



Energia Response to Utility Regulator
SONI Evaluative Performance Framework: Annual
Performance Review 2024/2025- call for feedback

06 February 2026

1 Introduction

Energia welcomes the opportunity to provide feedback on SONI's Annual Performance Report for 2024/25 as per the Evaluative Performance Framework (EPF). Considering this process determines SONI's formal financial incentive reward, Energia believes it is essential that industry feedback informs the UR's independent panel and is given appropriately significant weighting.

Energia operates a broad portfolio of generation and supply businesses throughout the SEM which are directly impacted by the performance of SONI. We are therefore well positioned to make an informed contribution to the assessment of SONI's performance.

Energia continues to enjoy a good working relationship with SONI and would like to credit SONI for the management of system operations under the exceptional circumstances of Storm Darragh during the performance year in question, and for their continued openness to bi-lateral engagement. SONI's open approach in this regard is reflected in the strong stakeholder engagement feedback presented in the Performance Report.

2 SONI's Self-Assessment for 2024/25

This section of Energia's response covers the specifics of SONI's self-assessment and performance report for 2024/25. Energia's overall view is that there are several respects in which SONI's self-assessment does not clearly align with the information included in the Performance Report, or where there is insufficient information included in the Performance Report for participants to comment on whether the self-assessment score is appropriate.

2.1 Deliverables

As per 5.3 of the 2022 EPF Guidance document, the assessment score for the first criterion '*Deliverability*' should largely be measured by the percentage/extent of delivered deliverables/milestones. The range of possible scores are (-1 = 'Shortfall', 0 = 'Met Expectations', 1 = 'Exceeded Expectations').

| | Role 1 | Role 2 | Role 3 | Role 4 |
|---------------------------|--------|--------|--------|--------|
| Total Deliverables | 15 | 16 | 11 | 4 |
| Deliverables Completed | 9 | 14 | 9 | 1 |
| Completed rate | 60% | 88% | 82% | 25% |
| Deliverability Self Score | 1 | 1 | 0 | 0 |

Table 1: SONI's self-assessed completed deliverables and corresponding deliverability self-assessment.

As per Table 1, for 2024/25 Role 1 is self-scored by SONI as 'Exceeding Expectations' (the highest level of the three tiers) at a self-assessed 60% delivery rate. Role 3 has a higher rate of completed deliverables yet the assessment score for *Deliverability* has been judged as lower than of Role 1 ('Met Expectations'). For Role 4 the delivery rate is only 25% yet the *Deliverability* criterion is scored at the same standard as Role 3 ('Met Expectations').

There does not appear to be a clear way to track the assessment rationale, and in the broader context it should be considered how exceeding expectations at 60% delivery and met expectations at 25% delivery is consistent with the EPF Guidance.

2.2 KPIs

Alongside performance against deliverables, KPIs are an important set of metrics against which SONI's performance should be measured. Properly set, KPIs can reflect measures of the NI system's operation that are most important to stakeholders.

However, as with deliverables, it is not clear how SONI's self-assessment tracks against delivery of KPIs. For example, for Role 1 in which SONI has scored itself as excellent, the KPI of achieving 80% SNSP has not been achieved. While there are a multitude of factors at play as to why 80% SNSP was not reached, it remains the case that if the KPIs are to be of value then their attainment or otherwise should factor into the assessment of SONI's performance.

As a participant that experienced unsustainably high levels of dispatch down in 2024/25, the delivery of a system that can operate safely at higher levels of SNSP is of significant importance to Energia, as it would reduce the overall level of curtailment across the SEM.

Similarly for Role 2, Independent Expert, of the two publications listed against the target of timely delivery of publications, one (Tomorrow's Energy Scenarios) has not been published, again making it difficult to understand how the KPIs factor into the self-assessment score of 1 for delivery.

2.3 Areas Outside of SONI's Control

SONI marks the status of each deliverable through a RAG status system, where Green equals completed, Amber equals partially completed and outside SONI's control, Red equals not completed and outside SONI's control. It is notable that anything that has not been delivered in full is marked as being outside of SONI's control.

While Energia acknowledges that SONI's deliverables often involve multiple stakeholders and are not always entirely within SONI's control, the supporting commentary in the Performance Report does not always allow an external stakeholder to make a reasonable judgement as to the extent to which something was genuinely outside of SONI's control.

For example, for FWP2507, Firm Access Quantity Methodology, an area of significant interest and importance to Energia, the Performance Report cites a need to align with UR timelines, and the complexity of the project, as reasons for the substantial delay. However, it is unclear from reading the Performance Report as to why the scale and complexity of the project was not anticipated at the outset, and therefore the extent to which the delay was not within SONI's control. Making progress on the issue of Firm Access in NI is of critical importance to generators.

3 Future of the EPF

The current EPF has been in operation for the existing and extended price control period (2020 – 2027). Ahead of a future price control and as per 1.3 of the existing EPF, the process may require review and whether changes should be considered for future application. As we approach a new Price Control period, it is an appropriate time to consider how the EPF might adapt for the future.

3.1 Alignment of EPF with overall system performance

Energia's priority is that the self-assessment of SONI's performance as per the EPF is aligned with the overall performance of the system. For example, during the current price control period, key transmission upgrades have faced serial delays (e.g. North-South Interconnector, Mid-Antrim Upgrade and the Mid-Tyrone upgrade), while dispatch down has increased substantially. While these factors are not entirely within SONI's control, it is important that the EPF captures the underlying performance of the system and focuses on key performance metrics. This will help ensure that SONI's incentives are tied to the actual performance of the system.

Delivery of transmission upgrades in a timely manner and a reduction in dispatch down is of fundamental importance to stakeholders in NI, including Energia, and the EPF needs to ensure that SONI's incentives are fully aligned with the deliver thereof.

3.2 Ensuring that all SONI's responsibilities are captured

There are some areas of the SEM where SONI holds joint responsibility with EirGrid for the system. To fully assess SONI's performance, it is important that the EPF captures these areas where the System Operators are together responsible. Otherwise, there is a risk that there is less incentive for the System Operators to deliver in these areas and important aspects of the system do not receive sufficient attention.

For example, the System Operators are jointly responsible for the systems underlying the Capacity Remuneration Mechanism, a crucial market for supporting system adequacy. However, progress on implementing long-standing Capacity Market Code modifications to improve the functioning of the secondary trading market in the CRM has been delayed due to TSO inaction. This is of significant frustration to industry participants and needs to be captured in future iterations of the EPF process.

3.3 Transparency in EPF Scoring

Additionally, for the sake of transparency and efficacy consideration should be given to the EPF scoring and grading. The EPF sets out a scoring system with three tiers (details listed in 2.1) which then must be subsequently translated into a separate grading system of five tiers (1 Poor, 2 Lagging, 3 Baseline, 4 Good, 5 Excellent). There are redundant layers that do not add value, and a clearer single level scoring system could make the process more accessible for all.

Consideration should also be given to the approach of giving a higher level of discretion for the panel to score the retrospective performance of the past year in comparison to the more prescriptive guidance on scoring the Forward Work Plan. While allowing the panel to apply discretion and judgement in the scoring of performance (as per 5.33 of the 2022 EPF Guidance document) is important, there is also the risk that too much discretion leads to a lack of clarity as to why final scoring differs significant from self-assessment or performance against deliverables/KPIs.

4 Conclusion

Energia thanks SONI and the UR for the opportunity to feed into the EPF process for 2024/25. Energia looks forward to any further engagement on this matter and continuing to engage with both SONI and the UR on the EPF process going forward.