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Date: 16 July 2025

Our Ref: NET/E/BM/1280

Dear Eimear,

**Request for Authority's consent to Extend the Connection Offer
Timelines for the Polaris Offshore Wind Array Project (500MW)**

Thank you for your letter received 3 July 2025 (the **Letter**) setting out 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 the Polaris Offshore Wind Array Project (500MW) 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] . . . as soon as practicable and (save where the Authority consents to a longer period, which consent may be given on the application of [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 period specified in paragraph 7 after receipt by

[SONI] of an application containing all such 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 Polaris Offshore Wind Array Project (500MW), was deemed effective by SONI on 7 April 2025, with SONI stating it has until 6 July 2025 to make a Connection Offer.

We note that SONI appears to consider that the Condition 25(7) “date” for the making of a connection offer is 6 July 2025. We understand that SONI has – absent an extension under Condition 25(5) – until 7 July 2025 to make an offer of connection. This is due to the fact that the application by the Connection Applicant was deemed effective, as of 7 April 2025, by SONI. This is reflected in the Application. The Authority would remind SONI that the period specified in Condition 25 (7) (b) is three months, meaning the period for the making of a connection offer is actually slightly longer than SONI has calculated. While noting this error and making clear SONI should utilise the three month period in future calculations, we have proceeded with the 6 July 2025 date used by SONI. Given the content of the extension application and our decision, use of the 7 July 2025 date would make no material difference to our decision, nor the implementation of the granted extension period.

Whilst the Application was submitted to the Authority with the necessary information - as per the Authority’s 2017 Electricity Connections Decision (the Decision Paper Guidance¹) – it was not received in line with the expectations set out in the Decision Paper Guidance.

The Decision Paper Guidance states that the Authority “*would expect to receive a request from the licensee at least two weeks before the end of the three month connection application period.*” The connection application period expires, according to SONI, on 6 July 2025, and therefore

¹ [Electricity Connections Decision FINAL.pdf](#).

the submission date (of the Application) of 3 July 2025 does not fulfil the stated expectations. The Application itself offers no explanation for the departure from the expectations set out in the Guidance. On follow up enquiry from the Authority, SONI commented that *“The need for an extension to the standard offer timeline was known once the application was received,”* SONI also commented that the connection offer is dependent on optioneering for Castlereagh 275 kVA Substation rebuild, and therefore it was necessary to wait for the SONI/NIE Networks Joint Programme Management Office (JPMO) to conclude work to establish an accurate timeline for this optioneering.

3. The Application

SONI is applying for an extension of the Condition 25 period for the making of the Connection Offer from 6 July 2025 to 4 October 2028. SONI has identified that there is not time to identify the Least Cost Technical Assessment (LCTA) option before the end of the Condition 25 period (although has not elaborated on why this was not identified at an earlier stage). One possibility identified by SONI for the LCTA option is connection to Castlereagh 275 kV substation. However, at the present time, *“it is not currently possible to determine whether a 275 kV connection is feasible at this site, and if it is, what the configuration and cost would be,”* because the substation is undergoing optioneering for replacement, and carrying out the LCTA fully will only be possible when this optioneering is complete.

SONI does not comment, although imply, if the Castlereagh option is considered the most likely LCTA option, at this stage. SONI comments in the application that *“Other options for the connection of the project exist through establishing a new 275 kV substation at other locations,”* but do not provide more detail in the application on whether these options could facilitate a shorter extension, than the 39 month extension proposed. In response to follow up enquiry from the Authority, SONI commented that it will be ‘exploring the viability’ of a connection to a new substation in the Hillsborough area, and time to do this is included within the extension timeline. SONI states, *“However, the critical path item for the issuing the connection offer is currently the Castlereagh 275 kV re-build project, as this will also need to be sufficiently advanced to understand the costs and technical aspects of a connection at Castlereagh, if possible, in order to determine the LCTA.”* It appears the Castlereagh 275 kV re-build is the

main focus for progression, and it is unclear if another option would reduce the time required for extension.

Alongside the LCTA work, SONI also says more design work is required to scope the connection assets for Polaris, especially focusing on reactive compensation, meaning there is a “significant likelihood” it will not be possible to determine the connection assets within what SONI defines as the standard statutory 90 day period², for the issuing of connection offers. SONI anticipates an additional three months would be required for this.

Although SONI does not break down the anticipated timeframe for the TNPP in the application, it says that, based on these two factors, plus a 15% risk allowance applied to programme directions in cases where a connection is dependent on the outcome of a network project (as per HM Treasury Green Book guidance), *“it is expected that the date for the Connection Offer is 4th October 2028.”* In response to a follow up enquiry from the Authority, SONI breaks down the extension period as:

- The TNPP approval scheduled, within the programme for the Polaris connection offer, for November 2027.
- An additional three months scheduled for design of the reactive power compensation for the connection circuits (dependent on the outcome of the LCTA).
- A 15% risk allowance applied to programme duration.

SONI says that it would not be able to issue a connection offer to the connection applicant within statutory guidelines if this extension is not granted, and has concluded that there are no alternative actions that could allow the connection offer to be issued by 6 July 2025 (however without definition of whether other connection options would allow for a shorter extension period).

4. Consultation associated with the Application

An application by SONI under Condition 25(5) requires SONI to consult with *“...the person making the application for connection, and such other*

² As previously in this Decision, we have noted that SONI’s interpretation of the period as 90 days is incorrect, and as per Condition 25, it is in fact three months.

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 sent an email consulting the Connection Applicant on the decision to apply for extension, on 27 June 2025. The Connection Applicant has not yet replied to the request.

On 1 July 2025, SONI consulted NIE Networks (TO) on the decision to apply for extension. On 2 July 2025, NIE Networks replied to the consultation, stating that it is *“in support of this extension.”*

5. The Authority’s decision

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 Guidance.³ We consider the Application to have been made in accordance with the Decision Paper Guidance.

Our decision is to:

- (i) accede to the Application considering it properly founded; and (accordingly)
- (ii) give consent to an extension to 4 October 2028 for the purposes of Condition 25(5) as regards the Connection Application made by the Connection Applicant for the connection of the Polaris Offshore Wind Array Project.

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

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

³ [Electricity Connections Decision FINAL.pdf \(uregni.gov.uk\)](#).

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. SONI should particularly consider if any of the other potential options for connection would allow for the making of a connection offer, earlier than October 2028.

SONI is asked to reflect on our observations (above) as to the expectations explained in the Decision Paper Guidance. We would also ask that the period between the expiry of the Condition 25 period and the granting of this Decision (16 July 2025) is added by SONI to its Compliance Register.

Our expectation is that further applications for Condition 25 type extensions will be presented in accordance with our observations.

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,



Brian Mulhern
Director of Networks and Energy Futures
Duly authorised by the Authority