



Energia Response to Utility Regulator
SONI Evaluative Performance Framework: Annual
Forward Plan 2025/2026 – call for feedback

November 2025

1 Introduction

Energia welcomes the opportunity to respond to the Utility Regulator (UR) with feedback to inform the assessment of The System Operator for Northern Ireland (SONI) against the Evaluative Performance Framework. Energia will attend the in-person event on the 18th of November 2025 and can engage further on any of the points included in this response.

Energia is aware and has had sight of the response submitted by Power NI in response to this assessment of SONI. Further to the comments which are outlined below in this response, Energia expresses support for the points made by Power NI.

2 Dispatch Down

Energia acknowledges and appreciates SONI's meaningful engagement with industry in the implementation and prioritisation of the Dispatch Down Action Plan. Energia supports increased resourcing for SONI to progress this vital work at pace.

Persistently high levels of dispatch down could threaten the momentum of the energy transition in Northern Ireland, levels recently experienced are unsustainable, pose a significant risk to the development of renewable projects and impose substantial costs of compensation to the customer. Measures that can be undertaken in the short-term such as dynamic line rating and special protection schemes are essential to addressing these challenges and reducing dispatch down. SONI should be adequately resourced to facilitate these measures. Other measures such as reducing the number of minimum generation units in NI (alongside an end to existing min-gen derogations) are also crucial.

With regards to SONI's role as System Planner, the persistent delays in transmission upgrades are deeply concerning and incompatible with the scale and urgency of infrastructure development required to support Northern Ireland's energy transition. Without significant grid upgrades, actions taken by SONI to address dispatch down and integrate renewables will only serve to mitigate the current crisis, rather than alleviate the issue on an enduring basis.

While Energia welcomes the formation of the Joint Project Management Office (JPMO) to coordinate the delivery of transmission projects, it must be emphasised that ongoing and continued delays are a significant concern to developers and asset operators in Northern Ireland.

Energia suggests that resources be directed toward the development of a structured process through which market participants and stakeholders can bring forward recommendations to SONI and collaborate on reducing dispatch down. Such engagement would provide an additional avenue to demonstrate proactive and constructive stakeholder involvement on this priority issue

3 Flexibility Needs Assessment and LDES

Energia emphasises the importance of establishing a support mechanism providing a route to market for Long Duration Energy Storage (LDES) in Northern Ireland. This is a critical step in supporting the integration of renewable energy and ensuring the

efficient operation of the grid by minimising dispatch down. Energia believes this should be a priority for SONI.

Energia welcomes the clear project timeline outlined by SONI for the introduction and implementation of the Flexibility Needs Assessment (FNA). SONI's Forward Work Plan states the FNA will form the evidence base for policymakers to develop an LDES support scheme. In the interim, Energia encourages SONI to undertake anticipatory workstreams and engage with industry ahead of time.

Proactive steps such as desktop studies of LDES schemes in other jurisdictions and early engagement to understand industry priorities for LDES in Northern Ireland would help lay a strong foundation. This would enable a support scheme to be implemented as swiftly as possible following the completion of the FNA and subsequent policy direction from the Department for the Economy.

In addition to the work on LDES policy and flexibility, Energia cautions that any further GB-SEM risks exacerbating the issue of dispatch down. Any analysis undertaken by SONI on future interconnection into NI should involve a detailed review of the potential impact on dispatch down.

4 Firm Access Review

Whilst Energia acknowledges the limited scope of SONI's role in the conduct of Firm Access Reviews, in the context of Northern Ireland these studies should be a top priority and an accelerated workstream. Energia welcomes FWP 25-07 and SONI's intention to review and update the Firm Access Quantity methodology. Energia emphasises the importance of delivering on the early 2026 timeline for this workstream. Energia understands that SONI's scope is limited to assessments of the existing policy and believe it would be preferable if they could help the UR with the studies on the impact of the UR's policy options for Firm Access, which is a critical issue for generators.

Firm Access Review is crucial to provide developer certainty, reduce constraint costs and support investment in renewable energy. Energia supports the UR to pursue continued engagement with Regulators on the acceleration of this workstream.

5 Targets

Energia is opposed to the removal of the KPI for dispatch down from the Evaluative Performance Framework. Energia believes this metric should be reinstated, as it directly reflects outcomes that are materially influenced by SONI's operational decisions. It would be reasonable for any such KPI to be re-baselined to reflect changes in interconnector flows since 2023 and to focus specifically on dispatch down levels in Northern Ireland. Energia understand that both EirGrid and ESNB have dispatch down metrics assessed as part of their performance.

Additionally, the 60% stakeholder satisfaction target appears notably low, and the continuation of the 75% SNSP target for 2025/26 is disappointing given the broader ambition of achieving 80%. Energia suggests that a more ambitious approach to both of these targets would better reflect stakeholder expectations and the evolving energy landscape.