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

**Date: 13 November 2025**

**Our Ref: NET/E/BM/1387**

Dear Eimear,

**Request for Authority's consent to Extend the Connection Offer Timelines for a Combined Heat and Power Facility (CHP) at EP Kilroot Energy Park Limited (MEC = 44 MW).**

Thank you for your letter received 29 October 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<sup>1</sup> consent for the extension of the period for the making of an offer by SONI to a Connection Applicant, for the connection of the CHP at EP Kilroot Energy Park Limited (MEC = 44 MW) 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*

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<sup>1</sup> 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.

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 CHP at EP Kilroot Energy Park Limited, was deemed effective by SONI on 15 August 2025, with SONI stating it has until 13 November 2025 to make a Connection Offer.

SONI states in the application that it had “received a high volume of applications for connections in the vicinity of Kilroot.” SONI identified that, due to the “limited capacity for new connections in the Kilroot 275 kV Substation it is not possible for all applicants to connect into the existing Kilroot 275 kV Substation.” Therefore, optioneering is being considered for a potential new 275kV substation in the Kilroot area.

SONI highlights that this would be Strategic Infrastructure, and would require a ‘significant, technically complex’ optioneering assessment, involving appropriate charging principles being determined, consideration of technologies not previously used in Northern Ireland, and possibly involving elements of System Operator Preferred works, requiring approval from the Utility Regulator of a Transmission Networks Pre-Construction project (TNPP).

As part of the analysis to identify the Least Cost Technically Acceptable (LCTA) connection arrangement, it will include a potential 110kV connection option in parallel to the ongoing works for the new 275kV substation which could mean an earlier connection despite being possibly more expensive. SONI comments that this may also take an “extensive period” to determine.

### 3. The Application

SONI is applying for an extension of the Condition 25 period for the making of the Connection Offer from 13 November 2025 to 10 November 2028.

SONI comments in the application that part of its optioneering is the development of a new 275kV substation in the Kilroot area, along with the development of a new 110 kV substation. SONI also mentions the possibility of a 33kV connection, which would then require correspondence with NIE Networks and could impact the status of transmission connection offer. SONI has stated *“is not possible to accept a Transmission connection offer if a Distribution connection offer has already been accepted for the same project.”*

Regarding the TNPP, SONI states that a 50% risk allowance applied to programme timelines in cases where a number of factors have been identified, therefore, this has been classified in the high uncertainty category (as per HM Treasury Green Book guidance).<sup>2</sup>

SONI breaks down the extension period as:

- Completion of optioneering, preparation of TNPP submission for the new Kilroot 275 kV substation, for March 2027 (16 months).
- TNPP approval, for July 2027 (4 months).
- A 50% risk allowance applied to TNPP approval, for May 2028 (10 months).
- Issuing of connection offers to those ahead of this applicant in the connection queue (6 Months).

The TNPP timelines have been elaborated on as including options Appraisal, Initial preferred option consultation and Approvals. This follows request from the UR.

The Authority notes that regarding SONI's mention of a limited capacity at the existing substation at Kilroot, rationale that has been used in previous applications for extension going as far back as 2023, such as the

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<sup>2</sup> [The Green Book and accompanying guidance - GOV.UK](https://www.gov.uk/government/publications/the-green-book-and-accompanying-guidance).

application for 'EPK's GT West Project'.<sup>3</sup> Moreover, replacements or refurbishments to rectify this issue, had been specified in the application for 'the EP Kilroot Steam Turbine Project'<sup>4</sup> back in August 2024, and the Kilroot Data Centre application, made in October 2024.<sup>5</sup> The estimation for completion of optioneering and preparation of this TNPP seems to have a longer duration than envisaged in previous applications.

We note that although the estimation for completion of optioneering and preparation of TNPP seems to have a much longer duration than what can be seen for previous applications, we would expect SONI to fulfil this requirement in a timely manner. Therefore, SONI could consider its timings in the estimation of this activity.

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 13 November 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 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 via email, on 10 October 2025. The Connection Applicant responded via email on 29 October, in which they are not in support of the extension. The connection applicant instead states they request the UR to direct SONI to:

- "Provide estimated timelines for the 110kV connection studies; and
- To issue the 110kV solution at SONI's earliest opportunity in advance

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<sup>3</sup> [2023.01.04 GT West Decision Letter\\_0.pdf](#).

<sup>4</sup> [2024.08.30 EPK ST2 DL.pdf](#).

<sup>5</sup> [2024.11.15 Kilroot DC DL.pdf](#).

of the 275kV solution."

The applicant has also requested that "*SONI aspires to issue the Connection Offer ahead of any deadline agreed by the Utility Regulator.*"

On 28 October 2025, SONI consulted NIE Networks (TO) on the decision to apply for extension. On 29 October 2025, NIE Networks replied to the consultation, stating "*we support this extension.*"

SONI provided the UR and EP Kilroot Energy Park Limited with further explanation concerning the possible 110kV and 33kV connection options, via email on 7 November 2025, following direction from the UR. SONI explained that it must provide the LCTA in accordance with its TCCMS obligations, which requires a full understanding of the cost and technical feasibility of each connection option at the transmission level. Therefore, to assess the feasibility of all options, SONI must conduct the identified optioneering for the 275kV connection. This indicates that these options will still face the 16 month research period.

Regarding the 33kV connection, SONI notes that this directly involves EPKEPL and NIE Networks, as a distribution project. SONI clarified that, "*SONI connections offers prohibit a customer from accepting a connection offer if the customer has already accepted a connection offer for the same project from a DNO (e.g. NIE Networks), the Other TSO (EirGrid), or a DSO in ROI (e.g., ESB).*"

## **5. The Authority's decision**

The Authority holds serious concerns regarding the length of time requested for issuance of the connection offer.

We would remind SONI of fulfilling their commitments and discharging their duties and obligations as licensees in relation to managing connections to the transmission system in a timely manner.

We have noted in this application the 16 month timeframe that is projected for the completion of optioneering into the new 275 KV substation, and the decision by SONI to include a 50% risk allowance to the project timeframe, which appears generous and exacerbates the requested timeline. This is a time frame that the SONI should re-evaluate,

looking at ways these factors could be processed, or allocated, within a shorter period of time.

The Authority understands that once the required TNPP is completed, the LCTA will be available and SONI can therefore begin works on the best suited connection type. This is depending on the outcome of LCTA and correspondence with the connection applicant, identifying if the 110kV connection will produce a shorter connection date than the originally proposed 275kV.

After being asked to provide a breakdown of the time anticipated for the TNPP process within the proposed 16 month timeline. SONI stated to the Authority on 7 November 2025, *"Initial preferred option consultation-preparation of material, undertake stakeholder engagement, consideration of feedback, consultation report, confirm preferred option - August 2026."*

We consider that this is a pragmatic way forward in the circumstances for the amount of work that will be needed to facility the connection. We have also considered the applicants comments in their response regarding concerns around the time to connect and the options put forward by SONI.

Therefore, the Authority considers that an initial two-year extension should allow for SONI to identify and issue the preferred connection option. We also note that the licensee can always request a further extension if it considers it necessary/appropriate.

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.<sup>6</sup> We consider the Application to have been made in accordance with the Decision Paper Guidance.

Our decision is to:

- (i) partially accede to the Application considering it properly founded; and (accordingly)
- (ii) give consent to an extension to 10 November 2027 for the purposes of Condition 25(5) as regards the Connection Application made by the Connection Applicant for the connection of the CHP at EP Kilroot Energy Park Limited

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<sup>6</sup> [Electricity Connections Decision FINAL.pdf \(uregni.gov.uk\)](http://uregni.gov.uk).

(MEC = 44 MW).

We also 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 should particularly consider if any of the other potential options for connection would allow for the making of a connection offer, earlier than 10 November 2027.

We also encourage SONI to continue to engage with the applicant in a meaningful manner and to update estimated timelines when more relevant information enables it to do so.

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 partly grant the Application based on the reasons set out in the Application.

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**