assignments of responsibilities in the future will be needed to ensure that they remain relevant to the overall regulatory framework as set out in each of the Network Codes (RfG, DCC, HVDC & SOGL).
- 5.2 UR will review the assignment of roles and responsibilities under each of the Network Codes as outlined in this decision paper in the following instances:
  - After developments of Methodologies and Terms and Conditions required for implementation of the Network Codes, UR may review the assignment of roles where one or more TSOs provide clear

evidence that the original assessment does not reflect an enduring function for the TSOs and that to fulfil this obligation unnecessary costs would be imposed on the consumer.

- When there is a change in TSO activity. It is the responsibility of the TSO concerned to notify UR of any change in TSO activity. UR may, dependent on evidence provided, determine whether to review TSO assignment of obligations in the event of a change in TSO activity.
- If a new TSO becomes operational. Should a new TSO become operational in the I-SEM, UR may review the assignment of TSO roles and responsibilities under the Network Codes (RfG, DCC, HVDC & SOGL).
- Revisions and amendments to RfG, DCC, HVDC or SOGL Regulations. The UR recognises that the assignment of obligations under the RfG, DCC, HVDV and SOGL regulations for TSOs in Northern Ireland may change over time. Where amendments are made, the TSOs must provide justifications for a review of the assignment of TSO obligations. UR will consider further consultation on any proposed changes to the assignment of TSO obligations as set out in Annexes 1-5 regarding this decision.

### 5.3 Other factors that may cause a change in TSO obligations.

There are other potential factors that may cause a change in responsibility to the Network Code articles that UR is mindful of. Factors such as potential new trading arrangements and potential subsequent legislation that may be published, could cause the need for amendments to the obligations in the future.