

## FERA Response on SONI's Annual Performance Report for 2014/2025

06/02/2026

FERA's members operate in the Demand Side Response sector of the electricity industry and perform a significant role in supporting the operation of the I-SEM balancing market and facilitating the continuous introduction of renewables. The FERA members have together a registered capacity above 160MW, which carries a significant contribution to system support and stability.

Our members have been operational since 2014 and have client sites right across the island of Ireland and thus operate in both jurisdictions.

Their portfolios include Demand Response through turning equipment off, as well as behind the meter generation. They utilise diesel and HVO, along with gas cleanup capabilities. Some members operate AGUs and others have actual Generation stations.

FERA supports the work performed by SONI as believes that in general it is improving and that Users, under Grid Code, are supported to deliver a balanced and efficient System.

We do have a limited number of comments, specific to the performance report, as follows.

### Role 1 section

- mentions issues outside SONI's control but it would be good to have a better understanding of what they were and the interactions on SONI with those issues.
- The handling of the Kilroot environmental issue reflects the "Trusted Advisor" role that SONI seek to achieve. The Environmental issues at Kilroot are the responsibility of the Kilroot operators and the government Departments. SONI can seek to advise and educate the results of actions and non-action.
- Working extensively with DfE, UR and the NI Executive to secure a temporary uplift of Kilroot's run-hour limits. was an ability to access generation that may otherwise become limited, due to environmental issues. There may remain a question as to the role of SONI as a 'trusted advisor' around the approval of such generation plant and the fact that it can become limited in its ability to support the System. There may need to be some examination around the selection of certain technologies going forward - a lesson to be learnt from this episode.
- The speed of addressing a 2 generator rule shows "Necessity being the mother of invention", although that road was already being examined for the future and unexpected issues accelerated it.



- The introduction of a new EMS during a stressful time is seen by SONI as a success and it has provided better inhouse operational capabilities. There is a question however as to what benefits it brought to the consumers, who ultimately pay for it. That is missing from the report.
- The reduction in available conventional generation was a challenge that was met with other forms of generation and Demand Response, all of which were utilised by SONI. In addition- the utilisation of System Alerts maintained confidence from stakeholders in the operation of the System, which is seen by stakeholders to be very useful.

#### Role 2 section

- The Dispatch Down Action Plan is seen as a success story and it did indeed address an issue that came to light, subject to the changes in market participation of interconnectors and power flows from adjacent systems. However, the ability to fire fight successfully may overshadow the expectation that a Transmission System Operator, with Balancing Market involvement, would foresee their scheduling and dispatch process outputs. It was the resultant impact on participants that raised the issue, but could that have been addressed in advance by SONI to alleviate the impact to the participants. Were there sufficient proactive actions taken?

#### Role 3 section

- FERA members support the actions taken by SONI in the development of the Transmission system.

#### Role 4 section

- It is welcoming to see provision of commercial platforms and contracts that assist in the support of the system. There have been many challenges in following decisions by third parties, such as the SEMC, however stakeholders are somewhat underwhelmed by the result to date on the changes away from DS3. Some Stakeholders are now questioning if the complexity and cost of the proposed FASS outweigh the retention of DS3. SONI's position of 'trusted advisor' may require a stronger voice when looking to implement other parties' decisions.