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By Email Only: Eimear.Watson@soni.ltd.uk

Date: 10 October 2025

Our Ref: NET/E/JF/1366

Dear Eimear,

Request for Authority's consent to Extend Section S Offer Timelines for an Increased Capacity of 81MW (Via a Second Transformer) at Tremoge Cluster

Thank you for your letter received 29 September 2025 (the **Letter**) setting out an application (**the second 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 a (Section S)¹ Connection Offer to NIE Networks, (as Distribution Network Owner - DNO).

1. Condition 25 of the Licence.

Section S of the Transmission Interface Agreement ('TIA') gives NIE Networks the right to submit an application to SONI to provide any necessary transmission works, when a person has applied to NIE Networks to connect to the Distribution System, and in the view of NIE Networks this may require a Construction Project, were it to proceed. In parallel to the Section S connection offer process, SONI has made a Construction Project application to NIE Networks under Condition 25 (2) of the SONI Transmission System Operator Licence.

¹ Of the Transmission Interface Arrangement (TIA).

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 first application (by NIE Networks), for a Section S Connection Offer, was deemed effective by SONI on 17 April 2025, with SONI stating it had until 16 July 2025 to make a Connection Offer, this was then extended by the Authority² to the 10 October 2025³.

SONI states in the first application that there had been a recent influx of connection applications/Section S applications received, with nine that had been deemed effective in the past four months, and four that were currently live. SONI identified that, due to a lack of capacity on the Transmission System, each of these applications required technically complex work to identify the Least Cost Technically Acceptable (LCTA) connection arrangement. This involved deployment of personnel over multiple areas, including contractual, technical, infrastructure, legal and regulation. Final arrangements would also have had to be signed off in line with SONI’s Delegated Control Framework. SONI applied for extension of the period for the making of the Section S Connection Offer, because of the difficulty in processing the number of those technically complex applications within the statutory timelines. This extension was granted by the Authority.

² In this correspondence we use the words “us” “we” “our” “UR” “Utility Regulator” and “Authority” interchangeably to refer to the Northern Ireland Authority for Utility Regulation.

³ [2025.07.16 SONI C25 Tremoge DL](#)

It is referenced in the second application that the “*connection studies for the Tremoge Cluster additional capacity identified overloads occurring on the Transmission System.*” SONI says this requires investigation into deeper network reinforcement, including identification of a preferred option and any pre-construction approval (including a TNPP, if required), therefore highlighting the need for extension.

3. The Application

SONI originally applied for an extension of the Condition 25 (7) period for the making of the Section S Connection Offer, from 16 July 2025 to 10 October 2025, because of the difficulty in processing the number of technically complex applications at that time, to the level of quality control SONI require, to issue the Connection Offer within the statutory timelines.

The second Application is for an extension from 10 October 2025 to 12 October 2026, to facilitate time for the deeper network reinforcement to manage the identified overloads and lack of transmission system capacity.

SONI comments that, if this application is not granted, then SONI would, not be capable of issuing a connection offer by 10 October 2025, and “*would likely have to refuse to make the Section S Offer under Condition 25 (6) of the Licence,*” as SONI’s initial consideration has concluded that there are no alternative actions that would facilitate a Section S Connection Offer to be issued by 10 October 2025.

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 persons as [SONI] considers may be affected or interested.*”

SONI has identified affected parties as NIE Networks. NIE Networks (as DNO) is the applicant in respect of which the Section S connection request has been made. NIE Networks (as Transmission Owner - TO) is affected or interested, with respect to the Construction Project application and offer process under the TIA.

Consultation with the Connection Applicant

SONI sent an email consulting NIE Networks on the decision to apply for extension, on 29 September 2025. NIE Networks had not responded at the time of the application.

We note that the consultation was sent to NIE Networks just two hours prior to submitting the application to us. The Authority would highlight that this can cause challenges in processing these applications within statutory deadlines. It is recommended that the connection applicant should be given the appropriate opportunity to respond.

NIE Networks issued a response via email on 2 October 2025 and although disappointed, are content with the extension being applied for, stating:

“As this 2nd Transformer will make a big step for our ambition to connect more renewables and strive towards environmental targets we are disappointed the need for the extension but understand that there are now constraints involved on the transmission line.”

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.⁴ It was not received in line with the expectations set out in 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 12 October 2026 for the purposes of Condition 25(5) as regards the connection application for a Section S connection offer, concerning 81MW increased capacity at Tremoge Cluster.

We note, also, that whilst the Application was submitted to the Authority

⁴ [Electricity Connections Decision FINAL.pdf \(uregni.gov.uk\)](http://uregni.gov.uk).

with the necessary information - as per the Authority's 2017 Electricity Connections Decision⁵ (the **Decision Paper Guidance**) – 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 on 10 October 2025, with the application submission date of 29 September 2025 not fulfilling the stated expectations. SONI has offered no explanation for this departure from the expectations set out in the Guidance.

In making this decision we have had proper and full regard to the consultation responses from NIE Networks, in which it expressed disappointment with the application for extension. We note that NIE Networks has said that SONI should endeavour to progress the offer earlier than the end of the extended period, we welcome that SONI has stated in the application that it will endeavour to issue the Section S Offer as soon as practicable.

Following discussions with SONI, further justification was provided regarding the need for deep network reinforcement, and how without this, the 81MW increased capacity could overload the transmission network. SONI mentions it is evaluating projects, such as Connect West, to facilitate the additional capacity. SONI says studies are needed to identify if Connect West will facilitate the extra capacity at Tremoge, and this may require a TNPP, which would require eight months for optioneering and preparation, and four months for approval. SONI also makes reference to timing issues related to consultation with NIE Networks (DNO) and the receipt of a construction offer. SONI regards this as appropriate reasoning for the 12 month extension.

The Authority is satisfied that we should grant the Application based on the need for more investigation into deeper network reinforcement.

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.

SONI is asked to reflect on our observations (above) as to the timing of submissions to the Authority.

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

Jillian Ferris

Head of Networks

Duly authorised by the Authority